



Annual Housing Complaints Report

*Including Self-Assessment Against the Housing Ombudsman
Complaint Handling Code*

2024 - 2025

Approved at Housing Operations Board 14 May 2025

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Summary

This annual report sets out Housing Services' complaints performance for 2024/25, providing trend analysis and comparative data against the previous year (2023/24). In line with new requirements introduced from 1 April 2024, all social housing landlords are required to publish a dedicated annual complaints report. This report responds to that obligation and provides a detailed account of how complaints have been managed, resolved, and used to drive service improvement.

Our complaint handling approach is aligned with the principles of the **Housing Ombudsman's Complaint Handling Code**, ensuring accessibility, transparency, and fairness for residents. We continue to emphasize early intervention and proactive engagement with customers, enabling issues to be addressed at the earliest opportunity. This approach has encouraged greater ownership and accountability among colleagues, contributing to a reduction in the number of formal complaints logged.

Background

This is the second annual report we have published since we began reporting on complaints performance. It covers a two-year period, providing data from April 2023 onwards. In addition to volumes and timeliness, the report also highlights recurring themes and lessons learned, with a focus on how these insights have informed service improvements.

While we have made progress, we acknowledge that performance in responding to complaints - particularly timeliness - has been inconsistent. This has impacted resident satisfaction. In response, we have introduced a Housing Improvement Plan to deliver a step change in how housing services are delivered, and complaints are handled.

The most common causes of complaints relate to communication and delays in progressing works. We are starting to see improvements in how we engage with residents across Housing Services, supported by a new governance approach.

To strengthen oversight and responsiveness, all open complaints and enquiries are now reviewed fortnightly at the Director-led Senior Management Team meeting. This ensures appropriate allocation, timely responses, and shared accountability. A historic backlog has been successfully cleared, and we have embedded processes to maintain oversight and drive continuous improvement.

While we recognise there is more to do, we are committed to improving our complaint handling performance month by month - rebuilding trust and improving resident satisfaction as we deliver on our commitments.

Complaints update

The Council operates a two stage complaints procedure. At stage 1, we aim to respond to complaints within 10 working days of receipt and at stage 2, within 20 working days from receipt. If additional time is required to provide a response, the resident would be notified of a new date the response will be issued. In most cases this would be no more than 10 working days.

This report provides data on the volume and types of complaints recorded and our response timescales across a number of housing related services and includes: -

- Technical Services – Repairs and maintenance of Housing Revenue Account (HRA) properties
- Landlord Services – Management of tenancies within the HRA
- Housing Services – Allocations, homelessness and housing advice
- Case Services – Garages, changes to banding, OT requests, moving home and waiting lists

Although categorised by Specialist Service, the complaint enquiry could equally relate to work that is undertaken with customer and case, finance or other services that support the overall provision of the service.

Performance overview

Complaint volumes

The table below shows complaint volumes by categories over the last two years.

	2023/24					2024/25				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
Service requests	1	4	1	0	6	1	0	5	7	13
Stage 1	60	66	64	56	246	60	57	70	114	301
Stage 2	4	1	10	5	20	3	4	7	8	22
MP/ME enquiries	22	14	47	53	136	34	33	65	54	186
Ombudsman Cases	0	0	2	0	2	1	2	1	0	4

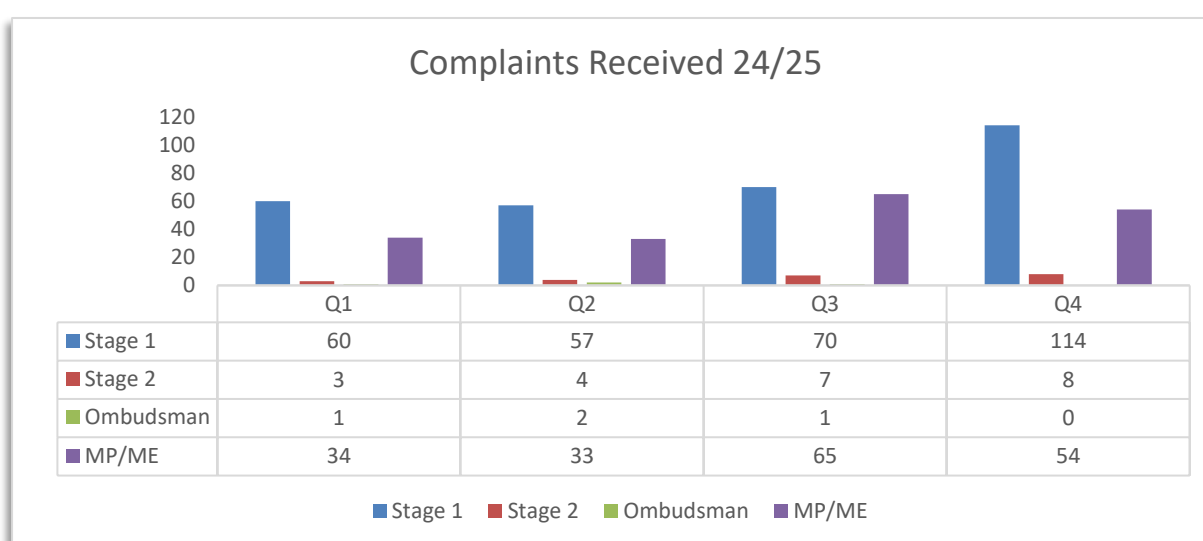
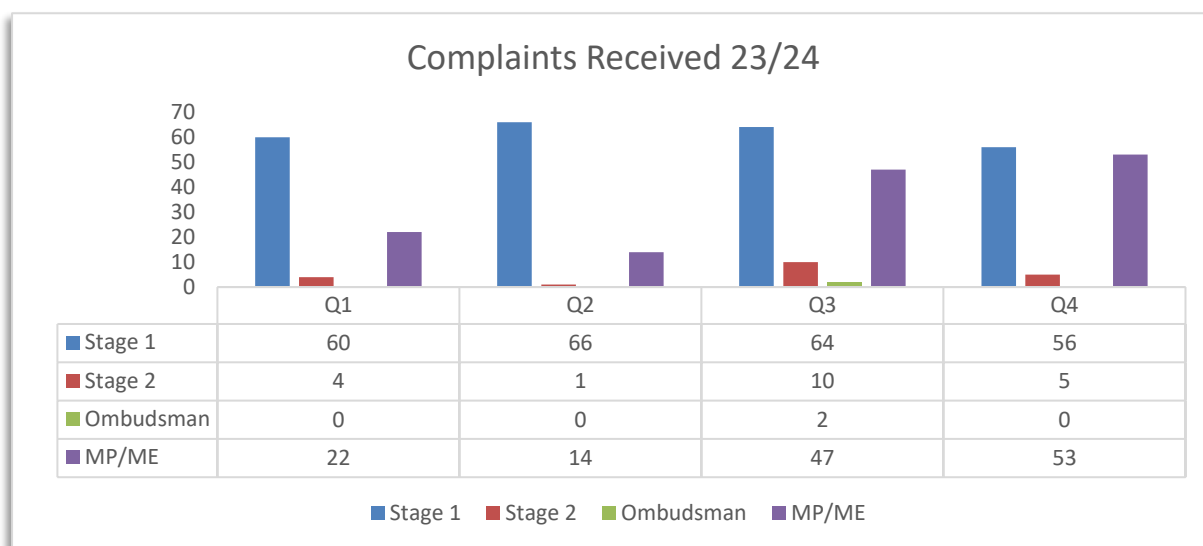
The **total number of complaints (Stages 1 and 2)** increased from **266 in 2023/24 to 323 in 2024/25**.

