

Draft complaints performance and service improvement report for the housing landlord service

2025-26



Contents

No.	Section	Page
1	<u>INTRODUCTION</u>	3
2	<u>SUMMARY OF THE COMPLAINT HANDLING CODE SELF-ASSESSMENT FINDINGS</u>	4
3	<u>ANALYSIS OF COMPLAINT HANDLING PERFORMANCE</u>	5
4	<u>IMPROVEMENTS AS A RESULT OF LEARNING FROM COMPLAINTS</u>	8
	<u>ANNEX 1 – SELF-ASSESSMENT</u>	10

1. Introduction

- 1.1. Dartford Borough Council (“the Council”) strives to provide excellent services, recognising that it can always do better. Part of this involves exercising good practice in complaint handling by being open and responsive, listening to residents expressions of dissatisfaction and resolving issues as quickly as possible.
- 1.2. If a complaint is made, this follows a two-stage process. Stage 1 is where the resident expresses their dissatisfaction. If there is still dissatisfaction after stage 1, the resident may escalate the complaint to stage 2 for a review. This is the Council’s final response on the complaint.
- 1.3. For housing landlord related complaints, if the resident remains dissatisfied at the end of stage 2, the resident has the right to escalate the complaint for a Housing Ombudsman investigation. Residents also have a right to contact the Housing Ombudsman for advice before making a complaint to the Council or at any stage during the Council’s consideration of their complaint.
- 1.4. Achieving an accessible, positive and effective complaint handling culture includes learning from complaints and making improvements to services as a result. This document presents the Council’s housing landlord service annual complaints performance and service improvement report for the period 1 April 2025 to 31 March 2026 in accordance with the requirements set out in the Housing Ombudsman’s [Complaint Handling Code](#) (February 2024).
- 1.5. **About this report**
 - 1.5.1. The Housing Ombudsman’s Complaint Handling Code became statutory from 1 April 2024, which means that social housing landlords are now obliged by law to follow its requirements.
 - 1.5.2. The Social Housing (Regulation) Act 2023 places a legal duty on the Ombudsman to monitor social housing landlord’s compliance with the Code. This means there is a requirement on the Council, as a social housing landlord, to produce an annual complaints performance and service improvement report, which must include:
 - a) An annual self-assessment against the Code to ensure the complaint handling policy remains in line the Ombudsman’s requirements;
 - b) A qualitative and quantitative analysis of the social housing landlord service complaint handling performance. This must also include a summary of the types of complaints that the social housing landlord service has refused to accept;
 - c) Any findings of non-compliance with the Code by the Ombudsman;
 - d) The service improvement made as a result of learning from complaints; and
 - e) Any other relevant reports or publications produced by the Ombudsman in relation to the work of the social housing landlord.
 - 1.5.3. The annual complaints performance and service improvement report must be reported to the social housing landlord’s governing body (or equivalent) and published on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this. Submission of this year’s self-assessment to the Ombudsman must be made by 30th September 2026.

2. Summary of the Complaint Handling Code self-assessment findings

2.1. [Annex 1](#) sets out the full Complaint Handling Code self-assessment by the housing landlord service for 2025-26.

2.2. In summary, the self-assessment found areas of strong performance in compliance with the Code in relation to policy, procedure and exercising best practice. For example:

- Consistent use of the universal definition of a complaint.
- There are only two stages to the Council's complaints process.
- Timescales for accepting complaints, acknowledging complaints, and extensions align with the Complaint Handling Code.
- Setting out the understanding of the complaint and the outcomes the resident is seeking ("the complaint definition") in the acknowledgement of the complaint.
- Promotion of the complaints process and the role of the Housing Ombudsman.
- Accessibility of the complaints process.
- Robust scrutiny of complaint performance, complaint outcomes and organisational learning through the Audit Board, Housing Advisory Board, Cabinet, Overview and Scrutiny Committee, and the Housing Complaints Panel chaired by the Member Responsible for Complaints.

2.3. Further positive developments include:

- Using insights from the 2025–26 Tenant Satisfaction Measures (TSM) data to identify potential service issues, proactively address customer concerns and reduce the likelihood of formal complaints.
- Enhanced communications to improve residents' understanding of the complaints process and how complaints are managed.

2.4. The self-assessment also found some areas where, while the assessment has determined compliance, there is further opportunity for improvement, as set out below:

Improvement	Steps being taken
Strengthening service improvement through learning from complains	Develop and undertake regular audits of complaint handling to identify trends, assess quality and efficiency, and drive service improvements. The Housing Complaints Panel will continue to expand its role in reviewing learning outcomes and monitoring improvement actions.
Increasing customer satisfaction with complaint handling	Use insights from the Tenant Satisfaction Measures (TSM) survey and transactional complaint satisfaction surveys to identify customer pain points and develop targeted improvement actions.
Monitoring actions taken from complaint outcomes	Implement a process for tracking actions resulting from complaints to ensure lessons learned are embedded, progress is monitored, and outcomes are regularly reviewed through the Housing Complaints Panel.
Understanding refused complaints	Introduce a process to monitor why complaints are refused.

3. Analysis of complaint handling performance

3.1. This report considers formal complaints made by residents (Council tenants and leaseholders) from 1 April 2025 to 31 March 2026.

3.2. Number of landlord related complaints opened

Stage 1	Stage 2	Total
152	64	216

3.3. Types of matters that were not accepted as a complaint

3.3.1. In practice, all complaints should be accepted unless the matter being raised is not covered under the corporate complaints procedure. Some examples include requests for a service, complaints about court proceedings, or complaints for which there is a right of appeal to a Tribunal.

