



INDIVIDUAL CABINET MEMBER AND OFFICER DELEGATED DECISIONS

TUESDAY, 9 DECEMBER 2025

Please find enclosed Decision Notice in connection with the following:

ICMD20 Complaints Policy Review and Revision (Pages 2 - 50)

Please note that this is subject to call-in.

Queries regarding these documents

Please contact Liz Bateson, Democratic Support - email ebateson@lancaster.gov.uk.

Democratic Support,
Town Hall,
Dalton Square,
Lancaster,
LA1 1PJ

Published on TUESDAY, 9 DECEMBER 2025

**EXECUTIVE DECISIONS TAKEN BY CABINET PORTFOLIO HOLDER OR DELEGATED OFFICER
 NOTICE OF DECISION**

TITLE OF DECISION:			
COMPLAINTS POLICY REVIEW AND REVISION			
NAME OF DECISION TAKER:		SALLY MADDOCKS	
POSITION AND RESPONSIBILITY HELD:		CABINET MEMBER FOR CORPORATE SERVICES AND MEMBER WITH RESPONSIBILITY FOR COMPLAINTS.	
CONTACT OFFICER:		DAVID HOLME	
TELEPHONE:		01524 582089	
E-MAIL:		dholme@lancaster.gov.uk	
Details of Decision:			
<p>(1) That the <i>Complaints Policy (December 2025)</i> be approved as the Council's corporate policy for handling complaints following review and amendments suggested from the Housing Ombudsman.</p> <p>(2) That the updated Housing Ombudsman Complaint Self-Assessment is approved and published on the Council's website.</p>			
Reasons for the decision:			
<p>Following review by the Housing Ombudsman recommendations for changes were received to the Corporate Complaints Policy. Changing the Policy ensures the Council is compliant against the expectations of the Ombudsman in relation to the Joint Complaint Handling Code. The Council has also reviewed its self-assessment following this change.</p>			
IS THE DECISION URGENT			
No			
PLEASE DELETE AS APPROPRIATE AND GIVE REASONS FOR URGENCY BELOW:			
I confirm that I have taken account of the options proposed by officers, the various implications set out in the report and the comments of the Monitoring and Section 151 Officers and am authorising the decision as set out above.			
SIGNATURE OF DECISION TAKER:		Cllr Sally Maddocks	
DATE:		9.12.25	
<i>THIS SECTION TO BE COMPLETED BY DEMOCRATIC SERVICES</i>			REF NO.
			ICMD20
DATE DECISION TAKEN:	9.12.25	DATE RECEIVED BY DEMOCRATIC SERVICES:	9.12.25
DATE DECISION PUBLISHED:	9.12.25	IMPLEMENTATION DATE (publication day + 5 working days):	17.12.25

INDIVIDUAL CABINET MEMBER DECISION

Complaints Policy Review and Revision (December 2025)

Report of Chief Officer Housing and Property

PURPOSE OF REPORT			
To seek approval for the revised Complaints Policy (December 2025), which replaces the previous policy dated April 2024, ensuring compliance with the Housing Ombudsman Complaint Handling Code and addressing recommendations from the Ombudsman's review (September 2025).			
Key Decision	<input type="checkbox"/>	Non-Key Decision	<input checked="" type="checkbox"/> Referral from Cabinet Member
Date of notice of forthcoming key decision	N/a		
This report is public			

RECOMMENDATIONS OF CLLR SALLY MADDOCKS

- (1) That the *Complaints Policy (December 2025)* be approved as the Council's corporate policy for handling complaints.
- (2) That the updated Housing Ombudsman Complaint Self-Assessment is approved and published on the Council's website.

1.0 Introduction

- 1.1 The Housing Ombudsman reviewed Lancaster City Council's April 2024 Complaints Policy, as part of their sector wide review of social housing provider's complaints policies, and issued 21 recommendations to ensure compliance with the Complaint Handling Code at the end of September 2025.
- 1.2 The revised policy (Appendix A) addresses these recommendations, strengthens clarity for residents, and improves governance and accountability.
- 1.3 Following changes made the Housing Ombudsman Complaint Self-Assessment (Appendix B) has been updated.
- 1.4 Implementation and reporting of compliance is due to the Housing Ombudsman by 31 December 2025.

2.0 Proposal Details: Complaints Policy (December 2025)

2.1 The updated policy introduces:

- Clearer definitions of complaints vs service requests.
- Revised exclusions to ensure fairness and transparency.
- Stronger compliance with statutory timeframes and extension agreements.
- Explicit commitment to accessibility and representation rights.
- Clear process for raising additional complaints during investigations
- Formal review cycle every two years.

2.2 A more detailed account of changes made to the document can be found in the table below.

SECTION	APRIL 2024 POLICY	DECEMBER 2025 POLICY	CHANGE SUMMARY
WHAT IS A COMPLAINT?	Defined complaint per Ombudsman but stated: 'If this is the first time you are reporting an issue to us, we may decide to treat this as a request for service.'	Retains Ombudsman definition but adds examples of service requests and clarifies trigger for complaint.	Removed ambiguity; added practical examples; clarified trigger.
SERVICE REQUESTS	Mentioned difference but lacked examples and clarity.	Added explicit examples and process for recording service requests separately.	Improves clarity for residents and staff.
EXCLUSIONS	Listed 12 exclusions including policy disagreements, rent/service charge complaints, legal proceedings.	Removed blanket exclusions; clarified complaints can be raised until legal proceedings filed; added discretion for late complaints.	Aligns with Ombudsman recommendations; fairer and more transparent.
ACCESSIBILITY	Mentioned translation and home visits but no explicit commitment.	Explicitly states requests for accessible formats will be considered.	Strengthens accessibility compliance.
WHO CAN COMPLAIN	Required complainant to 'feel disadvantaged.'	Any individual or organization using council services can complain.	Removed restrictive wording; more inclusive.
COMPLAINT PROCEDURE OVERVIEW	Two-stage system stated but implied informal stage; Chief Executive could bypass process.	Confirms only two stages; removed informal stage references; deleted bypass clause.	Ensures compliance with Code.
ACKNOWLEDGEMENT & DEFINITION	Acknowledgements lacked definition and outcomes sought.	Includes definition, scope, and outcomes sought at both stages.	Meets Code requirements for transparency.
TIMEFRAMES &	Extensions at	Extensions must be	Resident-focused

EXTENSIONS	council discretion; no resident agreement required.	agreed with residents and include update intervals.	and compliant.
RAISING ADDITIONAL COMPLAINTS	No reference.	New section detailing process for related/unrelated issues during investigation.	Addresses Code requirement.
STAGE 2 REVIEW	Could be handled by Chief Officer for service complained about.	Must not be same person as Stage 1 investigator.	Ensures independence and fairness.
RESPONSES	Issued after all actions completed.	Issued when outcome known; outstanding actions tracked separately.	Improves timeliness and transparency.
MONITORING & REVIEW	No formal review cycle stated.	Policy reviewed every two years or sooner if required.	Adds governance and compliance assurance.