- **Stage 1 complaints** rose by **18%**, from 255 to **301**, with the most significant increase occurring in **Quarter 4**.
- Of the 301 Stage 1 complaints received, **22 cases (7%) were escalated to Stage 2**.
- **Stage 2 complaints** increased by **9%** compared to the previous year.

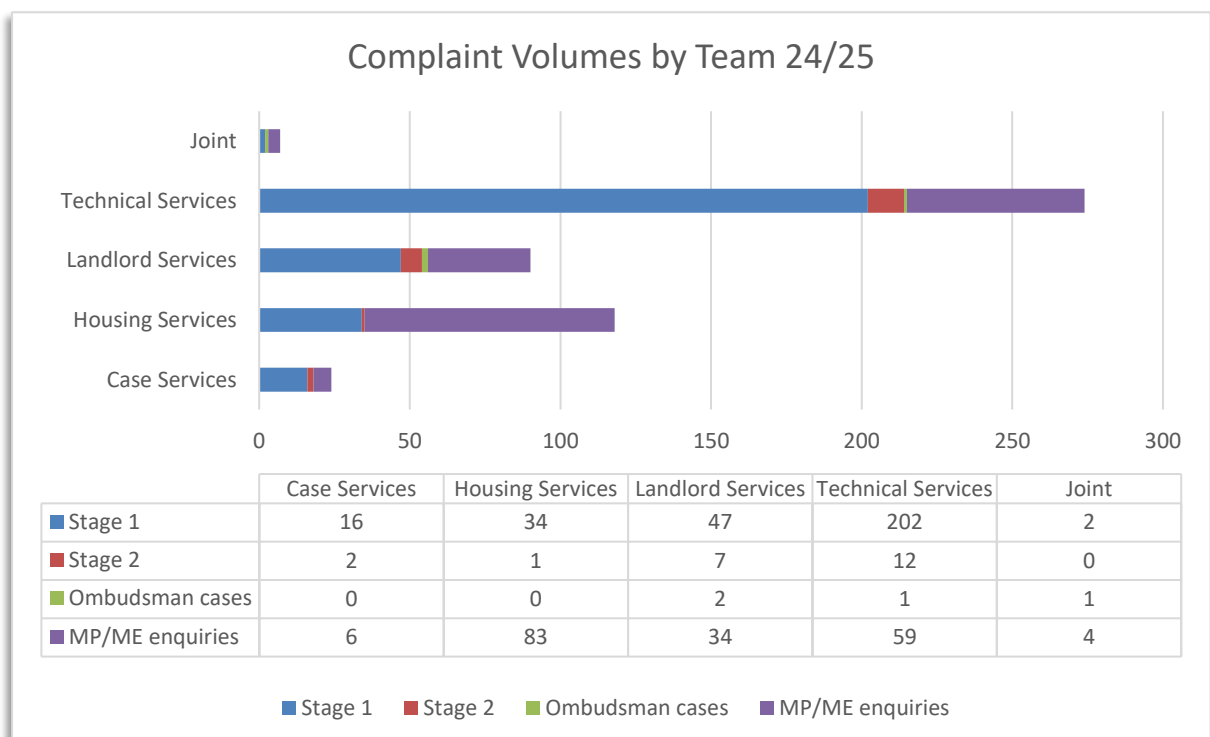
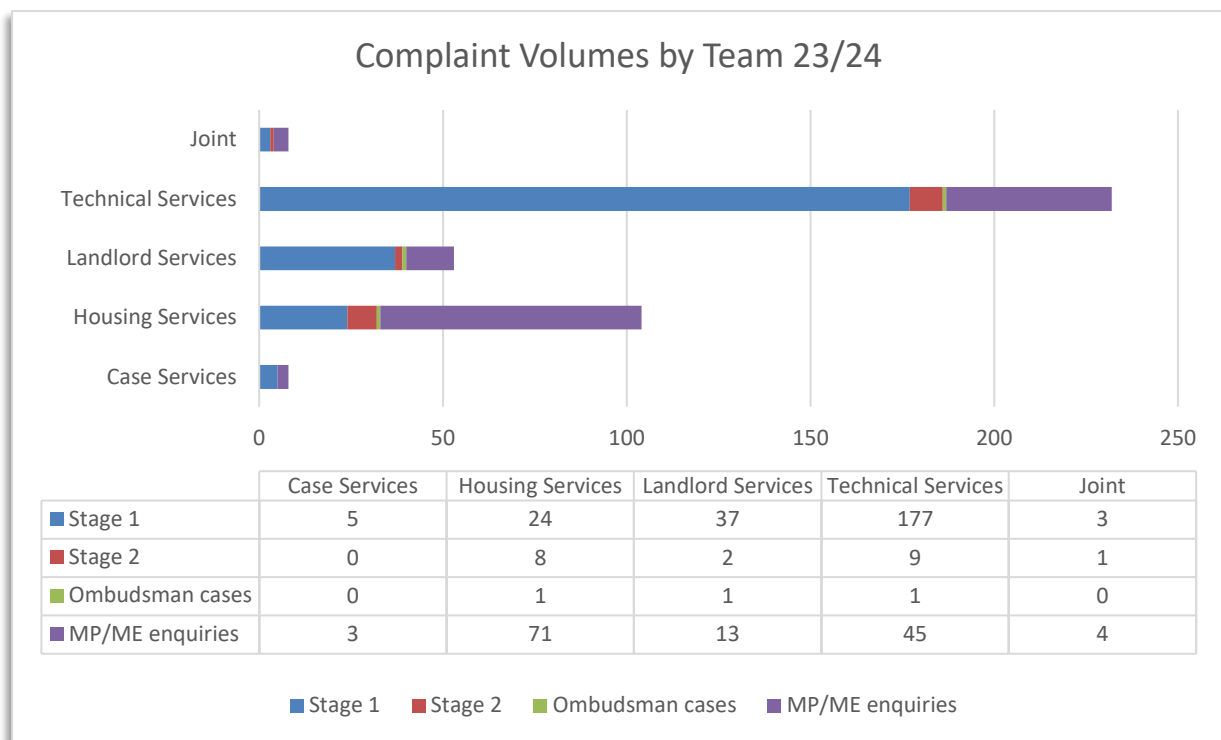
In addition, **MP and Member Enquiries (MP/MEs)** rose by **27%** during 2024/25.