3.4. Complaints by housing landlord service area

Please note some complaints received cover multiple service areas

Repairs and maintenance	136
Staff behaviour	37
Estate management	36
Anti-social behaviour	28
Right to buy	24
Complaint handling	24
Rents and service charges	12
Compensation	7
Leasehold services	5
Moving to a property	4
Occupancy rights	2
Housing allocations	1
General Housing Advice	1
Total	317

3.5. Stage 1 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	Total
61	29	62	0	152

3.6. Stage 2 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	Total
14	15	35	0	64

3.7. Stage 3 (Housing Ombudsman) complaint outcomes

3.7.1. The Housing Ombudsman publishes reports each year for social housing landlords with five or more findings determined. The Ombudsman may also produce special investigation reports following an investigation into whether there is a systematic failure within a landlord. During this reporting year, the Council’s landlord service has not been subject to an Ombudsman report due to five or more determinations or a special investigation report.

- Nine complaints were escalated via the Housing Ombudsman during 2025/26. The Ombudsman requested information from the Council’s landlord service, which was supplied within the timescales. Of the nine complaints referred to the Housing Ombudsman in 2025/26, three have been referred for assessment, three were found to fall within the landlord’s internal complaints handling process, one is awaiting investigation, one is still under assessment and evidence gathering is ongoing in relation to one case.

3.7.2. There was one stage 3 complaint investigation that was investigated in the reporting Year (2023-24) and determined in this reporting year:

- Housing Ombudsman Complaint (202327308) – The Housing Ombudsman determined there was no maladministration with regards to the landlord’s communication of its decision to change its flexible tenancies to secure tenancies. It did find there was a service failure with regards the landlord’s handling of the residents’ request to change their tenancy from a joint tenancy to a sole tenancy and with regards to the landlord’s complaints handling. The Council was ordered to issue a written apology to the resident for its identified failings.

3.8. Tenant satisfaction measures

3.8.1. The housing landlord service collects, publishes and submits to the Regulator of Social Housing a set of annual tenant satisfaction measures relevant to housing stock that falls into the definition of Low Cost Rental Accommodation (LHRA)¹. These measures show how well the housing landlord service is doing in providing quality homes and services to its tenants (the measures do not include leaseholder residents in the calculations).

3.8.2. The following tenant satisfaction measures relate to the effective handling of complaints. The 2025-2026 results for these measures are set out below.

Management information measures	
CH01 (1) – Number of stage 1 complaints received per 1,000 homes	34.6
CH01 (2) – Number of stage 2 complaints received per 1,000 homes	14.3

¹ LCRA is defined in the Housing and Regeneration Act 2008 as accommodation that is: (a) made available for rent, (b) has rent that is below the market rate, and (c) made available to people whose needs are not adequately served by the commercial housing market.

Management information measures	
CH02 (1) Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales	94.5%
CH02 (2) – Proportion of stage 2 complaints handled within the Housing Ombudsman's Complaint Handling Code timescales	93.3%
Tenant perception survey measure	
TP09 – Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling	32%

- 3.9.1. We have seen significant improvements in our compliance with complaint response timescales compared with the previous year. Performance for Stage 1 complaints increased by +9.4%, while Stage 2 complaint performance improved by +24.5% percentage points, demonstrating a substantial enhancement in the timeliness of our complaint handling processes. The timescales should be to respond to stage 1 complaints within 10 working days of sending an acknowledgement and 20 working days for stage 2 complaints. Where it becomes likely that the timescale will not be met, (for example, it is a complex complaint), the resident should be informed of the expected timescale for a response of no more than 10 working days for Stage 1 complaints and 20 working days for Stage 2 complaints without good reason, and the reason(s) must be clearly explained to the resident.
- 3.9.2. Performance in relation to satisfaction with complaint handling decreased by -3.9% since last year where the tenant satisfaction measures survey carried out in 2024-2025 reported 35.9% of respondents were satisfied with approach to complaints handling compared to 32% this year. While the score is low, it is about average when benchmarked with other providers.
- 3.9.3. This year's survey found the most common themes mentioned in comments around improving complaints handling are listening to tenants more and better communication. This is similar to last year where communication, listening to tenants and ease of contacting were the most common themes mentioned.

4. Improvements as a result of learning from complaints

- 4.1. Improvements as a result of learning from complaints is an important element of a positive and effective complaint handling culture, which aims to ultimately increase resident satisfaction with complaint handling.
- 4.2. Learning from complaints is much more than scrutinising data, such as the level of complaints, decisions made and whether complaints were handled within timescales. Understanding where things have gone wrong, why they have gone wrong, and how to make sure the same thing does not happen again, is central to learning and improving services.

