# Diversity Impact Assessment

Title: HRA Housing Complaints Policy

Date: Reviewed in February 2025

Lead Officer: Aisling Sims – Policy and Partnership Manager

1. **Summary description of the proposed change**

What is the change to policy / service / new project that is being proposed?

How does it compare with the current situation?

The Complaints Policy has been reviewed and updated with minor amendments including:

• Alignment with the corporate complaints policy

• Alignment with latest legislation and complaint handling code outlined by the Housing Ombudsman.

• Clarification of what complainants can expect from us, for example – contact upon receipt of every complaint.

• Greater emphasis on learning from complaints and highlighting this to HRA tenants and leaseholders.

The HRA Housing team aims to facilitate an open and accessible complaints process. Tenants and leaseholders should feel empowered to tell us if things go wrong and can be assured that they will receive a timely and adequate response.

1. **Summary of evidence used to support this**

The HRA is owns approximately 3037 properties in Medway across Brompton, Gillingham, Twydall and Rainham. During the year 2023/24, the HRA complaint teams received 84 complaints. With 71 complaints resolved at stage 1 and 13 complaints escalating to stage 2. During the same period, 1 complaint was investigated by the Housing Ombudsman.

During 2023/24 76.1% of stage 1 complaints were responded to on time against a target of 75% and 100% of stage 2 complaints were responded to on time.

It is now a requirement for housing providers with a stock size over 1,000 to complete an annual survey known as Tenant Satisfaction Measures (TSM). As part of the 2023/24 survey TP09 satisfaction with complaint handing was reported at 26.2%. To improve satisfaction in this area, an improvement plan was developed and implemented which has resulted in an increase of 7% in the 2024/25 survey. To ensure continuous development, the complaints policy has been reviewed to capture these improvements:

• Contact made (primarily via telephone) upon receipt of every complaint

• Transactional survey to be carried out with every closed complaint.

• Responses are made in a way that suits the complainant, and all methods followed up in writing.

1. **What is the likely impact of the proposed change?**

Is it likely to :

* Adversely impact on one or more of the protected characteristic groups?
* Advance equality of opportunity for one or more of the protected characteristic groups?

Foster good relations between people who share share a protected characteristic and those who don’t?

Age: no impact

Disability: no impact

Gender reassignment: no impact

Marriage/civil partnership: no impact

Pregnancy/maternity: no impact

Race: no impact

Religion/belief: no impact

Sex: policy: no impact

Sexual orientation: no impact

Other (e.g. low-income groups): will advance equality

1. **Summary of the likely impacts**

* *Who will be affected?*
* *How will they be affected?*

It has not been identified that this policy will have a negative impact on any protected characteristic, as the policy will be applied universally to all HRA tenants and leaseholders.

1. **What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?**

* Are there alternative providers?
* What alternative ways can the Council provide the service?
* Can demand for services be managed differently

It is expected that the reviewed policy will advance equality for all groups as the Housing Team have greater scope in communicating with HRA tenants and leaseholders in ways that best suit them.

Learning from upheld complaints will also be fed back into the service so that issues relating to accessibility needs and considerations can be put into place.

Learning from the transactional surveys will be monitored at least quarterly to ensure that the process remains accessible and that complainants find that their responses are timely and adequate.

1. **Action plan**
2. **Recommendation**

The recommendation by the lead officer should be stated below. This may be:

* to proceed with the change, implementing the Action Plan if appropriate
* consider alternatives
* gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Proceed with the reviewed policy.

1. **Authorisation**

The authorising officer is consenting that:

* the recommendation can be implemented
* sufficient evidence has been obtained and appropriate mitigation is planned
* the Action Plan will be incorporated into the relevant Service Plan and monitored

Authorising Officer: Rebecca Wilcox – Chief Housing Officer

Date: February 2025