We are not aware of any complaints being refused or rejected during the reporting year. In some instances, residents have chosen to pursue alternative resolution routes outside the formal complaints process. These include **legal proceedings, service charge disputes, and disrepair claims**.

Complaints Received

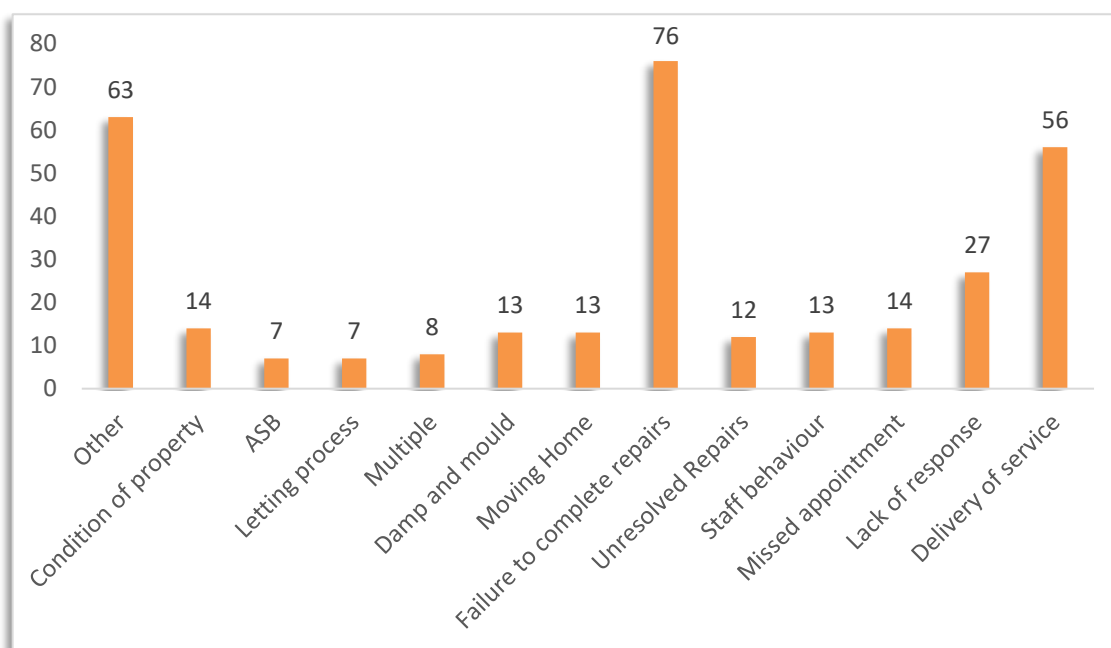


Complaints Volumes by Teams



Most complaints at Stage 1 related to the Technical Services Team and increased in Q3 & Q4.