3.0 Details of Consultation

- 3.1 Given that the revisions to the Complaints Policy were made to address statutory compliance requirements and implement recommendations from the Housing Ombudsman, no tenant consultation was undertaken.
- 3.2 The changes do not alter the fundamental rights of tenants or the accessibility of the complaints process; rather, they ensure the Council meets its regulatory obligations under the Complaint Handling Code.
- 3.3 Furthermore, due to the time-bound nature of the deadline set by the Housing Ombudsman recommendations, tenants and residents were not consulted with to ensure an expeditious review and revision.
- 3.4 Whilst timeframes have not allowed for resident consultation at this time, Council Housing service is committed to sharing these changes with the Council Housing Advisory Group and Tenant Voice, as well as seeking to adopt tenant scrutiny within our work over the coming twelve months.
- 3.5 The amendments to the policy have been reviewed and agreed by key staff members involved with the complaints process.

4.0 Options and Options Analysis (including risk assessment)

	Option 1: Approve revised policy (Preferred)	Option 2: Retain April 2024 policy –	Option 3: Defer approval
Advantages	Ensures full compliance with the Housing Ombudsman Complaint Handling	No identified advantages.	Allows more time for internal review or additional consultation if required.

	Code and meets Ombudsman requirements, thereby reducing the risk of regulatory action and reputational damage. Provides clarity and transparency for residents and staff.		
Disadvantages	None	This option leaves the Council non-compliant with the Ombudsman Code and recommendations as the current policy contains wording and exclusions deemed unfair or unclear.	Misses Ombudsman deadlines for response and implementation. Delays compliance and undermines confidence in governance processes.
Risks	Minimal risk if approved	High risk of Ombudsman enforcement action, including Complaint Handling Failure Orders. Significant reputational damage and potential governance criticism.	High risk of regulatory action and reputational harm. Potential escalation by Ombudsman for failure to act within required timescales

5.0 Officer Preferred Option (and comments)

- 5.1 Option 1 is the officer preferred option. Adopting the new Policy ensures compliance with the Housing Ombudsman.

6.0 Conclusion

- 6.1 Approval of the revised Complaints Policy (December 2025) is essential to ensure the Council meets its statutory obligations under the Housing Ombudsman Complaint Handling Code and complies with the Ombudsman's recommendations following their September 2025 review.
The changes strengthen clarity, fairness, and accessibility for residents while improving governance and accountability.
- 6.2 Timely approval is critical to meet the Ombudsman's compliance deadlines thereby mitigating the risk of enforcement action and reputational harm.

RELATIONSHIP TO POLICY FRAMEWORK

The revised Complaints Policy supports the Council's priorities of delivering a Cooperative, Kind and Responsible Council and Healthy and Happy Communities. It also contributes to compliance with the Housing Ombudsman Complaint Handling Code and aligns with the Council Housing Service Improvement Plan (SIP) 2024–26, ensuring transparency, accountability, and continuous improvement.

CONCLUSION OF IMPACT ASSESSMENT

(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, HR, Sustainability and Rural Proofing)

No impact identified.

LEGAL IMPLICATIONS

There are no legal implications to amending the complaints policy. Like any policy of the Council it is important that officers follow approve policy and only depart from policy where there is a good reason to do so. Failure to follow the complaints policy could result in adverse findings by the Ombudsman, financial penalty and reputational harm.

FINANCIAL IMPLICATIONS

There are no direct financial implications arising from this report.

OTHER RESOURCE IMPLICATIONS

Human Resources:

None

Information Services:

None

Property:

None

Open Spaces:

None

SECTION 151 OFFICER'S COMMENTS

The s151 Officer has been consulted and has no comments to add

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has no further comments to add

BACKGROUND PAPERS

Complaints Policy (December 2025)

Contact Officer: David Holme

Telephone: 01524 582089

E-mail: dholme@lancaster.gov.uk

Ref: n/a

Appendix A: Self-Assessment Form (April 2025)

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaint's performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary, as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	Lancaster City Council Complaints Policy	<p>Lancaster City Council’s complaint handling process uses the Housing Ombudsman (HO) definition of a complaint.</p> <p>“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.”</p>
1.3	<p>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.</p>	Yes	Lancaster City Council Housing Complaints Policy	<p>Where the substance of feedback amounts to a complaint it is recorded as a complaint and investigated as such. This is even if the resident has not expressly stated they wish to make a complaint.</p> <p>This is catered for in the Housing Ombudsman definition of a complaint “A complaint is an expression of dissatisfaction.”</p> <p>Complaints received on behalf of a resident are handled in line with the Housing Complaints Policy providing we are satisfied we have valid authority to act.</p> <p>Some contacts such as MP or Councillor enquire are handled as complaints through the formal</p>