4.3. Improvements to complaint handling

- 4.3.1. Responses to complaints are taken in the form of an apology and putting things right. This reporting year the housing landlord service has learned from its complaints and from feedback received from its residents and the Housing Ombudsman. The following improvements have been made to how the Housing Service handles complaints:
- The Customer Communication and Engagement Team continues to oversee the effective handling of complaints. This includes working closely with Housing Management to identify common themes, monitor trends, and drive service improvements.
 - The Corporate Complaints Policy and Procedure has been reviewed and updated to ensure full alignment with the Housing Ombudsman's Complaint Handling Code.
 - A Housing Complaints Panel has been established, chaired by the Member Responsible for Complaints, to scrutinise complaint handling performance, promote accountability, and support the development of a positive complaints-handling culture across the service.
 - Best practice guidance on complaint handling has been issued to Housing Services staff, complementing the Corporate Complaints Policy and Procedure and the refresher complaints training delivered to Tenancy Services staff.
 - Housing Managers receive an overview of complaints data at each management team meeting. This enables managers to monitor performance, identify emerging issues and trends, share learning, and take timely action to address areas requiring improvement.
 - New complaint response templates have been introduced to ensure residents receive all required information in line with the Complaint Handling Code.
 - The Customer Communication and Engagement Team continues to issue satisfaction surveys following the closure of complaints. Feedback received is used to identify learning opportunities and inform service improvements.
 - Complaints performance information is regularly published to promote transparency, accountability, and resident confidence in the complaints process.
 - A communications campaign has been delivered to tenants and leaseholders across multiple channels, providing information on what constitutes a complaint, how complaints are handled, and how to make a complaint. This information remains available on the website and is incorporated into the wider Housing Communications Plan, with regular promotion to increase awareness and understanding of the complaints process.
 - A new system has been introduced to monitor and track actions arising from complaints. This provides an auditable record of agreed remedies and service improvements, ensuring commitments made to residents are delivered and enabling a more proactive approach to complaint resolution.
 - Following the lessons identified through the Complaints Panel, a formal contingency arrangement has been implemented. Responsible managers within each service area have appointed designated cover staff and established a backup rota to ensure that complaints

continue to be managed and responded to within the prescribed timescales during periods of staff absence or unavailability.

Annex 1 – Self-assessment

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints Policy - Section 3, page 11 Complaints webpage Housing complaints webpage	Dartford Borough Council's ("the Council's") Corporate Complaints Policy and Procedure ("the Complaints Policy") uses the Complaint Handling Code definition of a complaint. This is also clearly defined for residents on the Council's website.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy - Section 4.2.2 page 19 Complaints Policy - Section 3.3, page 11 and Section 4.2.2, page 19 Complaints Policy - Section 2.5, page 6	The Complaints Policy states that a complainant does not have to use the word 'complaint' when expressing dissatisfaction. The Policy explains that any resident that expresses dissatisfaction will be given a choice to make a complaint. The Policy explains those who can use the complaints procedure as any person or organisation receiving or seeking to receive a service from the Council and someone acting on behalf of a person or organisation receiving or seeking a service from the Council e.g. Councillor, MP, next of kin.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Complaints Policy - Section 6.8.2, page 29 Help and advice on the corporate complaints procedure webpage	The Complaints Policy and 'help and advice on the corporate complaints procedure' webpage advises residents of organisations that may assist them in making a complaint.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy - Section 4, pages 18-20	The Complaints Policy includes advice as to what constitutes a complaint, emphasising the importance of recognising the difference between a complaint and a service request. The Policy explains that a first-time request for a service or for information that is properly for the Council to give should not be seen as a complaint. A repeated request may well take the form of a complaint. A complaint should be raised when the customer raises dissatisfaction with the response to their service request. Where a service request is received via the complaints process, this is forwarded onto the relevant team to deal with. Service requests are recorded separately to complaints on the housing landlord service case management systems.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service	Yes	Complaints Policy - Section 3.3, page 11	The Complaints Policy states that if a complaint is raised because of dissatisfaction with how a service request was handled, the complaint will not prevent/stall or impact on actions needed to resolve the service request.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	request if the resident complains.			
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Tenant Satisfaction Measures Survey Code of Practice on Resident Satisfaction Surveys	The Council's Housing Service uses transactional and perception survey feedback to measure satisfaction with the services provided. The Housing Service has developed an informative to be included in survey feedback forms and standard letter templates to explain how residents can make a complaint if they are dissatisfied with services received. The Housing Service has a Code of Practice on Resident Satisfaction Surveys, which reinforces the need to ensure that where survey feedback raises a service request or a complaint, that this is passed onto the relevant team to address.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy - Section 3.8, page 12	All complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Policy (see 2.2). The Housing Service does not currently monitor the reasons for not accepting complaints. Moving forward, a process will be developed within Infreemation to monitor refused complaints (including service requests) to gain assurance that exclusions to the complaints process are being applied appropriately.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	Complaints Policy - Section 3.8, page 12	All complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Policy., including: • Requests for a service, for instance initial reporting of: • A repair to a boiler or a report of anti-social behaviour to the Housing Service • A missed bin collection to the Waste and Recycling Service • The hygiene of a food business to the Environmental Health Service • Complaints about court proceedings • Complaints about personnel matters concerning employees of the Council • Complaints about something which affects all or most of the inhabitants of the Borough for instance the amount of Council Tax being levied • Complaints about matters for which there is a right of appeal to a Tribunal or to a Government Minister, for instance refusal of planning permission • Complaints for which there is a legal remedy, for instance, an injury claim. Although if a letter before action has been received but no court proceedings are started, the complaint must continue through the complaints process • Complaints already being dealt with by the Local Government/Housing Ombudsman • Complaints from employees of the Council (except as external users of services)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Most commonly raised complaints that are not within the remit of our procedure webpage	• Matters which have arisen more than twelve months before the complaint is made or more than twelve months of the complainant becoming aware of the issue, unless there are very special circumstances • Matters connected with 'internal malpractice' and the employment protection for individuals disclosing certain information in relation to the workplace (refer to the Whistleblowing Policy) • Matters connected with the level of Housing Benefit/ Council Tax Benefit awarded • Policy issues, e.g. the allocation of resources or prioritisation of works • Systematic failure of the Council to discharge a function for which it is responsible. The 'most commonly raised complaints that are not within the remit of our procedure' webpage provides clarification to customers on complaints that fall outside the remit of the Complaints Policy.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit	Yes	Complaints Policy - Section 3.8, page 12 and Section 3.13, pages 16	The Complaints Policy states that the Council will not investigate complaints more than 12 months after the cause of the complaint has arisen or more than 12 months of the complainant becoming aware of the issue.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy - Section 3.8, page 12 Exclusion Applied – Complaint not accepted letter template	All stage 1 complaints are accepted unless the matter being raised is not covered under the Complaints Policy (as covered in 2.2). The Policy states that when a decision is taken not to accept a Stage 1 complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and their right to take that decision to the relevant Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		While there are some exclusions to accepting a complaint under the Complaints Policy (as covered in 2.2), these are due to matters that do not come under the remit of the Policy, for example, there are alternative routes for redress such as through the courts or First-tier Tribunal. A blanket approach to excluding complaints is not taken. Each complaint is considered on its own merits on a case-by-case basis.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy – Section 6, pages 26-29 Equality & Diversity Framework Customer Access Review on the Complaints Procedure Housing landlord-related complaint methods used by residents 2025-26: • Online form = 40.75% • Paper form = 2.31% • Email = 47.22% • Telephone = 9.72% • Via Ombudsman = 00.00%	Complaints can be made using a range of options including in person, by phone (including Relay UK), by email/internet, on audiotape, in writing, in Braille and in languages other than English. In 2025-26, the majority of housing landlord related complaints were received via email (47.22%) and using the online form (40.75%). The Council has a corporate Equality & Diversity Framework, which sets out how it will comply with the Public Sector Equality Duty under the Equality Act 2010. The Complaints Policy has been subject to a Customer Access Review (last reviewed in December 2022), to assess the equality impact the procedure will have on the protected characteristic groups in terms of accessing and using the process, including and how reasonable adjustments are in place.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint	Yes	Housing Service complaint logging template Best practice guidance on the Complaints Policy	While the Council has an online and paper complaint form, complaints can be raised in any way and with any member of staff. Where complaints come directly into the Housing Service by phone or in person, a complaint logging template has been introduced in 2024 to capture the details of the complaint. The aim is to ensure that such complaints are sent on to the team responsible for logging complaints on the complaint management system. This is so that all