Complaints Issues



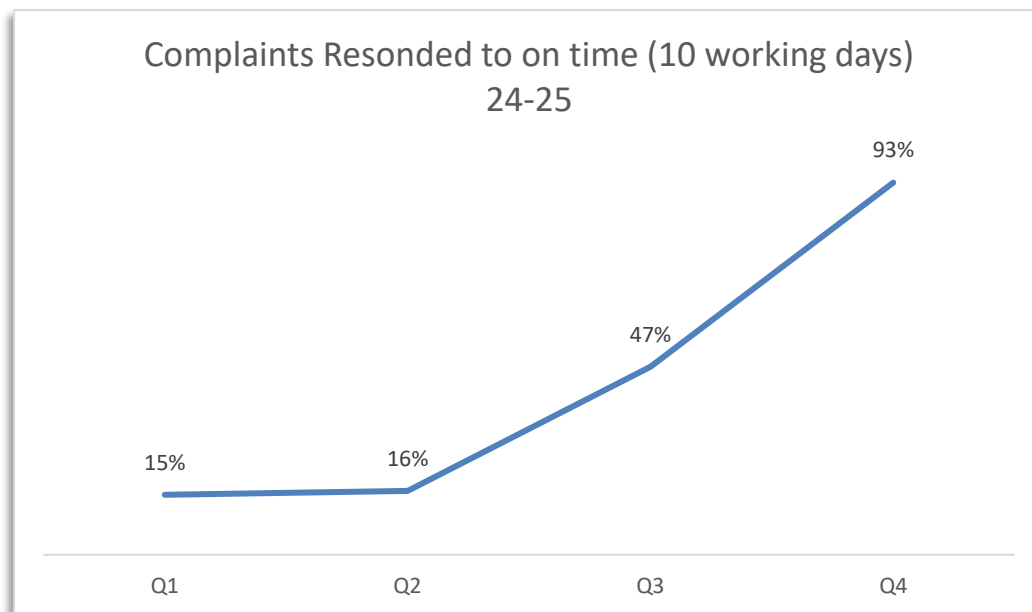
In terms of issues, the most prevalent reasons to complain were “failure to complete repairs” and “delivery of service”.

Timeliness

On average 44% of all stage 1 complaints were answered on time in 2024/25. This is far below the target response time. However, there was a significant improvement in performance in Q4 and 93% of stage 1 complaints were responded on time as can be seen in the table below. The improvement in performance was due to the introduction of the additional step in our housing complaints process. Staff who are assigned a complaint are required to contact the complainant within 24 hours of receiving the complaint and agreeing a resolution.

On average, 65% of stage 2 complaints were answered on time.

It is disappointing that residents who have had the cause to complain did not receive a timely response to their concerns. This has been an area of continued focus in 24/25 as we know that dealing with complaints quickly and effectively is valued by residents and a key driver of resident satisfaction.



Outcomes

In 24/25, 116 stage 1 complaints (39%) were upheld and 22 (7%) were partially upheld. Of the stage 2 complaints, 10 (45%) were upheld and 4 (18%) partially upheld.

Resident Satisfaction with complaint handling

The consumer regulation requires all landlords to understand tenant satisfaction in relation to various services across housing, these are all set out as tenant satisfaction measures. This is so residents and landlords can see how well they are performing. One of the areas that feedback is sought is around satisfaction with complaint handling.

Residents were contacted at random by an independent organisation and asked a series of standardised questions.

In 24/25, 22% of residents were satisfied with our approach to complaint handling. Whilst this percentage is on average low across the sector, based on the TSMs headline report (Nov 24), our satisfaction is below the average median.

We recognise satisfaction in relation to complaint handling can be more challenging if the resident's desired outcomes cannot be met, however, more detailed analysis of the experience of residents who complained has shown that satisfaction improves when:

- We engage well with residents throughout the complaint journey to demonstrate we have listened to them and understood the problem
- We respond quickly to the complaint, carrying out the necessary actions within the timeframes we set
- Responses are clear, fair and thorough, and the explanation helps the resident make sense of what has happened

Ombudsman Complaints

The Housing Ombudsman have three stages to their approach; triage, information request stage and determined cases.

They provide determinations on a case, but within this, reach an individual finding in relation to each complaint issue investigated. Any finding of severe maladministration, maladministration or service failure contributes to the overall maladministration rate.

We had four cases that escalated to the Housing Ombudsman Service in 2024/25.

We were responsible for maladministration in the handling of repairs, damp & mould and service failure in handling three complaints. We were ordered to pay £600 compensation to one resident, £1,400 to the second resident and £2,230 to the third resident.

One complaint had not been through our complaints process. We notified the Ombudsman and logged this as a stage 1 complaint and responded to it within target. There were no further actions or orders.

There was a request from the Ombudsman to look through the other complaint. The complaint was investigated and responded to accordingly. There were no further actions or orders.

Learning and Service Improvement

Complaints provide valuable feedback, and we encourage staff to view these as a positive opportunity to learn from experiences to drive continuous improvement and prevent similar issues happening again.

For staff, complaints provide a first-hand account of the customer's views and experience, and resolving complaints early saves resources and creates better customer relations.