				<p>process if we believe that the constituent's issue is a complaint rather than an enquiry or service request.</p> <p>This is included in our Complaints Policy and also within our service-wide in-house training.</p>
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	Lancaster City Council Complaints Policy	<p>Our complaints policy explains the difference between a service request and a complaint. It states:</p> <p>"If this is the first time you are reporting an issue, it will be treated as a service request unless dissatisfaction is expressed. Examples of service requests include missed bin collections or housing repairs."</p> <p>Service requests are logged on the same system as complaints – but are excluded at the acknowledgement stage.</p>
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	Lancaster City Council Complaints Policy	<p>Based on the definition of a complaint used by Lancaster city Council.</p> <p>Expressions of dissatisfaction about the response to a service request would be included in this process.</p>
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	Yes	Lancaster City Council Complaints Webpage	<p>"Any expression of dissatisfaction regarding our services that is made through a survey, will not be defined as a complaint. Wherever possible, we will contact the person completing the survey to advise how they can pursue a complaint if they wish to."</p>

	feedback about their services, they also must provide details of how residents can complain.			
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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	Lancaster City Council Complaints Policy	<p>As a landlord we do accept, log, investigate and respond to all complaints.</p> <p>Our complaints policy lists the exclusions to this in detail.</p> <p>Complaints handling software (Granicus) allows for the recording and monitoring of excluded complaints.</p>
2.2	<p>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:</p> <ul style="list-style-type: none"> • 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	Lancaster City Council Complaints Policy	<p>Our complaints policy lists the exclusions to this in detail. We also have improved the clarity of our exclusions outlining that:</p> <ul style="list-style-type: none"> • Policy disagreements and rent/service charge complaints are only excluded if no failure in process or application is alleged. • Complaints can be raised until legal proceedings are filed. • Discretion will be applied for complaints outside 12 months

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	Lancaster City Council Complaints Policy	Our complaints policy expressly states: “The council will normally only accept complaints made within twelve months of the incident or circumstances that led to the complaint.”
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	Lancaster City Council Complaints Policy	Our complaints policy expressly states: “If the Council, as your landlord, decides not to accept a complaint, a detailed explanation will 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 Housing Ombudsman.” Complaint exclusion letters are part of a suite of template letters. These letters provide clear information and guidance on the tenants right to contact the Housing Ombudsman and provides the contact details for the organisation
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Lancaster City Council Complaints Webpage	The Council Housing Complaints webpage page expressly states: “Council Housing will always accept a complaint unless there is a valid reason no to do so. However, when assessing whether to treat a contact as a complaint or not. Each case will be considered on its individual merits and

				consideration may be given.”
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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	Lancaster City Council Complaints Webpage Council Housing Reasonable Adjustment Policy	<p>Our customer care page expressly states:</p> <p>“Complaints can be made online, via email, by telephone, in person or in writing. If you prefer to talk to someone in person, a meeting can be arranged and a friend, relative or other representative can come with you if you wish.”</p> <p>Lancaster City Council’s Council Housing service has a comprehensive Reasonable Adjustments policy that outlines the organisation’s commitment to adhere to the Equality Act 2010. In addition to this, our complaints policy, now explicitly states that requests for accessible formats will be considered.</p> <p>This policy is a public facing document that can be easily found on the Council Housing webpage</p>
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	Lancaster City Council Complaints Webpage	<p>Our customer care page expressly states:</p> <p>“Complaints can be made online, via email, by telephone, in person or in writing. If you prefer to talk to someone in person, a meeting can be arranged and a friend, relative or other representative can come with you if you wish.”</p>

				Annual refresher training is provided for all 'front line' staff, to help them recognise and effectively handle expressions of dissatisfaction/complaints.
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	Lancaster City Council Complaints Webpage	Our web page outlines that complaints are useful feedback that allows our service to identify areas for improvement.
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	Lancaster City Council Complaints Webpage Lancaster City Council Complaints Policy	Our policy is easily found on our wider council webpage. It clearly defines the two stage complaints process, what occurs at each of these stages and the timeframes involved. We also have regular social media posts and newsletter articles that direct tenants to our complaints policy.
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	Lancaster City Council Complaints Policy	Our policy explains that it will be published on the council's main website and the Council Housing specific page. It commits to regularly promoting the complaints process through channels like social media and newsletters. The policy also includes information about the Housing Ombudsman Service and the Complaint Handling Code.
3.6	Landlords must give residents the opportunity to have a representative deal with their	Yes	Lancaster City Council Complaints Policy	Lancaster City Council's complaint policy outlines that; a complaint can be made on behalf of the

	complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.			resident by a councillor, advice worker, solicitor or other third party. However, a third-party consent form must be completed.
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	Lancaster City Council Complaints Policy	The Complaints policy provides clear information on how a resident can access the Ombudsman service. This is also included in our complaint response letters at both Stage 1 and Stage 2.

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		<p>Council Housing has a named Complaints Officer with the required responsibility, and a team of additional officers who act as complaint handlers and complaint administrators.</p> <p>These Officers receive clear guidance and appropriate training to carry out this role.</p> <p>The Complaints Officer for council housing has overall responsibility for this area of work, and acts as liaison with the Housing Ombudsman and reports via the organisation's governance structures (Cabinet, Portfolio Holder, additional groups and committees).</p>
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		<p>The 'complaints officer' function is undertaken by the Council Housing Manager who is a senior manager in the housing team who has access to staff of all levels.</p> <p>Due to their seniority within the organisation, they also have the May 2024 authority and autonomy to resolve disputes.</p>
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	Yes	Induction Handbook	All front-line staff have received complaint handling training which is refreshed on a biennial basis.

	seen as a core service and must be resourced to handle complaints effectively			<p>In addition to this Complaints Training is part of the induction process for new starters within the service.</p> <p>Learning is recorded on all complaints as part of the complaint handling system/software. A monthly complaint learning meeting is held between managers.</p> <p>Learning is published on a quarterly basis.</p>
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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	Lancaster City Council Complaints Policy	<p>Lancaster City Council has a single complaints policy. This policy covers all service areas within the organisation.</p> <p>Residents will never be treated differently if they choose to raise a complaint as we view this as an opportunity for learning and development.</p>
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	Lancaster City Council Complaints Policy	Whilst Lancaster City Council promotes a culture that resolves complaints early, we operate a two stage complaints process with no additional named stages as outlined in our complains policy document.
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	Yes	Lancaster City Council Complaints Policy	Lancaster City Council operates a two stage complaints process with no additional named stages as outlined in our complains policy

	delay access to the Ombudsman.			document.
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	Lancaster City Council Complaints Policy	<p>Complaints a third party remains under the scope of our two stage complaints process and residents are not expected to go through two complaints processes.</p> <p>In any circumstances we would not request a third party to complete a response on our behalf, information would be gained from the third party and included in a response letter from a named Lancaster City Council member of staff.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Lancaster City Council Complaints Policy	<p>Any complaint response that is investigated by a third party remains under the scope of our complaints policy and therefore in line with the Ombudsman Code of practice.</p> <p>In any circumstances we would not request a third party to complete a response on our behalf, information would be gained from the third party and included in a response letter from a named Lancaster City Council member of staff.</p>
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	Lancaster City Council Complaints Policy Stage 1 and 2 Acknowledgement Letters	<p>All acknowledgement letters sent out to residents who have raised a complaint, include a full breakdown of the landlords understanding of the complaint, as well as the outcomes/remedies that the resident is seeking.</p> <p>This is also embedded in our complaints policy wording for both stage 1 and stage 2 acknowledgements.</p>