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	to the appropriate person within the landlord.			complaints received, however they are made, are progressed appropriately and logged on the complaints system. In addition, best practice guidance on complaint handling has been issued to Housing Service staff to complement the Complaints Policy and raise awareness of the responsibility to take complaints directly.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Number of housing landlord-related complaints opened (stages 1 and 2): • 2022-23 – 40 • 2023-24 – 22 • 2024-25 – 90 • 2025-26 - 205 Tenant Satisfaction Measures 2025-26: • CH01 (1) No. of stage 1 complaints received per 1,000 homes – 34.6 • CH01 (2) No. of stage 2 complaints received per 1,000 homes – 14.3	Complaint volumes, types of complaints, complaint outcomes and learning from complaints, is monitored by the Housing Service. This shows that complaint volumes have increased significantly since last year, which may be indicative of increased awareness raising of the complaints process and due to the introduction of a new complaint management system (Infreemation), which now records and manages complaints more effectively. The Housing Service will also be looking to benchmark on the Tenant Satisfaction Measures to understand how complaint volumes compare with other social housing providers of similar type and size of stock (CH01 number of stage 1 complaints received per 1,000 homes and number of stage 2 complaints received per 1,000 homes).
3.4	Landlords must make their complaint policy available in a clear and accessible format for	Yes	Complaints Policy Corporate complaints webpage	The Complaints Policy is available in a clear and accessible format for all customers on the Council's website. This includes the following information:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		Complaints leaflet and form	• Formal complaints procedure and form • The stages of the complaints procedure and timeframes for responding • Help and advice on the complaints procedure
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints Policy – Section 2.7, page 7 Complaints leaflet and form Corporate complaints webpage Stages of the Corporate Complaints Procedure webpage Complaints relating to the Council's Housing Landlord Functions webpage Housing complaints webpage The Link newsletters	The Complaints Policy includes how the process to complain will be publicised, including information about the Ombudsman and Code. This includes via the 'How to Complain to Dartford Borough Council' leaflet, which is available on the website, at Customer Services and other Council service outlets, and available to all staff who receive complaints. The Council publicises the Ombudsman services and the Code in various ways, such as on the 'Stages of the Corporate Complaints Procedure' webpage, the 'Complaints relating to the Council's Housing Landlord Functions' webpage, the 'Housing complaints' webpage and in the Housing Services' tenant and leaseholder newsletter 'the Link'.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy – Section 2.5, page 6, 6.8.2, page 29 Help and advice on the corporate complaints procedure webpage	The Complaints Policy explains that someone acting on behalf of a person or organisation receiving or seeking a service from the Council e.g. Councillor, MP, next of kin can use the complaints procedure on their behalf. It also recognises that some complainants will have special needs and it is important to be aware of this and the complainants needs, which can include the complainant wishing to enlist the help of a friend, relative, Councillor, MP, professional person, e.g. doctor or priest, or an advocacy service. The 'help and advice on the corporate complaints procedure' webpage advises residents of organisations that may assist them in making a complaint.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Stages of the corporate complaints procedure webpage Complaints relating to the Council's landlord functions webpage Housing complaints webpage Link newsletter to tenants and leaseholders Stage 2 decision letter	The 'stages of the corporate complaints procedure' and 'complaints relating to the Council's landlord functions' and 'Housing complaints' webpages include information on how customers can access the relevant Ombudsman. The Housing Services' tenant and leaseholder newsletter 'The Link' also contains a regular article on how to make a complaint and information about the right and how to access the Ombudsman. The stage 2 decision letter templates includes information on how to escalate the matter to the relevant Ombudsman if the customer remains dissatisfied at the end of the Council's complaints process.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints Policy – Sections 1.4 to 1.6, pages 3-4 Audit Board Complaints Monitoring and Procedure Review	The Head of Legal Services is the Council's Corporate Complaints Officer and has overall responsibility for the Complaints Policy and its administration, maintenance and annual reporting to the Audit Board. The Corporate Complaints Officer remains independent of any decisions, but may give guidance and advice on procedure. The Council's Audit Board receives an annual report from the Corporate Complaints Officer on complaints activity for all complaints across the Council in the previous year, including landlord related complaints. The Leadership Team is responsible for the effective operation of the Complaints Policy within their areas of responsibility. The Customer Communications and Engagement team continue to co-ordinate complaint handling. The team's responsibilities include the overseeing of the effective handling of complaints and learning from them. The officers are assigned to acknowledging complaints, ensuring that complaints are handled within timescales and quality checking the handling of complaints.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority	Yes		The Corporate Complaints Officer and officers assigned to handling complaints have access to staff at all levels and autonomy to resolve complaints. The Corporate Complaints Officer is also available to all complaint handling officers to