The following learning and improvements were identified:

- To help improve our response times, we introduced an additional step as part of the complaints process. Staff who are assigned a complaint are required to contact the complainant within 48 hours of receiving the complaint and agreeing a resolution.
- Introduced weekly complaints meetings with the repairs managers to discuss open complaints/enquiries, agreeing actions and timescales.
- Senior Management Team get sight of all outstanding complaints/enquiries every 2 weeks and these meetings are Director led.
- Improved complaint handling practice to ensure responses were timely, accurate and addressed the complaint issue thoroughly.

- We have strengthened our approach to damp and mould through implementing quicker response times for both surveying properties and reducing the risk to tenants.
- To ensure a consistent approach to complaint handling, a Complaints Lead has been appointed as part of the Corporate Customer Services Team.
- We have updated our Repairs, Planned Maintenance and ASB policies to ensure they are in line with current legislative and regulatory requirements and reflect best practice.
- Importance of communication and keeping tenants updated.
- Recommendations and agreed actions are tracked at stage 1 and stage 2 to ensure we keep promises to tenants and reduce the escalation rate.
- Ensuring Guildford Borough Council's policy and procedures are followed when responding to complaints

Priorities for 2025/26

Our focus in 2025/26 will be on strengthening how we learn from complaints and ensuring that insights lead to tangible service improvements. The following priorities have been identified:

1. Embed Learning and Improve Customer Outcomes

Strengthen our approach to **addressing root causes of complaints**, with a focus on service redesign where patterns emerge.

Promote a **culture of learning** across all housing teams by sharing complaint insights and encouraging team-based reflection on common themes.

2. Strengthen Feedback Mechanisms

Commission **Acuity Research** to carry out quarterly transactional surveys on complaint handling. Feedback from these will directly inform service improvements.

Implement a clear and consistent approach to **learning from complaints and resident feedback**, led by the Complaints Resolution Officer.

3. Improve Support for Vulnerable Residents

Enhance how we **identify, record, and respond to vulnerable residents**, ensuring their needs and circumstances are properly understood and reflected in our responses.

4. Improve Repairs Handling and Communication

Ensure repairs are completed in line with service level agreements, with a particular focus on:

Accurate job recording

Better communication about outstanding work

Text message updates to confirm appointments and track progress

Work with contractors to **agree clear priority areas for improvement** and strengthen accountability.

5. Strengthen Complaint Recording and Follow-Up

Improve how we record **complaint refusals**, to better understand underlying causes and trends.

Develop an **aftercare approach** that maintains engagement with residents on unresolved actions, reducing the need for repeat complaints.

6. Ensure Regulatory Compliance

Work across Housing Services to ensure full compliance with the **2025 Housing Ombudsman Complaint Handling Code**, embedding best practice standards in all aspects of complaint handling.

Conclusion

Housing Services has taken clear steps to improve complaint handling and deliver better outcomes for residents. We remain committed to working with residents to create more responsive, accountable, and resident-focused services.

Crucially, we are using complaints and feedback to drive improvements where they are most needed - particularly in areas such as repairs, communication, and responsiveness. Our focus remains on early resolution, continuous learning, and improving the overall resident experience.

While the Council has not been cited in any **Housing Ombudsman spotlight reports** or **severe maladministration cases**, we recognise the importance of learning from these publications to strengthen our practice and avoid similar failings.

The Council continues to:

- **Publicise its complaints policy** on the website and in resident communications
- **Publish the self-assessment** against the Housing Ombudsman's Complaint Handling Code (appendix A in this document).
- Commit to transparency by making this annual report publicly available following governance approval

These actions reflect our commitment to regulatory compliance, continuous improvement, and delivering a high-quality service that residents can trust.

Appendix A: Self-Assessment Against the Housing Ombudsman Complaint Handling Code

In line with the requirements of the Housing Ombudsman's Complaint Handling Code, all social landlords must complete and publish an annual self-assessment of their compliance with the Code. This is intended to ensure transparency, accountability, and continuous improvement in complaint handling practices.

Guildford Borough Council's self-assessment was completed by the Complaints Resolution Officer and formally reviewed and approved by the **Housing Operations Board on 14 May 2025**. It forms an integral part of our annual complaints performance and service improvement reporting.

The completed self-assessment is published alongside this report and will be made available on the Council's website, in accordance with the Ombudsman's requirements.

1. Section 1: Definition of a complaint

Our Complaints Policy can be assessed using the following link: [What complaints do we deal with? - Guildford Borough Council](#)

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	Section 3 of our complaints policy defines a complaint as: "A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the council, its own staff, or those acting on its behalf, affecting an individual or a group of individuals."	We have expanded our explanation within the policy to provide examples of complaints we may see.
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	Section 8 of our complaints policy says: " Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint and does not have to use the word 'complaint' for it to be treated as such." Section 5 of our policy sets out that anyone can make a complaint, including third parties on behalf of an individual.	As set out in our Complaints Policy.

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	Section 4 of our policy defines the matters that are not complaints, including: "First time customers making a request for a service (such as removal of fly-tipping, missed waste collection, reporting noise nuisance, or reporting a housing repair)."	As set out in our Complaints Policy
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 request if the resident complains.	Yes	Section 3 of our policy states that a complaint can be about: "A failure to deliver a service which meets reasonable expectations".	When such circumstances occur, we will continue to seek to provide a resolution to the service request, whilst processing their complaint in line with our policy.