				In any cases where this information is not known, staff are advised to contact the resident for further clarification.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Stage 1 and 2 Acknowledgement Letters	<p>In the event that an aspect of the complaint raised is not part of the landlord's responsibility and therefore will not be investigated, the acknowledgement letter will clarify this as such and signpost the resident to the correct body.</p> <p>This is also embedded in our complaints policy wording for both stage 1 and stage 2 acknowledgements</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind. b. give the resident a fair chance to set out their position. c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Council Code of Conduct	<p>The service meets the requirements of provision 5.8 through the following means:</p> <ul style="list-style-type: none"> a. This is covered in our inhouse complaint training carried out biennially. b. As part of our process staff are encouraged to contact the complainant to ensure that they are able to fairly set out their position. c. The Council's Code of Conduct outlines the expectations around potential

				<p>conflict of interests and the measures taken to avoid or minimise these situations.</p> <p>d. Responding officers are skilled and experienced members of staff. Who have received adequate training and are able to consider relevant information and evidence carefully?</p>
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	Lancaster City Council Complaints Policy	<p>Section 6. timescales outlined that in exceptional circumstances, cases may need additional time to fully investigate and to arrange remedial action.</p> <p>In these cases, any extension beyond code timescales must be agreed with residents, including suitable intervals for updates.</p> <p>Staff are advised to agree suitable timescales with the complainant and ensure they are regularly updated on progress as part of their in-house training.</p>
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	Council Housing Reasonable Adjustment Policy	Council Housing has a comprehensive reasonable adjustments policy that outlines our commitment to ensuring our service is accessible to all

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	Lancaster City Council Complaints Policy	We will never refuse to escalate a complaint without a valid reason to do so. in cases where we would refuse to escalate a complaint to the second stage of our process, we would provide the complainant with a letter that clearly sets out the reasons for refusal in line with Section 2 of the Ombudsman code.
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	Complaint Handling System (Granicus)	<p>Lancaster City Council use Granicus to record all cases. Using this platform a full record of the complaint can be kept, including actions and outcomes.</p> <p>All details of the complaint itself are recorded, including the date received, the complaint definition and outcomes being sought.</p> <p>It also allows the service to record the correspondence with the tenants such as letters, emails etc.</p> <p>As this is a new IT system a record is kept on a tracker to ensure excellent record keeping during this transitional period.</p>
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	Lancaster City Council Complaints Policy	<p>Our policy outlines that we will put things right when they have gone wrong, that we will inform complainants of the actions it will take or intends to take to put things right.</p> <p>This is not a stage dependent aspect of the process and appropriate remedies will be taken at either stage of the complaint.</p>
5.14	Landlords must have policies and procedures in	Yes	Lancaster City Council	Covered in Section 10 of the Complaints Policy

	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.		Complaints Policy Council Housing – Unacceptable Behaviour Policy	Document. Council housing also has an Unacceptable Behaviour 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	Lancaster City Council Complaints Policy Council Housing – Unacceptable Behaviour Policy	Section 10 of our Complaints Policy states that while the council welcomes feedback, it will not tolerate abusive, threatening, or deceitful behaviour and will take proportionate action if it occurs. Council Housing also has an Unacceptable Behaviour Policy, which outlines actions—such as limiting contact—that may be taken in response to verbal abuse, threats, or similar behaviour, always ensuring the response is proportionate.

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	Lancaster City Council – Guidance on Complaints.	<p>Our complaints process aims to resolve issues as early as possible, considering the case's complexity and any urgent matters.</p> <p>We hold weekly complaints huddles to review cases, identify quick resolutions, and decide which need further investigation. Staff are encouraged to act promptly, even before a formal response is given.</p> <p>Complaint handlers should contact complainants early to assess complexity or vulnerability and clarify any issues. Complex cases are referred to the complaints manager to assign the appropriate investigator across teams.</p>
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	Lancaster City Council - Complaints Policy	<p>Section 6 outlines that the investigating officer must contact the complainant to fully understand the issues.</p> <p>It also states that Stage 1 complaints should be acknowledged and logged within 5 working days of receipt.</p>

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Lancaster City Council - Complaints Policy	Section 6 of Lancaster City Council's complaints policy states that a full Stage 1 response must be issued within 10 working days of the acknowledgement of the complaint.
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	Lancaster City Council - Complaints Policy Stage 1 Extension Letter (10 days) Template	Lancaster City Council's complaints policy states that if a response delay is needed, the officer must inform the complainant of the new timescale, explain the reason, and provide ombudsman contact details. Extensions are at the council's discretion but should not exceed 10 working days without good reason. A Stage 1 Extension Letter Template is available to support this process.
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	Stage 1 Extension Letter (10 days) Template	If a complaint requires an extension, the responding officer will provide the complainant with Housing Ombudsman contact details. All response letters include information on how residents can contact the Ombudsman, and a Stage 1 extension letter template includes these details as well.
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	Lancaster City Council – Guidance on Complaints.	The complaint response is sent once the outcome is known. Any outstanding actions are listed in the response with target or agreed dates and are recorded on the Granicus system.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons	Yes	Lancaster City Council – Guidance on Complaints.	Lancaster City Council has adopted the Housing Ombudsman's best practice letter template for

	for any decisions, referencing the relevant policy, law, and good practice where appropriate.			all complaint responses. This ensures all issues raised are addressed, with clear explanations for the decisions made and any actions taken.
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	Lancaster City Council Complaints Policy	Our policy states that states where additional concerns raised are related to the original complaint and would not cause an unreasonable delay to the complaint investigation and response - they will be incorporated into the ongoing investigation and addressed within the same response.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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	Response Letter Template.	Lancaster City Council uses a letter template for all responses. In this template all items A) to G) are included.

