

30 July 2025

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SENT VIA EMAIL ONLY

FAO Andy Donald CEO
Haringey London Borough Council
River Park House
5th Floor, 225 High Road
London
N22 8HQ

Dear Andy Donald

Re: Findings from our review of the landlord's complaint policy

Thank you for providing the annual Complaint Handling Code compliance submission form on 27 June 2024.

We have now had an opportunity to review the landlord's complaint policy. Our review is focussed on ensuring landlords have met the requirements of the Code based on what residents can reasonably expect to be included in a policy document. You will see, therefore, that our comments and recommendations do not cover all provisions.

By taking this approach, we aim to work with landlords to achieve consistency across the sector and ensure that residents receive a fair service, regardless of where they live and who provides housing services.

We would encourage the landlord to review our published guidance and tools available on our Centre for Learning. This includes key information about the Code and how it can be applied, and also how senior leaders (including the Member Responsible for Complaints) can use the self-assessment to scrutinise the service effectively.

Our review has identified 22 recommendations, as outlined in Appendix 1.

In terms of next steps, we encourage all landlords to carefully consider any recommended changes to policy and to take time to ensure that any changes are embedded across the organisation.

We will review the landlord's response to our recommendations through next year's annual submissions process. In the case of Haringey London Borough Council, we

would expect the submission to be provided within 6 months of the financial year-end, and no later than 30 September 2025.

It is also important to highlight that although our review has focussed on the landlord's complaint handling policy, the wider provisions of the Code still apply. It is vital that the landlord does not lose focus on both handling complaints effectively in practice and using learning from these as a valuable tool to drive change and improvement, where needed.

In addition to complaint handling, we publish a range of reports to share insights from the complaints we investigate to help landlords drive change in their service provision. These include:

- our spotlight reports that focus on areas of landlord service provision where we see reoccurring failure through our casework,
- severe maladministration and insight reports that focus on case studies and key learning points.
- special investigation and wider order reports which share learning from investigations relating to specific landlords or complaints.

I hope that you find this review helpful and that our comments support the landlord to make positive changes to its complaint handling service. We are committed to using our monitoring activities to provide support where needed, whilst still holding landlords accountable.