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		We have recently procured a third party provider, Acuity Research, to carry out service satisfaction surveys on our behalf. We will be conducting monthly responsive repair surveys via email & telephone, in addition to quarterly ASB and lettings surveys. Acuity Research will ask the following question; “Would you be happy for Guildford Borough Council to contact you to follow up any of the comments or issues you have raised?” At this point we will make direct contact with the respondent and provide details of how they can complain where necessary.
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2. 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	Section 8 of our policy says: "Each complaint will be considered on its own merits" Section 4 of our policy sets circumstances where our complaints policy cannot be used. Furthermore, this section says: "If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman."	As set out in our complaints policy.
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	Yes	Section 4 of our policy sets circumstances where our complaints policy cannot be used.	As set out in our complaints policy.

	the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under 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 where there are good reasons to do so.	Yes	Section 6 of our policy says: “We will accept complaints referred to us within twelve months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds (set out above). We will consider whether to apply discretion to accept complaints made outside this time limit on a case-by-case where there are good reasons to do so.”	As set out in our complaints policy.
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	Section 4 of our policy states “If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.”	As set out in our complaints policy.
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	Section 8 of our policy states “Each complaint will be considered on its	As set out in our complaints policy.

	must consider the individual circumstances of each complaint.		own merits and will consider the individual circumstances of each complaint and does not have to use the word 'complaint' for it to be treated as such.	
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3. 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	Section 7 of our complaints policy says: "We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online and that when making a complaint, support with the process is available from our Customer Services team, who can assist with any issues.	As set out in our Complaints Policy.
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 to the appropriate person within the landlord.	Yes	Section 7 of our complaints policy says: "We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online.	Our recently appointed Complaints Lead will be introducing mandatory training for all customer facing staff in addition to enhanced training for senior staff, to ensure they have the relevant knowledge and skills to be able to competently raise complaints on behalf of residents.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and	Yes	Section 16 of our complaints policy says: "We will produce an annual complaints performance and	Our recently appointed Complaints Lead will be focusing on identifying and

	accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.		service improvement report for scrutiny and challenge”	addressing any signs of low complaint volumes, particularly at stage two. This includes ensuring that our complaints process is accessible and well-publicised, so residents feel empowered to voice their concerns. By actively monitoring and improving the process, we aim to encourage more feedback and ensure that all residents have the opportunity to raise their issues
3.4	Landlords must make their complaint policy available in a clear and accessible format for 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.	Yes	Section 1 of our policy says: “We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who do not have access to the internet.” Our complaints policy, and information about our complaints process is available via the council’s website: What complaints do we deal with? - Guildford Borough Council.	Our Complaints Lead is currently working on enhancing our communication regarding the complaints process. We aim to incorporate a summary and/or link to the detailed complaints procedure within our acknowledgment, stage one, and stage two responses. This will ensure that all residents have easy access to clear information about the two-stage process, what to expect at each stage, and the timeframes for responses.

				Additionally, we will continue to make this information available on our website and in printed form upon request for those without internet access
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	Section 1 of our policy says: “We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who do not have access to the internet.” Section 12 of our policy provides information for complainants on how to contact the relevant Ombudsman.	The Council continues to advertise it’s complaints policy on the Council’s website and in correspondence with residents. A copy of the Council’s self-assessment against the Housing Ombudsman’s complaints handling code is also available on the Council’s website along with a copy of this report once it has been through the relevant governance procedures. Our complaints policy, and information about the Ombudsman and this Code is available via the council’s website: What complaints do we deal with? - Guildford Borough Council
3.6	Landlords must give residents the opportunity to have a representative deal	Yes	Section 5 of our policy says: “The affected person may choose for	As set out in our Complaints Policy.

	with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		someone else to complain on their behalf such as a relative, carer or friend”	
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	Section 12 of our policy provides information for complainants on how to contact the relevant Ombudsman.	As set out in our Complaints Policy.

4. 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	Assistant Directors for Housing, Communities and Environment - Guildford Borough Council	The Assistant Director of Communications and Customer Services has overall responsibility for complaint handling. They are supported in this role by the Customer and Case Services team. There is a dedicated Complaints Resolution Officer in the Housing Department. A dedicated Complaints Lead was appointed in March 2025 and will have oversight of complaint handling throughout the organisation, in addition to being the point of contact with the Housing Ombudsman Service and the Local Government and Social Care Ombudsman
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 and autonomy to act to resolve disputes promptly and fairly.	Yes	Section 1 of our policy says: "This document sets out our approach to dealing with customer complaints and ensuring that complaints are	Our Complaints Lead is part of the Management Team, which ensures they have access to staff at all levels. This positioning allows them to

			investigated in an evidence-based, fair, and efficient way.”	facilitate the prompt resolution of complaints effectively. Additionally, they have the authority and autonomy to act swiftly and fairly to resolve disputes.
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	Section 16 of our policy says: “We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery. We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website”	We have recently appointed a new Complaints Lead who is dedicated to enhancing our complaint handling processes. This new role is responsible for managing statutory, corporate, and Ombudsman complaints. The Complaints Lead will be instrumental in delivering customer-focused advice, managing complex complaints, and supporting directorates with effective complaint handling.

5. Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	Section 8 of our policy states that “Our complaints procedure Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint and does not have to use the word ‘complaint’ for it to be treated as such. At each stage of the complaints process, our complaint handlers will: • Deal with complaints on their merits, act independently, and have an open mind. • Give the complainant a fair chance to set out their position. • Take measures to address any actual or perceived conflict of interest. • Consider all relevant information and evidence carefully.”	Our complaints policy covers all statutory, corporate and Ombudsman complaints.
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	Section 2 of our policy states that we seek to resolve customer complaints at the earliest stage possible. Section 8 of our policy explains that we have a two-stage complaints procedure.	Whilst we do not have an informal or zero stage complaint, service requests and appeals relating to certain Council decisions will be dealt with outside of the complaints policy where more appropriate.