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	Yes	Response Letter Template	Stage 1 complaint letters inform residents that if they are dissatisfied with the response, they

	progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.			should contact the organisation to have the complaint reviewed at Stage 2.
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Lancaster City Council - Complaints Policy	Section 6 states that Stage 2 requests must be acknowledged and logged within five working days of receiving the escalation request.
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	Lancaster City Council - Complaints Policy	Residents are not required to provide reasons for escalation to Stage 2 as outlined in our complaints policy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Lancaster City Council – Complaints Policy	<p>The Council's complaint policy outlines that: "a Chief Officer (or their delegated senior officer) should undertake the review.</p> <p>This should not be the same person who investigated the Stage 1 complaint and should not be the subject of the complaint."</p> <p>In the event the complaint is about a Chief Officer it will be reviewed by the Senior Leadership Team.</p>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Lancaster City Council Complaints Policy	The standards for stage 2 complaints are detailed within the complaints policy. The standard for responding to a stage 2 complaint is 20 working days.
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	Yes	<p>Lancaster City Council Complaints Policy</p> <p>Stage 2 Extension Letter (20 days) Template</p>	Lancaster City Council's complaint policy outlines all guidance on extensions at stage two. It highlights that although extensions are at the discretion of the landlord, they cannot exceed 20 working days without good reason including Extensions beyond 20 days must be agreed with

	reason(s) must be clearly explained to the resident.			residents and include update intervals. The service also has an extension letter for Stage 2 complaints. Which meets the requirements of this provision.
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	Extension Letter Templates	All letters sent to residents as part of our complaint handling procedure include details on how to contact the Housing Ombudsman, including correspondence regarding timescale extensions. The service also has an extension letter for Stage 2 complaints that meets these requirements.
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	Lancaster City Council Complaints Policy	The complaint response is sent to the resident when the answer to complaint is known. If there should be any outstanding actions, these will be listed within the written response with target/arranged dates. Outstanding actions are tracked within the system until they are completed.
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	Lancaster City Council Complaints Policy	Lancaster City Council has adopted the Ombudsman's best practice letter template for all complaint responses. Because of this our complaints responses do address all points raised and provide clear reasons for the decisions made.
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.	Yes	Response Letter Template	As with the responses for Stage 1 complaints. Lancaster City Council uses a letter template for all responses at stage 2. In this template all items A) to G) are included.

	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.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Response Letter Template	Lancaster City Council operates a two stage complaints process, as such any stage 2 response sent to a resident is the final response

Section 7: Putting things right.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Yes	Lancaster City Council Complaints Policy	Our complaints procedure is designed to resolve disputes effectively by identifying issues and outlining the actions required to address them. The response letters offer officers the opportunity to detail how the council plans to resolve the complaint, including all options specified in code requirement 7.1.

	<ul style="list-style-type: none"> Changing policies, procedures, or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Lancaster City Council Complaints Policy	Lancaster City Council always try to ensure the remedies offered reflect the impact on the resident. We also, wherever possible, try to ascertain what outcome the resident is seeking as part of the complaints process.
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	Response Letter Templates	<p>Response letters sent to the resident will always clearly set out what actions will be taken as part of the remedy, wherever known this will include the timescales of said actions and the officer who will be carrying these out.</p> <p>In cases where appropriate outstanding actions, appointments, repairs will be made in agreement with the resident. All remedies will be processed through to completion and note of these can be recorded on the councils' complaints tracker (Granicus).</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		<p>We are committed to handling complaints in the best possible manner.</p> <p>We refer to the Ombudsman's guidance when deciding upon remedies for our complaint cases.</p> <p>In instances where the ombudsman contacts Council Housing directly to issue guidance on particular cases, we will always take account of the guidance offered to us.</p>

				A compensation policy was developed and published in the 2024-25 financial year.
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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	Annual Complaints Report 2024-25	Lancaster City Council's Council Housing Team have produced an annual complaints performance and service improvement report for scrutiny. The report includes this annual self-assessment as an addendum ensuring that the complaints policy remains in line with its requirements. Both qualitative and quantitative analysis of our performance is included, including the types and nature of complaints received. It also includes learning from the previous year's complaints and service improvements to be focused upon in the coming 12 months. The report includes findings of non-compliance and investigations carried out by the Housing Ombudsman as well as the most recent Landlord Performance report from the Ombudsman (Last updated July 2024).
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and	Yes	Lancaster City Council Complaints Webpage	Report scheduled on 4th June 2024 Cabinet. Documents relating to this and the Council's response will be published on our complaints

	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.			section of our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Although Lancaster City Council is not currently undertaking any mergers, restructures, or changes in procedures. We are committed to doing to in the event of such.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Lancaster City Council's Council Housing Service is committed to carrying out a review and update of our self-assessment should we be requested to do so by the Ombudsman.
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 website Landlords must provide a timescale for returning to compliance with the Code.	Yes		Should such an incident/situation occur and as a landlord we were unable to comply with the Code. Council Housing would be committed to informing the Ombudsman and the affected complainants and publish this on our website with the appropriate timescales for the resuming of the service.