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and autonomy to act to resolve disputes promptly and fairly.			provide guidance and advice on procedure and best practice.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaints Policy – Section 2.12, page 10 Guidance on the Corporate Complaints Procedure (July 2024) Housing Managers Training Presentation (October 2024)	The Complaints Policy sets out the level of training and support to be provided to complaints handlers. Guidance notes and training on best practice in complaints handling will be offered to all staff involved in dealing with complaints. Complaints handling will be included as a core module in the Customer Services training programme. Refresher courses will be run by the Corporate Complaints Officer. The Leadership Team, Corporate Complaints Officer and DCOs will offer guidance and support. The whole ethos of the complaints system is to improve the Council's performance and perceptions of its performance; to learn from mistakes; and to build trust by being open and honest in handling complaints. Within the Council's Housing Service, best practice guidance on complaint handling was issued to staff in 2024 to complement the Complaints Policy. Housing Managers received a presentation on complaint handling to ensure that the processes followed aligns with the updated Complaints Policy and the principles of a positive complaint handling culture. The Tenancy Services team has also received complaints update/refresher training.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy	The Council has a single policy for dealing with complaints covered by the Code. This means that customers are not treated differently when they complain about the standard of any type of service delivered by the Council.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints Policy	The Complaints Policy does not have an extra named stage, such as 'stage 0' or an 'informal complaint' stage.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints Policy – Section 8, pages 30-35	The Complaints Policy is a two-stage process for complaints handled by the Council. Stage 2 is the Council's final response under the Policy and it does not prevent access to an Ombudsman past this stage.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the	Yes	Complaints Policy – Section 5.6, page 22	Complaints about contractors are treated as complaints against the service area employing the contractor where the service area will investigate and respond to the complaint in accordance with the Complaints Policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy – Section 5.6, page 22	Complaints about contractors are treated as complaints against the service area employing the contractor where the service area will investigate and respond to the complaint in accordance with the Complaints Policy.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Complaints Policy – Section 8.4(b), page 31, Section 8.5(g), page 33-34 Stage 1 and stage 2 acknowledgement letter templates	The Complaints Policy sets out the requirement to set out the complaint definition. Stage 1 and stage 2 acknowledgement letter templates have also been developed to ensure that complaint handlers include the complaint definition. If the basis of the complaint is not evident or clear enough, the service Manager will contact the complainant to clarify the focus of their complaint and then decide how the complaint should be taken forward. Options may include answering a question; providing further information; clarifying a misunderstanding; acknowledging and/or rectifying an error.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they	Yes	Complaints Policy – Section 8.4(b), page 31, Section 8.5(g), page 33	The Complaints Policy sets out that the acknowledgement should set out which aspects of the complaint the Council is and is not responsible for.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	are, and are not, responsible for and clarify any areas where this is not clear.		Complaints Policy – Section 5.7 and 5.9, pages 23 Complaints Policy – Section 5.14, page 25 Most commonly raised complaints that are not within the remit of our procedure webpage	The Complaints Policy provides clarification on areas not within the Council's remit, for example complaints about third parties and partner organisations. The Complaints Policy and website further clarifies examples of most commonly raised complaints not within the remit of the procedure, for example, complaints about Councillors, highways, homelessness decisions, Housing Benefit/Council Tax decisions, liability for Council Tax or Business Rates, Parking Penalty Charge Notices, licensing decisions, refusal to grant planning permissions.
5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully.	Yes		All residents should expect from complaint handlers the following: - To objectively determine, based on the information and evidence provided, whether the facts of the case have been determined - To listen to the voice of the resident - That no complaint is investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter. Officers, partners, Councillors and contractors must distance themselves from the investigation of or involvement in any complaint in which they are directly or indirectly implicated; - That any request for the identity of the complainant to remain confidential will be respected as far as possible.
5.9	Where a response to a complaint will fall outside the	Yes	Complaints Policy – Section 2.6, page 7,	The Complaints Policy states that if it is not possible to provide the complainant with a full response within target