Yours sincerely

Paul Mallon
Duty to Monitor Officer
Duty to Monitor Team

Appendix 1

Code Provision	Code Requirement	Commentary / Observations	Recommendation
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>	<p>The landlord refers to its policy as evidence in its self assessment.</p> <p>The landlord does not set out in its policy, that a resident does not have to use the word 'complaint' for it to be treated as such.</p> <p>It is noted from the landlord's self-assessment that it treats "any indication of dissatisfaction as a complaint", however this is not included in its policy.</p> <p>The landlord indicates in section 8 of its policy that a complaint submitted via a third party or representative is handled in line with the same.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that a resident does not have to use the word 'complaint' for it to be treated as such.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that any residents/individuals that express dissatisfaction will be given a choice to make a complaint.</p>
1.5	<p>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.</p>	<p>The landlord refers to 'work instructions' as evidence in its self-assessment and further explains that its system enables for service requests to be escalated to a complaint, so they are able to link the two.</p> <p>The landlord in its policy does not indicate that that it will raise a complaint if the resident expresses dissatisfaction with the response to their service request.</p> <p>The landlord does not indicate in its policy, that a complaint will not prevent/stall or impact on actions needed to resolve any immediate issues (i.e. the service request)</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that it will raise a complaint if the resident expresses dissatisfaction with the response to their service request.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that a complaint will not prevent/stall or impact on actions needed to resolve any immediate issues (i.e. the service request)</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. 	<p>The landlord refers to its policy as evidence in its self assessment.</p> <p>The landlord sets out in section 7 of its policy its list of exclusions. However, it refers to "complaints raised about a Council Service through elected members" as an exclusion and that these are dealt with as "member enquiries". In the context of Housing complaints, this would not be considered a valid exclusion as an MP or Cllr should be able to act as a representative for a resident and to make a complaint on their behalf.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to ensure that any exclusions listed are fair and reasonable.</p>
5.6 5.7	<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.</p> <p>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.</p>	<p>The landlord refers to 'templates', 'work instructions' and 'respond manual' as evidence on its self assessment. It further explains that these have been updated to reflect the requirements of the provision.</p> <p>The landlord in its policy does set out that it acknowledges complaints at stage 1 and at stage 2. However, it does not include that at acknowledgement, it will set out its understanding of the complaint, the outcomes the resident is seeking and which aspects they are and are not responsible for.</p> <p>The landlord does not set out in its policy that if any aspect of the complaint is unclear, the landlord will ask the resident for clarification.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that in the landlord's acknowledgement of any stage 1 complaints or escalations to stage, that it will set out:</p> <ul style="list-style-type: none"> -Its understanding of the complaint -The outcomes the resident is seeking -Which aspects they are and are not responsible for. <p>Recommendation for Haringey London Borough Council to review and update its policy to include that if any aspect of the complaint is unclear, the landlord will ask the resident for clarification.</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.	<p>The landlord refers to its policy, feedback forum, template and work instructions as evidence in its self-assessment.</p> <p>The landlord in section 9 of its policy explains that "if more time is needed for the investigation, we will let you know and give you a new response date." However, the landlord does not detail the extension timescales set out in the Code and therefore does not include when its response falls outside of the extension timescales.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy include the extension timescale of 10 working days as set out in the code.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that the landlord will agree with the resident suitable intervals for being updated on their complaint, when their response falls outside of the extended timescales set out in the Code.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	<p>The landlord refers to its policy and CLT Quarterly Reports as evidence in its self-assessment.</p> <p>The landlord in 9.2 of its policy sets out that upon receiving a complaint, it will acknowledge it within 5 working days and provide a reference number. However, it does not set out that it will be defined.</p>	Recommendation for Haringey London Borough Council to review and update its policy to include that Stage 1 complaints will be acknowledged, defined and logged within 5 working days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	<p>The landlord refers to its policy and CLT Quarterly Reports as evidence in its self-assessment.</p> <p>The landlord in 9.2 of its policy sets that that it aims "to resolve complaints within 10 working days of acknowledgement". However, it does not set out that it will issue a full response to a Stage 1 complaint within 10 working days of the complaint being acknowledged.</p>	Recommendation for Haringey London Borough Council to review and update its policy to include that it will issue a full response to a Stage 1 complaint within 10 working days of the complaint being acknowledged.

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.	<p>The landlord refers to its policy and Feedback Forum as evidence in its self-assessment.</p> <p>Please see commentary/observations against Code provision 5.9</p> <p>The landlord sets out in 9.2 of its policy that if needs more time for the investigation, it will let the complainant know and provide them with a new response date. However, it does not set out that it will explain the rationale for its decision to extend.</p>	<p>Please see recommendations against Code provision 5.9 which further addresses compliance with this provision.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that it will contact the resident following any Stage 1 complaint extension and explain the rationale for their decision and the expected timescale for response.</p>
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.	<p>The landlord refers to 'Ombudsman Complaint Handling Codes (Briefing) and 'Feedback Forum' as evidence in its self-assessment</p> <p>The landlord does not indicate in its policy that a complaint response will be provided to the resident when the answer is known, not when all outstanding actions are completed.</p> <p>The landlord does not indicate in its policy that updates will be provided to the resident on outstanding actions.</p> <p>The above has not been applied in respect of Stage 1 and Stage 2 of the landlord's procedure.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that a complaint response will be provided to the resident when the answer is known, not when all outstanding actions are completed.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that updates will be provided to the resident on outstanding actions.</p> <p>N.B. Further to the above, Haringey London Borough Council may also consider making specific reference to Stage 1 responses or a statement covering both Stage 1 and Stage 2 responses.</p>