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	Section 8 of our policy explains that we have a two-stage complaints procedure.	As set out in our Complaints Policy.
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 two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes		No complaints are handled by any third parties on our behalf.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		No complaints are handled by any third parties on our behalf.
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	Section 8 of our policy says: "A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received." "A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."	As set out in our complaints policy.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which	Yes	Section 8 of our policy says:	Our Complaints Lead will be reviewing our overall

	aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.		“A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received.” “A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received.”	processes to ensure that clear and consistent acknowledgments are sent across all service areas. This includes making sure that we clearly identify which aspects of a complaint we are responsible for and clarifying any areas of uncertainty. By doing so, we aim to provide transparency and build trust with our residents throughout the complaint handling process
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	Section 8 of our policy states that “Our complaints procedure Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint and does not have to use the word ‘complaint’ for it to be treated as such. At each stage of the complaints process, our complaint handlers will: • Deal with complaints on their merits, act independently, and have an open mind. • Give the complainant a fair chance to set out their position.	As set out in our Complaints Policy.

			• Take measures to address any actual or perceived conflict of interest. • Consider all relevant information and evidence carefully.”	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Section 8 of our policy says: For Stage 1 complaints: “If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” For Stage 2 complaints: “The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2	As set out in our Complaints Policy.

			outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.	
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	Section 15 of our policy says: " We will comply with the Equality Act 2010, and where appropriate will make reasonable adjustments to our policy and procedure to accommodate an individual's needs."	Our complaints handling system has the option to allow the case inputter to record any special handling instructions. In addition to this, our Housing Management System, allows us to record disabilities. Training in relation to recognising disabilities, the need to make reasonable adjustments and how to record these will be rolled out to all customer facing staff.
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	Yes	Section 2 of our policy aligns with section 2 of the Housing Ombudsman's code. There are further exclusions included within this section that relate to the	As set out in our Complaints Policy.

	comply with the provisions set out in section 2 of this Code.		council's duties as a local authority, as opposed to its duties as a landlord. Section 4 of our policy sets out the circumstances where we would not consider a complaint though our complaints procedure. Section 8 of our policy deals with this at Stage 2 says "If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal"	
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	Section 13 of our policy says: "We will log all complaints and their outcomes at each stage in our complaints handling system."	Our complaints handling system enables us to record all of the information required here.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords	Yes	Section 10 of our policy states "We will ensure that any remedy we	As set out in our Complaints Policy.

	must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of detriment caused to the resident as a result."	
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	Section 19 of our policy states "We are committed to dealing with all complaints received fairly and impartially, however, there will be circumstances where individuals hinder consideration of complaints and need to be managed differently. We have a separate policy for such matters, which can be found on our website	As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances Policy.
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	Our Vexatious, Malicious and Persistent Grievances Policy (available on our website) says: "We will comply with the Equality Act 2010, and where required will adapt its policy and. procedure to accommodate an individual's needs. Any restrictions imposed on a customer's contact should recognise and be appropriate to their individual circumstances."	As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances Policy.

6. 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 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.	Yes	Section 2 of our policy says that one of the objectives of the policy is: "To resolve customer complaints at the earliest stage possible."	As set out in our Complaints Policy.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Section 8 of our policy states that "complaints will be logged, defined, and acknowledged within five working days of the complaint being received."	As set out in our Complaints Policy.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 8 of our policy says: "The response to a Stage 1 complaint will be sent within ten working days from complaint being acknowledged."	As set out in our Complaints Policy.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Section 8 of our policy says: For Stage 1 complaints: "If responding within ten working days is not	As set out in our Complaints Policy.

	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.		possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” For Stage 2 complaints: “The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your	
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			complaint and will provide you with the contact details of the relevant Ombudsman.	
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	Section 8 of our policy confirmed that we will provide the complainant with the contact details of the relevant Ombudsman.	As set out in our Complaints Policy.
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 must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 10 of our policy says: "When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion."	As set out in our Complaints Policy.
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	Section 9 of our policy says: "Complaint responses will 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."	As set out in our Complaints Policy.
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	Yes	Section 8 of our policy says that: "A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received."	We will use the acknowledgement of a complaint to ensure our understanding of definition of the complaint matches that of the resident. Should this acknowledgement raise any

	being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			further related issues following this, we will update our definition of the complaint to ensure effective response. Currently, should further issues be raised following the stage 1 response, we would process these as we would any other complaint using the definitions set out in sections 3 and 4 of our policy. Our Complaints Lead is currently carrying out the Annual Review of our Complaints Policy and will look to clear define the way we handle additional complaints raised during the course of an ongoing investigation to ensure consistency and clarity in our responses. This review will help us streamline our processes and ensure that all additional issues raised are handled efficiently and fairly, providing a better experience for our residents.
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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	These requirements are set out in Section 9 of our policy.	As set out in our Complaints Policy.
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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	Section 8 of our policy confirmed that right for a complainant to request for their complaint to be considered as an appeal under stage two of our process.	As set out in our Complaints Policy.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Section 8 of our policy says: "A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."	As set out in our complaints policy.