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	Lancaster City Council - Guidance on Complaints	<p>Lancaster City Council is committed to learning from residents' complaints and looking beyond the circumstances of the individual complaint.</p> <p>We hold regular review of the complaints we have received to identify service failures and use this learning to consider whether service improvements need to be made as a result.</p>
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	Lancaster City Council - Guidance on Complaints	<p>Lancaster City Council's Council Housing Service acknowledges the positive impact of complaints on improving future service delivery, supported by the investigation and learning process.</p> <p>Our regular learning sessions use complaints as valuable intelligence to identify broader service issues and implement necessary improvements in service delivery.</p>
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	Quarterly Learning and Service Improvement Report.	<p>Staff and residents will receive a quarterly learning and improvement report that outlines the wider learning and related service improvements.</p> <p>The Council Housing Advisory Group (Councillors, Tenants, Community Partners) will also receive this report as part of a quarterly meeting.</p>

				<p>The Cabinet (as part of the council governance) will receive this learning and service improvement report on a quarterly basis also.</p> <p>This reporting process will commence in Q1 of the 2025-26 fiscal year</p>
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		<p>The Council Housing Manager has accountability for complaints handling.</p> <p>In conjunction with the Policy and Performance Officer this role also assesses any themes or trends to identify potential system issues.</p>
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		An elected member of the Cabinet has been appointed to have overall responsibility for complaints for the organisation.
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		The MRC receives regular updates of the landlord's performance in relation to complaints. It is the MRCs responsibility to convey this information to the wider elected council. The Lead Member sits on the Council Housing Advisory Group
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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	<p>Quarterly Complaints Reports</p> <p>Complaint Cabinet Reports</p> <p>Annual Complaint Performance and Service Improvement Report</p>	Lancaster City Council's Council Housings Complaints Report 2023-24 will incorporate all the required elements of Provision 9.7 and will be published both on the Committee pages of the Council's website and on the Complaints pages.

	<p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			This self-assessment will be updated to reflect this measure on publication of the Annual Complaints Report.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any Yes relevant professional body.</p>	Yes	Service Improvement Plan TSM Action Plan	<p>Our organisation works collaboratively with other services.</p> <p>One of our core values is 'being accountable,' as so we take responsibility for failures as a collective, rather than promoting a blame culture. We are committed to acting within the professional standards for engaging with complaints as set out by the Ombudsman.</p>

Complaints Policy

December 2025

Prepared by:	DH
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Approved by:	JW
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Policy Aim

This policy's aim is to acknowledge the importance and value of complaints in improving our services.

To ensure that feedback is handled in a manner that supports the council's approach to providing user focused services and with any other relevant legal and policy requirements.

To provide a clear route by which customers can give feedback about the service they have received from the council.

To ensure feedback is dealt with fairly, promptly and sensitively.

To promote a culture of continuous learning and using feedback to continuously improve our services.

To ensure a consistent, effective and timely approach to complaints handling.

Introduction

Lancaster City Council welcomes all feedback from customers on how our services can be improved. Whilst this policy focuses on complaints, it is recognised that staff frequently receive compliments and letters of appreciation. These positive comments are highly valued by the council as evidence of its commitment to providing excellent services.

On some occasions, however, customers may not be satisfied with a decision made by the council, the provision of a service or an action taken on an individual case. This document sets out the corporate complaints policy.

The provisions of this policy applies across the council, and all relevant feedback will be dealt with in accordance with it.

This policy will be openly publicised on the council's website or by request from Customer Services.

Lancaster City Council will deal with complaints fairly, thoroughly and sensitively and aim to address any problems raised at the earliest stage possible. Staff will be empowered to try and solve any difficulties reported by customers without recourse to the formal procedure.

1. What is a complaint?

We adhere to the Local Government Ombudsman and Housing Ombudsman definition of a complaint. Therefore we consider a complaint to be:

“An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals.”

Therefore a tenant or resident does not have to use the word ‘complaint’ for it to be treated as such

Service Requests

The council recognises that there is a difference between a service request and a complaint.

A service request is a request from a customer to the council requiring action to be taken to put something right.

An example of this could be; raising a housing repair for a Lancaster City Council Tenant, or to collect a Bin that had been missed during a collection.

Service requests are not complaints, but they will be recorded, monitored and reviewed regularly.

If this is the first time you are reporting an issue to us, we may decide to treat this as a request for service, unless dissatisfaction is expressed. Once recorded, incoming feedback is reviewed by our Customer Service team, who ensures the matter is recorded correctly.

A complaint is raised when a customer expresses dissatisfaction with the response to the service they have already received or their service request, even if handling the service request remains ongoing. The council will not stop its efforts to address the service request if the customer complains.

Exclusions

Complaints will be accepted unless there is a valid reason not to do so. Below is a list of the reason why a complaint may not be investigated.

- Day to day service requests or the initial reporting of faults, where no clear complaint has been made.
- Disagreements with the Council's policies where the complaint is not based on an alleged failure to follow due process or a misapplication of that policy.
- Complaints only about the amount of Rent, Service Charges, or Fees (or the size of an increase), where there is no claim of an error in the way the charge was set or calculated.
- Complaints against individual employees which arise from dissatisfaction with a council policy or decision, and where no other basis for the complaint exists.
- Appeals against any council advice, actions, or decisions in its capacity as a regulator where a statutory right of appeal or other council appeals/review procedure exists.
- Appeals concerning a matter where an alternative appeal/review procedure exists, such as an appeal within the council or to an independent tribunal (e.g., the awarding of Housing Benefits).
- Matters that have previously been investigated and responded to under the complaints policy. and has exhausted the complaints process with no new information or evidence being provided.
- A matter which is, or could be reasonably be expected to be, the subject of Court or tribunal proceedings. Challenge of a Council or Committee decision would generally be by way of Judicial Review.
 - Please note that complaints can be raised up until the point legal proceedings have been filed.
- Complaints that are in the hands of the council's insurers where no other basis beyond compensation can be found.
- Complaints which constitute a refusal to accept a rule of law which the council is applying.
- Complaints about the conduct of councillors. These should be submitted in writing to the Monitoring Officer.

Complaints will be accepted if referred within 12 months of the issue occurring or the resident becoming aware of it, unless excluded on other grounds

If the Council decides not to accept a complaint, then a detailed explanation will be provided setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.

Data Protection-Related Complaints

Data Protection related complaints will be dealt with in consultation with the council's Information Governance Officer considering the council's statutory obligations and information security policies.

Statutory Power

It is recognised that the Local Government Social Care Ombudsman (LGSCO) and the Housing Ombudsman (HO) have different statutory powers.

The LGSCO code is voluntary and will not be enforced however the HSO has the power to issue codes of practice and guidance as well as the power to investigate and take enforcement action against non-compliant providers.

Complaints about discrimination

In the case of complaints about discrimination concerning the protected characteristics under the Equality Act 2010 (i.e., race, religion, or belief, disability, sexual orientation and gender identity) the council will take into account its obligations under the Act and related corporate policies and objectives on equality.

2. When can a complaint be made?

2.1. With complaints it is far easier to find out what happened and put things right if they are received soon after they occur.