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		Section 3.16, page 17, Section 8.4(b), page 31, Section 8.5(g), page 33	timescales of 10 working days for stage 1 complaints or 20 working days for stage 2 complaints, the complainant must be kept informed of any extension (10 working days for stage 1 and 20 working days for stage 2 complaints). Where a response to a complaint falls outside of the extended timescales, the Council will agree with the resident suitable intervals to update them on their complaint.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints Policy – Section 9, pages 37-38	The Complaints Policy notes the requirement on the Council to make reasonable adjustments. Complaints can be made using a range of options including in person, by phone (including Relay UK), by email/internet, on audiotape, in writing, in Braille and in languages other than English. Customers are asked to consider completing an equalities monitoring data form when they submit a complaint using the Corporate Complaints Form. However, the submission of the equalities data is voluntary/discretionary, and a significant number of customers choose not to provide this information. In addition, not all complaints are submitted via the Corporate Complaints Form and are received through other methods (i.e. email, telephone), and therefore, equalities monitoring data is not collected as routine. The housing landlord service does however record residents' disabilities and specific needs including any reasonable adjustments required, on the One Housing system as attributes.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes		All complaints will be accepted unless the matter being raised is not covered under the Council's Complaints Procedure (as covered in 2.2) or there is a valid reason not to accept the complaint.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Infreemation	All complaints and correspondence are logged on a central corporate complaints management system (Infreemation), which was introduced in January 2025 to replace the previous system (Pentana). The system ensures that complaints records are fully maintained and preserved, and provides improved functionality so that efficiency is increased along with the ability to interrogate data more effectively and easily.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes		A complaint can be remedied at any stage of the Complaints Procedure. It is the Housing Service aim to ensure that the remedy provided is appropriate and proportionate to redress the matter sufficiently without the need for escalation.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour	The Council has a Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour. This includes reasons for putting any restrictions in place.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour Employee Code of Conduct	The Council's Policy on Unreasonably Persistent and/or Vexatious Complainant's Behaviour sets out that the Council must be mindful that it has responsibilities under equality and diversity legislation concerning the way it provides its services. Of equal importance, is the Employee Code of Conduct which requires staff to maintain high standards when dealing with customers. However, the need to be patient or make adjustments when providing our services

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				does not extend to having to deal with unacceptable behaviour from customers. The Council must also be fair to all customers by prioritising its resources effectively. The time spent with each customer should be appropriate and proportionate. The Council is committed to providing services that are accessible to the broadest range of customers. This commitment also encompasses legal obligations under the Equality Act 2010. If a customer is having difficulty accessing services for any reason, the Council will adjust the way it provides its services where it is reasonable to do so. Where a customer is behaving in a difficult, persistent or unacceptable manner, the Council must consider whether this may be caused by any personal difficulties or characteristics they have, which may be making services more difficult to access or use.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors	Yes	Complaints Policy - Section 2.1, page 4, Section 3.6, page 11, Section 3.14, page 16	The Council aims to resolve complaints straight away. However, regardless of whether a complaint is resolved straight away, the complainant will still receive a stage 1 response for all complaints and if progressed, a stage 2 response. straightforward stage 1 complaints promptly.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within 5 working days of the complaint being received.</u>	Yes	Complaints Policy – Section 2.6, page 6, Section 3.14, page 16, Section 8.4(b), page 31 Stage 1 acknowledgement letter template	The Complaints Policy sets out that stage 1 complaints must be acknowledged within 5 working days of receipt.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days of the complaint being acknowledged.</u>	Yes	Complaints Policy – Section 2.6, page 6, Section 8.4(b), page 31 Stage 1 decision letter template Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling	The Complaints Policy sets out that stage 1 complaints must be responded to within 10 working days of the complaint being acknowledged.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Code timescales 2025-26 – 94.5%	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy – Section 2.6, page 7, Section 3.16, page 17, Section 8.4(b), page 31 Stage 1 extension to 10 working day response timescale letter template	The Complaints Policy sets out that if it is not possible to provide the resident with a full response within the 10 working day timescale, the resident must be told whether an extension will be applied and when to expect a reply. Any extension must not be more than 10 working days without good reason and the reasons for the extension clearly explained.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy – Section 3.16, page 17 Stage 1 extension to 10 working day response timescale letter template	The Complaints Policy sets out that the resident must be provided with the contact details of the Ombudsman. The Ombudsman contact details are included in the stage 1 extension to the 10 working day response timescale letter template.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions	Yes	Complaints Policy – Section 8.4(g), page 32	The Complaints Policy states that the response must be provided when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Therefore, the decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must still be tracked and actioned promptly with appropriate updates provided to the resident.		Complaints Policy – Section 8.4(k), page 32	The Complaints Policy states that any outstanding action to resolve the complaint will be tracked and actioned promptly with appropriate updates provided to the resident.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Stage 1 decision letter template	The stage 1 decision letter template is structured so that each individual point of a complaint is set out followed by what was found in the investigation, and details of the reasons for the decision on that point by setting out the facts and conclusions.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaints Policy – Section 8.4(k), page 32	The Complaints Policy states that additional complaints raised during the investigation that are related to the original complaint will be incorporated into the stage 1 response. If after the response to stage 1 is issued and the resident raises a further complaint regarding an issue unrelated to the first complaint, this is logged as a new complaint.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Stage 1 decision letter template	The stage 1 decision letter template includes the required information.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy – Section 8.5, pages 32-35	The Complaints Policy has a stage 2 process for escalating the complaint should the complaint not be resolved to the residents' satisfaction after stage 1. Stage 2 is the Council's final response.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within 5 working days of the escalation request being received.	Yes	Complaints Policy – Section 2.6, page 6, Section 3.14, page 16, Section 8.5(g), page 33	The Complaints Policy sets out that stage 2 complaints must be acknowledged within 5 working days of receipt.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Complaints Policy – Section 8.5(h), page 33-34	The Complaints Policy states that residents must not be required to explain their reasons for requesting their complaint to be escalated to stage 2, however the investigating officer may undertake reasonable efforts to understand why the resident remains unhappy as part of the stage 2 response. The investigating officer will: • Make sure the complaint is clear • Consider the complaint against any document submitted by the resident and/or associated with the complaint • Check the stage 1 process has been completed • Consider any new evidence • Review with the service Manager, the reasons for their stage 1 conclusion/decision in order to build a full picture as to how the decision was arrived at • Consider whether an interview with the resident would be helpful to the investigation. However, any request for an interview is optional and refusal by a resident will not negatively impact an investigation • Consider the issues afresh for themselves • Consult Legal Services if there are any doubts about the Council's statutory powers relevant to the issues

