2 April 2026 **SENT VIA EMAIL** Bill Cullen Chief Executive Officer Hinckley and Bosworth Borough Council The Hub, Rugby Road Hinckley LE10 0FR	Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET Tel: 0300 111 3000 www.housing-ombudsman.org.uk

Dear Bill Cullen

Re: Complaint policy first review – Mandatory meeting

Thank you for providing the landlord's annual submission to us, which was received on 1 July 2025. We have now carried out a review of the landlord's complaint policy to assess compliance with the Compliant Handling Code (the Code).

The purpose of the policy review process is to support the landlord with assessing the changes required to its complaint policy, providing commentary and recommendations where revisions are required to comply with the Code. This supports in extending consistency across the sector, ensuring that residents receive a fair service, regardless of where they live and who provides housing services.

The review focussed on key provisions of the Code based on what residents can reasonably expect to be included in a complaints policy document.

Through the review process we have identified:

- 3 recommendations; and
- We require more information in accordance with Code provisions 5.4 and 5.5 regarding the landlord's third-party managing arrangements and the oversight of these.

Please see Appendix A at the end of this letter, setting these recommendations out.

NEXT STEPS

Due to the information, we require in relation to the landlord's third-party arrangements and how it oversees these, we want to discuss these and agree actions to support the landlord to meet the requirements of the Code. We require Hinckley and Bosworth Borough Council to attend an online meeting on 23 April 2025 at 14:00.

The meeting will focus on the following key areas:

- the recommendations – clarification and requirements
- action points to meet the policy recommendation.
- actions required to meet the requirements of the self-assessment.
- timeframe for actions to be completed.

If the landlord has any additional points it would like to include as part of the meeting, please let us know in advance. While we can assist with Code related questions and queries please note that we are unable to provide advice or updates on individual complaints or cases that are currently with our casework teams.

Meetings are held remotely via Microsoft Teams as standard. Should the landlord require an alternative platform such as Zoom or have difficulty accessing an online meeting, please do let us know as soon as possible by contacting compliance@housing-ombudsman.org.uk so we can discuss alternative arrangements.

ACTION REQUIRED

By no later than 16 April 2026 the landlord is required to confirm its attendance providing confirmation of who will be joining the meeting alongside their contact email address for the purposes of the meeting invites.

Should the meeting time or date not be convenient please come back to us as soon as possible with your suggested availability.

Please contact us at: compliance@housing-ombudsman.org.uk.

If the landlord does not respond by the above date, we may find it has failed to demonstrate compliance with the Code. The Ombudsman may take further action such as making a referral to the governing body or the Regulator of Social Housing.

If you require any further information or you are experiencing any difficulties, you must contact the Ombudsman Service compliance@housing-ombudsman.org.uk before the above date.

Yours sincerely

Paul Mallon
Duty to Monitor Officer
Duty to Monitor Team

Appendix A

Code Provision	Code Requirement	Commentary / Observations	Recommendation
5.4 5.5	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. Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	The landlord does not refer to a third party either in its self-assessment or on its September submission form. In 4.1 of its policy, the landlord does refer to a complaint response being handled by a third party. This suggests possible third-party involvement in the handling of complaints, rather than all stages being handled entirely by the landlord in house. In its self assessment, the landlord has recorded its compliance with the provision and refers to its policy as evidence, including the relevant section.	**Recommendation 1** Recommendation for the landlord to review its policy to clarify either that: • Complaints are handled entirely in house, with the landlord responsible for investigating the complaint and issuing both the Stage 1 and Stage 2 responses. Under this arrangement, the third party (e.g. the contractor) may provide information during the investigation to form the response, but the landlord remains solely responsible for issuing both the Stage 1 and Stage 2 responses; OR •Complaints are handled by a third party and form part of the landlord's complaint process. Under this arrangement, the policy should clearly be set out: • which third parties this applies to (e.g. the contractor); • whether residents should submit their complaint to the Council first (with the Council forwarding it and confirming who issues the acknowledgement), or whether complaints should be made directly to the third party, in which case the third parties contact details must be included; • whether the third-party handles Stage 1 only or both Stage 1 and Stage 2;

			• if only Stage 1 is outsourced, where and how residents should submit a Stage 2 escalation request;
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.	The landlord in 5.5 of its complaints policy that "when we inform a complainant about an extension to the timescale for a response, we will provide the complainant with contact details for the relevant ombudsman". However, the Code requirement is clear that where a response to a complaint falls outside the timescales set out in the Code, it should agree with the resident suitable intervals for keeping them informed about their complaint. In its self assessment, the landlord has recorded its compliance with the provision and refers to its policy as evidence, including the relevant section.	**Recommendation 2** Recommendation for the landlord to review and update its policy to include that it 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. Note: The term 'extended timescales' pertains to the period of time after the agreed extension period. For example, if the landlord has not issued a full response for a stage 1 within the initial 10wd period and also the agreed extension period (no more than 10wd without good reason). The intention of this provision is to ensure that the resident is kept informed on progress of their complaint, during the period that the response is delayed. This will involve agreeing with the resident on how often they will receive updates. Furthermore, this helps improve communication with residents.

6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	The landlord sets out in 5.10 of its policy that *"if all or part of the complaint is not resolved to the individual's satisfaction at stage 1, it will be progressed to stage 2 of the complaints process".* In 4.9 of the landlord's complaints policy, it states that the landlord *"reserves the right to escalate a complaint immediately to stage 2 in certain circumstances."* While the landlord may have operational reasons for exercising discretion, this provision has the potential to restrict a resident's ability from progressing their complaint through all stages of the complaints process. In particular, advancing a complaint directly to stage 2 may limit a resident's opportunity to have their concerns fully considered and resolved at stage 1, which is intended to provide early resolution and learning. In its self-assessment, the landlord has recorded its compliance with the provision, including the relevant section.	**Recommendation 3** Recommendation for the landlord to review and update its policy to include that residents will be permitted to progress their complaint through all stages of its procedure. This would help ensure that residents have a fair opportunity to have their concerns fully considered at each stage (this also supports Code provision 5.11)