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	Section 8 of our policy says: "If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal." "A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."	Our complaints policy does not require residents to explain their reasons for requesting a stage 2 appeal. If we are not clear on the reasons for such a request, we will use the acknowledgment process to seek clarification. To further enhance this process, our Complaints Lead will be implementing staff training to help identify these requests more effectively. This initiative is in response to historical annual performance figures that have shown extremely low volumes of complaints progressing to stage two. By doing so, we aim to improve our understanding and handling of stage two appeals, ensuring a fair and thorough review process for all residents.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 8 of our policy states that the appeal will not be considered by the same person as the stage one complaint handler.	As set out in our Complaints Policy.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 8 of our policy says: "The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged."	As set out in our Complaints Policy.
6.15	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 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	For Stage 2 complaints: "The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.	As set out in our Complaints Policy.
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	For Stage 2 complaints: "The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2	As set out in our Complaints Policy.

			outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.	
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	Section 10 of our policy says: "When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion."	As set out in our Complaints Policy.
6.18	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	Section 9 of our policy says: "Complaint responses will 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."	As set out in our Complaints Policy.
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;	Yes	Section 9 of our policy says: "In a complaint response, we will include the following in clear, plain language:	As set out in our complaints policy

	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.		• The complaint stage. • The complaint definition. • The decision on the complaint. • The reasons for any decisions made. • The details of any remedy offered to put things right. • Details of any outstanding actions. • Stage 1: details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response. Stage 2: details of how to escalate the matter to the relevant Ombudsman if the individual remains dissatisfied.”	
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 8 of our policy says: “Stage 2 is our final response”	As set out in our complaints policy. The people mentioned in 4.1 above, who are collectively responsible for delivering the council’s complaints function, have access to officers at all levels to enable them to do deliver the council’s complaints function.

7. 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	Section 10 of our policy states the remedies offered by us when putting things right.	As set out in our Complaints Policy.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 10 of our policy says: “We will ensure that any remedy we offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of detriment caused to the resident as a result.”	As set out in our Complaints Policy.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement	Yes	Section 10 of our policy says: “When offering a remedy, we will	As set out in our Complaints Policy.

	with the resident where appropriate. Any remedy proposed must be followed through to completion.		set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion.”	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 10 of our policy says: “We will also take account of guidance issued by the relevant Ombudsman when deciding on appropriate remedies.”	As set out in our Complaints Policy.

8. 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 the Ombudsman in relation to the work of the landlord.	Yes	Section 16 of our policy says: "We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website."	As set out in our complaints policy; the annual report to Corporate Governance and Standards Committee will include all the information required by the code.

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	Section 16 of our policy says: "This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this."	As set out in our Complaints Policy.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 16 of our policy says: "We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to review and update the self-assessment following an investigation by the relevant Ombudsman."	As set out in our Complaints Policy.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 16 of our policy says: "We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to review and update the self-assessment following an investigation by the relevant Ombudsman."	As set out in our Complaints Policy.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances,	Yes	Section 18 of our policy says: "If we are unable to comply due to	Should an exceptional circumstance arise where we

	such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.		exceptional circumstances with this policy, or the Code of either Ombudsman, we will inform the relevant Ombudsman, provide information to residents who may be affected, and publish this on our website as soon as we can determine this within the scope of the issue.”	could not comply with the Code, as part of our wider business continuity planning, we would look to provide timescales to customers and residents on when are able to return to business as usual, including compliance with the Code
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9. 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	Section 2 of our policy says that one of the objectives of the policy is: "To ensure we learn from our mistakes to improve services where this is appropriate and to avoid repeat complaints" Section 16 of our policy says: "We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery."	Our Complaints Lead will be focusing on embedding a culture of learning and continuous improvement within our complaints process. By looking beyond the circumstances of individual complaints, they will identify opportunities for service enhancements based on the insights gained. This approach ensures that we not only address specific issues but also make broader improvements to benefit all residents.
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 identify issues and introduce positive changes in service delivery.	Yes	Section 2 of our policy says that one of the objectives of the policy is: "To promote accountability and transparency and an effective complaint handling culture." As set out in our complaints policy. 41 Code provision Code requirement Comply: Yes / No Evidence Commentary / explanation Section 16 of our policy says: "We are	Our Complaints Lead will be instrumental in fostering a positive complaint handling culture, which is essential for effectively resolving disputes. They will identify underlying issues and implement positive changes in our service delivery. This proactive approach ensures that we

			aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.”	make meaningful improvements that benefit all residents
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	Section 16 of our policy says: “We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website.” We produce an annual housing complaints report which is shared with the management team and the Tenants Engagement Panel and published online.	As set out in our Complaints Policy.
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	Assistant Directors for Economy, Planning and Place - Guildford Borough Council	Our recently appointed Complaints Lead is responsible for complaint handling, whilst the Assistant Director of Communications and Customer Services retains overall accountability for the

				provision of the complaints function within the council.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed 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').	Yes	The Executive - Guildford Borough Council	The Lead Member for Engagement and Customer Services is council's Member Responsible for Complaints.
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	Section 16 of our policy says: "We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this."	As set out in our complaints policy
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;	Yes		The Assistant Director of Communications and Customer Services and Complaints Lead will keep the Lead Member for Engagement and Customer Services regularly appraised of

	b. regular reviews of issues and trends arising from complaint handling; 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.			complaints as part of their regular briefings, updates and discussions.
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 complaints as set by any relevant professional body.	Yes	Section of our policy says: “our objective is for complaints to be handled in a way that reflects the need to: • Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. • Take collective responsibility for any shortfalls identified through complaints, rather than blaming others. • Act within the professional standards for engaging with complaints as set by any relevant professional body.”	As set out in our complaints policy.