As time passes it becomes harder for us to investigate events fairly and fully – people's memories fade, staff who were involved leave the council, or records may no longer be available.

For these reasons, the council will accept complaints made within twelve months of the resident being made aware of the issue or the issue occurring.

The council will however, apply discretion to accept complaints made outside of this time limit.

3. Who can make a complaint?

- 3.1. Any individual or organisation that uses or receives a council service can make a complaint.
- 3.2. A complaint can be made on behalf of the service user by a councillor, advice worker, solicitor or other third party. In some cases (e.g., where the complaint comes from a private individual, whether a relative of the complainant or not) evidence will be needed that the complainant both knows of and consents to the complaint being made and is happy for information on this matter to be shared with the third party. A third party consent form should be signed and returned to the council prior to commencing any investigation.
- 3.3. Elected members are encouraged to use the complaints procedure on behalf of their constituents, as the monitoring and feedback provided is valuable to Services. Complaints raised by elected members are subject to the same requirements for consent.
- 3.4. Complaints received anonymously will be considered by the Service concerned, any investigation being proportionate to the potential outcome

4. How can a complaint be made?

- 4.1. Complaints can be made in person, over the telephone, in writing, by email and digitally
- 4.2. When an issue is recorded at Stage 1 of the complaints process the scope of the complaint will be agreed with the complainant and a record of this will be taken by the complaint handler.
- 4.3. The council is committed to working within the Equality Framework for Local Government and will make facilities available to assist customers in making a complaint including translation facilities, home visits and information being made available in other formats as necessary. The council will also consider any requests to make the complaints policy available in an accessible format.

5. Overview of the complaints procedure

The council operates a two-stage system for handling complaints. Stage One handles the initial complaint and its response from the council. Whereas Stage Two is for escalating complaints should you feel unhappy with the initial Stage One response.

Stage 1 Complaints

- 5.1. A senior officer within the Service subject to the complaint should deal with the complaint and inform the complainant in writing of their findings and decision. For appeals against the council in its capacity as a regulator the officer will not have been involved in the decision or action against which the appeal is being made.
- 5.2. The complainant will be advised of any further steps which they may take if they are not satisfied with the decision. The council will normally only review complaints if the complainant responds to the decision letter within 28 days requesting further escalation of their complaint.
- 5.3. If the complainant request their complaint be escalated, it will then be dealt with at Stage 2 of the formal complaints process.
- 5.4. A full list of standards and timescales is included in section 6.

Stage 2 Complaints

- 5.5. Residents are not required to provide reasons for escalation to Stage 2

The review should be undertaken by a Chief Officer (or their delegated senior officer). This should not be the same person who investigated the Stage 1 complaint, and should not be the subject of the complaint. They will review the adequacy of the stage 1 response, as well as any new and relevant information not previously considered.

In some circumstances, where appropriate, the Chief Officer for the Service subject to the complaint, may undertake a Stage 2 complaint review, however, this is will be reviewed and agreed upon by the Senior Leadership Team. Please be aware that Stage 2 is not a more thorough, detailed investigation of the complaint

- 5.6. Complainants will be advised of any further steps which they may take if they are not satisfied with the outcome of the review of their complaint. In that they may refer their complaint to an appropriate statutory or local body. This is usually the Local Government Ombudsman or Housing Ombudsman (dependent on the service the complaint is about).

6. Standards for responding to complaints

Stage 1 Complaints

- 6.1. The officer assigned to investigate and address the complaint must establish contact with the complainant to ensure a comprehensive understanding of the issue/s.
- 6.2. Complaints should be acknowledged, defined and logged at Stage 1 of the complaints procedure within 5 working days of the complaint being received.
- 6.3. Acknowledgements of Stage 1 complaints will include an account of the landlords understanding of the complaint, and which areas we are responsible for, along with the outcomes a resident is seeking. If any aspect of the complaint is unclear we will contact the tenant for clarification.
- 6.4. The Officer responding to the complaint must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged. The complaint response should be provided to the resident when the outcome and actions required are known, not when outstanding actions are completed.
- 6.5. If an extension to the response timescale is required, the Officer handling the complaint will inform the complainant as soon as possible. This communication will include:
 - The revised expected timescale for the response;
 - A clear explanation of the reason for the delay; and
 - Contact details for the relevant ombudsman service.

Any extension will not exceed 10 working days unless there is a strong and justifiable reason to do so. Any extension beyond this timescale must be agreed along with suitable intervals to keep the resident updated.

Stage 2 Complaints

- 6.6 Requests for escalation to Stage 2 should be acknowledged, defined and logged at Stage 2 of the complaints procedure within five working days of the escalation request being received.
- 6.6. Acknowledgements of Stage 2 complaints will include an account of the landlords understanding of the complaint, which areas we are responsible for, along with the outcomes the resident is seeking. If any aspect of the complaint is unclear we will contact the tenant for clarification.

- 6.7. The council must issue a final response to the Stage 2 review within 20 working days of the complaint being acknowledged. The complaint response should be provided to the resident when the outcome and actions required are known, not when outstanding actions are completed.
- 6.8. If an extension to the response timescale is required, the Officer handling the complaint will inform the complainant as soon as possible. This communication will include:
- The revised expected timescale for the response;
 - A clear explanation of the reason for the delay; and
 - Contact details for the relevant ombudsman service.

Extensions will not exceed 20 working days unless there is a strong and justifiable reason to do so. Any extension beyond this timescale must be agreed along with suitable intervals to keep the resident updated.

7. Raising Additional Complaints

- 7.1. If a complainant raises additional concerns while their original complaint is still under investigation, Lancaster City Council will assess how best to manage the new issues in a fair and timely manner.
- **Related Issues:** If the additional concerns are related to the original complaint and the Stage 1 response has not yet been issued, they will be incorporated into the ongoing investigation and addressed within the same response.
 - **Unrelated or Late Issues:** If the Stage 1 response has already been issued, or if the new concerns are unrelated to the original complaint, the new issues will be logged and handled as a separate complaint.
 - **Avoiding Unreasonable Delay:** Where including additional issues would cause an unreasonable delay to the original complaint response, the new issues will be logged separately to ensure timely resolution of both matters.