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				- Consider whether fast track action is required e.g. referral to another organisation/body or procedure for investigation - Decide upon their own findings in light of these considerations - Write to the resident setting out their findings
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy – Section 8.5(c), page 32	The Complaints Policy states that the relevant Deputy Chief Executive/Chief Executive will identify/nominate an investigating officer independent of the stage 1 decision. The person will normally be a representative from management other than the line manager e.g. the head of service or the relevant Deputy Chief Executive/Chief Executive may choose to investigate personally.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days of the complaint being acknowledged.</u>	Yes	Complaints Policy – Section 2.6, page 6, Section 8.5(g), page 33 Proportion of stage 2 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales 2025-26 – 93.3%	The Complaints Policy sets out that stage 2 complaints must be responded to within 20 working days of the complaint being acknowledged.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint	Yes	Complaints Policy – Section 2.6, page 7, Section 3.16, page 17, Section 8.5(g), page 33	The Complaints Policy sets out that if it is not possible to provide the resident with a full response within the 20 working day timescale, the resident must be told whether an extension will be applied, when to expect a reply, and the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.		Stage 2 extension to 20 working day response timescale letter template	reasons for the extension clearly explained. Any extension must not be more than 20 working days without good reason.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy – Section 3.16, page 17 Stage 2 extension to 20 working day response timescale letter template	The Complaints Policy sets out that the resident must be provided with the contact details of the Ombudsman. The Ombudsman contact details are included in the stage 2 extension to the 20 working day response timescale letter template.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaints Policy – Section 8.5(l), page 34 Complaints Policy – Section 8.5(q), page 35	The Complaints Policy states that the response must be provided when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Therefore, decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress. The Complaints Policy states that any outstanding action to resolve the complaint will be tracked and actioned promptly with appropriate updates provided to the resident.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	Stage 2 decision letter template	The stage 2 decision letter template is structured so that each individual point of a complaint is set out followed by what was found in the investigation, and details of the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	referencing the relevant policy, law and good practice where appropriate.			reasons for the decision on that point by setting out the facts and conclusions.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Stage 2 decision letter template	The stage 2 decision letter template includes the required information.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Stage 2 is the Council's final response. The Complaints Procedure does not have a further stage for consideration by the Council.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Complaints Policy – Section 11, pages 39-40	The Complaints Policy states that remedies for complainants under the procedure will normally take the form of putting things right and an apology. The options for redress are any, or a combination, of: • an apology where appropriate; • an explanation of the events or policy concerned; • agreeing to change a decision or action; • agreeing to put right a mistake or the consequences of a mistake; • a review of a policy or project, or its implementation, to take into account the complaint; • improving communication to staff or the public to avoid the same grounds for complaint as previously; • improving staff training to eliminate the root cause of the complaint. Any remedies that will be taken are set out in the complaint decision letter.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy – Section 11, page 39-40	The Complaints Policy recommends that complaint handlers refer to Local Government & Social Care Ombudsman and Housing Ombudsman guidance on remedies. Key questions in considering an appropriate remedy include: • What outcome does the complainant want to achieve by complaining? • What has gone wrong? • What is the personal injustice?