6.8	<p>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.</p>	<p>The landlord refers to 'work instructions' as evidence in its self-assessment.</p> <p>The landlord does not set out in its policy that any related additional complaints will be incorporated into the stage 1 response if it has not already been issued.</p> <p>The landlord does not set out in its policy that any new issues will be logged as a new complaint if the stage 1 response has been issued, the issues are unrelated or if it would unreasonably delay the response.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that any related additional complaints received, will be incorporated into the stage 1 response if it has not already been issued.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that any new issues will be logged as new complaint if the Stage 1 response has been issued, the issues are unrelated or if it would unreasonably delay the response.</p>
6.10	<p>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.</p>	<p>The landlord refers to its policy as evidence in its self-assessment.</p> <p>The landlord does not indicate in its policy that a complaint will progress directly from Stage 1 to Stage 2, if all or part of the complaint is not resolved to the residents satisfaction.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that a complaint will progress directly from Stage 1 to Stage 2, if all or part of the complaint is not resolved to the residents satisfaction.</p>

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.	<p>The landlord refers to its policy and 'work instructions' as evidence in its self-assessment.</p> <p>The landlord in its policy sets out that "the team will acknowledge the request within 5 working days". However, it has not included that Stage 2 complaints will be defined and logged within 5 working days of the escalation request being received.</p>	Recommendation for the landlord to review and update its policy to include that Stage 2 complaints will be acknowledged, defined and logged within 5 working days of the escalation request being received.
6.12	Residents must not be required to explain their reasons for requesting stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	<p>The landlord refers to 'work instructions' as evidence in its self-assessment.</p> <p>The landlord sets out in 9.3 of its policy that a Stage 2 request should "specify the reasons for dissatisfaction and the desired outcomes". As per the requirements of the Code provision, residents must not be required to explain their reasons for requesting a stage 2 consideration.</p>	Recommendation for Haringey London Borough Council to review and update its policy to include that residents will not be required to provide reasons for requesting their complaint to be escalated to Stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	<p>The landlord refers to 'work instructions' and its website as evidence in its self-assessment.</p> <p>The landlord sets out in its self-assessment that "S2 investigations are completed by an impartial central team and signed off by the relevant Assistant Director". However, the landlord's policy is unclear at Stage 2 that complaints will be considered by someone that was not involved in the complaint at Stage 2.</p> <p>The landlord refers to a 'Senior Feedback & Resolutions Officer' in outlining extensions at Stage 2 but again it is unclear if they oversee the investigation at this stage.</p>	Recommendation for Haringey London Borough Council to review and update its policy to include that Stage 2 complaints will be considered by someone that was not involved in the complaint at Stage 1.

6.15	<p>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.</p>	<p>The landlord refers to 'Stage 2 work instructions' as evidence in its self-assessment and further that its "investigating officers are aware that where a complaint investigation cannot be completed within the required timeframe, the resident must be informed and kept updated".</p> <p>Similarly as observed against Code provision 5.9, the landlord does not set out complaint extension timescales as outlined by the Code. In this instance, the landlord should include that Stage 2 complaint extensions will be no more than 20 working days without good reason.</p> <p>Furthermore, the landlord has indicated in 9.3 of its policy that an officer will contact the complainant to let them know and provide a new response date. However, it does not set out that it will explain the rationale for its decision.</p>	<p>Recommendation for Haringey London Borough Council to review and update its policy to include that Stage 2 complaint extensions must be no more than 20 working days without good reason.</p> <p>Recommendation for Haringey London Borough Council to review and update its policy to include that it will contact the reason following any stage 2 complaint extension and explain the rationale for its decision including the expected timescale for response.</p>
6.16	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with contact details of the Ombudsman.</p>	<p>Please see commentary/observations against Code provision 6.5</p>	<p>A recommendation has been made in respect of Code provision 6.5 which addresses compliance with this provision.</p>

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.	Please see commentary/observations against Code provision 6.6	A recommendation has been made in respect of Code provision 6.6 which addresses compliance with this provision.
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