8. Complaints Involving Multiple Services

- 8.1. Where a complaint covers more than one service a single council reply should be provided, and this should be co-ordinated by the Service which is the subject of the majority of the complaint

9. Complaints Involving Third Parties

- 9.1. Where there is a complaint about a service which the council is responsible for, but which is delivered by a third party, the council remains accountable for any service failure.
- 9.2. An agreement should be made with a partner or contractor about how complaints are handled. This should incorporate adherence to this Complaints Policy.
- 9.3. Subject to the arrangements in paragraph 8.2 above, a contractor may investigate a complaint.

10. Putting Things Right

- 10.1. Where there is a complaint about a service which the council is responsible for, but which is When something has gone wrong, the council will acknowledge this, and it will inform complainants of the actions it has already taken or intends to take, to put things right. by a third party, the council remains accountable for any service failure.
- 10.2. This 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; through compensation
 - Reviewing policies, procedures or practices, making changes where required.

11. Abusive or Persistent Complainants

- 11.1. The council aims to treat all complainants fairly and will, as far as possible, ensure that the substance of any complaint is addressed. However, the council also has a duty to effectively manage public funds by ensuring resources expended on handling complaints are proportionate.

11.2. Where the council considers a complainant unreasonably persistent, it will take action to restrict their access to the council's complaints procedure. Examples of unreasonable actions and behaviours include:

- Refusing to co-operate with the complaints investigation process;
- refusing to accept that certain issues are not within the scope of the complaints procedure;
- making unjustified complaints about staff who are trying to deal with the issue, and seeking to have them replaced;
- changing the basis of the complaint as the investigation proceeds;
- introducing trivial or irrelevant information at a later stage; frequent, lengthy contacts and repetitive information;
- submitting repeat complaints with minor additions/variation; and
- refusing to accept the decision; repeatedly arguing points with no new evidence.

11.3. The council will notify complainants deemed unreasonably persistent of the action it proposes, which may include terminating contact with them.

11.4. The council welcomes comments but will not tolerate deceitful, abusive, offensive, threatening or other forms of unacceptable behaviour from complainants and will take appropriate and proportionate action should such circumstances arise.

12. Replies to Complainants

12.1. Complaints should be seen as an opportunity to resolve the customer's problem and to learn from feedback and should be responded to in that way.

12.2. A reply to a complaint should contain:

- A summary of the complaint and the stage this is at.
- Steps taken to investigate the complaint.
- The findings, decision and reasons for it
- Reference to whether the council upholds, or does not uphold the complaint
- An apology where appropriate
- Information on any action that is going to be taken to resolve the problem
- Details of any learning and service improvements identified as a result of the complaint
- Details of further stages of the complaints process and contact details for the relevant ombudsman if the complainant remains dissatisfied.

12.3. Where follow up action is promised the person responding to the complaint should ensure that this is carried through, with actions being recorded.

13. Quality Assurance

- 13.1. Our quality assurance document serves as a comprehensive framework that guides our assessment of complaints. Complaints will be sampled at random. This approach allows us to identify good practice, key learning points, implement corrective measures, and improve services.
- 13.2. This will be led by the Chief Officer responsible for Customer Services, and reports will be made available to the Senior Leadership Team and Member responsible for complaints.

14. Keeping Records

- 14.1. Records should be retained for all formal complaints on the councils complaint system 'Granicus'.
- 14.2. Detailed information on individual complaints should be treated confidentially with access limited to those involved in resolving the matter
- 14.3. Records on individual complaints should be stored on the councils complaint system 'Granicus' for 3 years from the end of their administrative use.
- 14.4. Mechanisms should be put in place for ensuring that any suggestions for service improvements arising from complaint investigations are considered and followed through as appropriate.
- 14.5. The arrangements for reporting complaints data should assist the council in managing its overall performance.

15. Publication

- 15.1. This policy will be available on the council's main website and the Council Housing specific page
- 15.2. The council will regularly promote the policy and the complaints process through available media channels (social media, newsletters etc.)
- 15.3. This policy will be formally reviewed every two years, or sooner if required due to legislative changes, significant operational developments, or relevant external recommendations."

16. The Ombudsman Services

The Local Government & Social Care Ombudsman

The Code is issued under the Local Government and Social Care Ombudsman's powers to provide "guidance about good administrative practice" to organisations under section 23(12A) of the Local Government Act 1974.

The Local Government and Social Care Ombudsman may consider failure to comply with the Code as maladministration or service failure.

The Local Government and Social Care Ombudsman considers that the Code applies to all local authorities in England, as well as other specified bodies.

The Code does not replace any statutory complaint processes such as The Children Act 1989 Representations Procedure (England) Regulations 2006 or Local Authority Social Services and National Health Service Complaints (England) Regulations 2009.

Local Government and Social Care Ombudsman
PO Box 4771
Coventry
CV4 0EH

Tel: 0300 061 0614
website: <http://www.lgo.org.uk>

The Housing Ombudsman

The Code is statutory under the Housing Ombudsman's powers in the Housing Act 1996, as amended by the Social Housing (Regulation) Act 2023. 14 Lancaster City Council Complaints Policy By issuing a statutory Code, landlords have a duty to comply with it and the Housing Ombudsman has a duty to monitor compliance against it. This will be delivered through individual investigation findings, submissions of the Code self-assessment and monitoring relevant data, including complaint handling performance.

Under paragraphs 13-15 of the Housing Ombudsman Scheme, the Housing Ombudsman has the power to issue, and publish, Complaint Handling Failure Orders (CHFOs) for failing to comply with the Code.

The Code applies to all member landlords of the Housing Ombudsman Scheme.

Housing Ombudsman Service
PO Box 1484
Preston
PR2 0ET

Tel: 0300 111 3000
E-mail: info@housing-ombudsman.org.uk
Website: www.housing-ombudsman.org.uk

Data Protection

Where you are dissatisfied with the way that any Data Protection issue has been dealt with under this policy you can refer the matter to the Information Commissioner.

Contact details for the Information Commissioner's Officer are as follows:

Information Commissioner's Office
Casework and Advice Division
Wycliffe House
Water Street
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113
Email: enquiries@ico.gsi.gov.uk
Website: <http://www.ico.gov.uk>