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				• Can action be taken to put the person affected back in the position they would have been in if nothing had gone wrong? • Is there an actual quantifiable financial loss, such as costs incurred or payments not received? • On what basis can loss of non-monetary benefit be calculated? • How severe was any other impact in terms of distress, harm or risk? • Did the actions or inactions of the complainant or a third party contribute to or lessen the injustice? • Is there a more appropriate form of payment than monetary? • Overall, is the remedy proportionate, appropriate and reasonable?
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Stage 1 decision letter template Stage 2 decision letter template	The decision letter will clearly set out any remedial actions. Such actions are logged on the complaints management system. The Housing Service will be taking steps to monitor actions that arise from complaints. These will be reviewed by the Housing Complaints Panel.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy – Section 11, page 39-40	The Complaints Policy recommends that complaint handlers refer to Local Government & Social Care Ombudsman and Housing Ombudsman guidance on remedies.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by	Yes	Complaints Performance and Service Improvement Report for the Housing Landlord Service (2025-26)	The annual complaints performance and service improvement report for 2025-26 has been produced containing the required information.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Complaints relating to the Council's housing landlord function webpage	The 2025-26 annual complaints performance and service improvement report is being reported to the Council's governing body (Cabinet) on 24th September 2026. Then it will be published on the 'Complaints relating to the Council's housing landlord functions' page of the website alongside Cabinet's response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Not applicable at this time.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		To date there has not been an instruction from the Housing Ombudsman to review and update the self-assessment.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their	Yes	Cyber Security Strategy Cyber Incident Playbook Information Security Policy	The Council has various strategies, policies and plans in place for exceptional circumstances, including cyber incidents. The Council's Communications Team is responsible for providing information to residents who may be affected, such as through social media channels and the website. Where the housing landlord service is unable to comply with the Code due to exceptional circumstances, this will be communicated to residents and the Ombudsman.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	website Landlords must provide a timescale for returning to compliance with the Code.		Business Continuity Plans Risk Registers	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes		In 2025-26, the majority of housing landlord related complaints were received online (40.75%) and by email (47.22%). Satisfaction with complaint handling decreased by -3.9% since last year where the tenant satisfaction measures survey carried out in 2024-25 reported 35.9% of respondents were satisfied with approach to complaints handling compared to 32.0% this year. While the score is low, it is about average when benchmarked with other providers. The Housing Service will continue to learn from Tenant Satisfaction Measures and Surveys to improve the service received and identify changes that can be made.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to	Yes		The Housing Service uses complaints as a source of intelligence and learning. A Housing Complaint Panel, chaired by the Member for Complaints, has been set up to scrutinise complaint handling performance and further drive forward a positive complaint handling culture (as covered in 9.7).

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	identify issues and introduce positive changes in service delivery.			To ensure continuous learning from complaint handling is practiced routinely, the Housing Service will be developing an audit tool to carry out regular audits on complaints handled to identify efficiency and whether any service improvements should be made.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Audit Board Report and meeting minutes Housing Advisory Board reports and meeting minutes Cabinet reports and meeting minutes Overview and Scrutiny Committee reports and meeting minutes Residents Annual Report	The Council's Audit Board receives an annual report from the Corporate Complaints Officer on complaints activity for all complaints across the various Council services in the previous year, including landlord related complaints. The Audit Board committee reports are publicly available on the Council's website. In terms of Housing Service complaints, performance and learning from complaints has been reported to the Council's Housing Advisory Board on a quarterly basis since October 2022. The Housing Advisory Board is made up of elected Members, senior Officers and representatives from the Dartford Tenants and Leaseholders Forum. One of the main purposes of the group is to have oversight of, and act in an advisory role, in relation to the statutory housing governance requirements set out by the Regulator of Social Housing. This Board considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to the decision-making body (Cabinet) as appropriate. Complaint handling performance by way of a quarterly Housing Service Update Report has been reported to the Council's governing body (Cabinet) since October 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Complaint handling performance by way of an annual report has been reported to the Overview and Scrutiny Committee since January 2025. Complaints handling performance and learning from complaints is reported in the Residents Annual Report to tenants and leaseholders.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		The Head of Legal Services is the Council's Corporate Complaints Officer and has overall responsibility for the Complaints Procedure and its administration and maintenance. The Corporate Complaints Officer remains independent of any decisions, but may give guidance and advice on procedure. The Leadership Team is responsible for the effective operation of the Complaints Policy within their areas of responsibility. Each member of the Leadership Team will nominate a Senior Officer as a Directorate/ Departmental Complaints Officer (DCO), responsible for ensuring that complaints are dealt with in accordance with the Complaints Procedure. The Leadership Team is responsible for discussing with their managers, patterns of complaints and possible service improvements etc. with a view to remedying any acknowledged deficiencies as quickly as possible.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed	Yes		The Council's Member Responsible for Complaints (MRC) is the Council's Cabinet Portfolio Holder for Housing (also the chairman of the Housing Advisory Board – see 9.3).

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Housing Service Update Report – Q1 2025-26 Housing Service Update Report – Q2 2025-26 Housing Service Update Report – Q3 2025-26 Housing Service Update Report – Q4 2025-26	The MRC is supported by the Housing Service in their role to ensure the governing body (Cabinet) receive regular information and insight on complaints, and access to suitable information and staff. This is by way of a quarterly Housing Service Update Report..
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling;	Yes		The MRC receives the required information at the quarterly Housing Advisory Board meeting and Cabinet meetings and this is recorded in the minutes (see 9.3 and 9.6). The MRC is consulted on the annual complaints performance and service improvement report which will be reported to the Housing Advisory Board to consider and comment on it before being reported to Cabinet. To further enhance the role and involvement of the MRC in scrutiny and oversight of complaints, a Housing Complaint Panel, chaired by the MRC, has been set up to scrutinise complaint handling performance and further drive forward a

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			positive complaint handling culture. Feedback from this panel are fed into the quarterly Housing Service Update reports presented to the Housing Advisory Board, Cabinet and annually to the Overview and Scrutiny Committee.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with	Yes	Complaints Policy – Section 2, pages 4-6	The Complaints Policy contains the objectives in relation to complaint handling for all relevant employees and third parties, which include to: • accept that things can go wrong but that the Council can put things right and learn from its mistakes; • provide residents with an effective way to complaint about Council services; • if possible, resolve complaints straight away; • deal with complaints fairly and consistently; • define the standards the public can expect when they make a complaint; • recognise the importance of complaints in providing feedback about Council services and performance; • set out how the Council will monitor complaints, and use that information to improve services and identify training needs;

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	complaints as set by any relevant professional body.			ensure that residents are entitled to have the same access to the procedure, regardless of whether the service is being provided by the Council or a contractor.