

## Appendix A: Self-assessment form

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 complaints 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	<p>Section 2 of our <a href="#">Complaints Handling Policy</a> (for housing complaints relating to our landlord services) sets out the definition: <i>‘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 resident or group of residents.’</i></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	<p>Our residents do not need to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction (as set out in section 2 of our <a href="#">policy</a>) we will give residents the choice of making a complaint.</p> <p>Section 1.6 of our <a href="#">policy</a> sets out that <i>‘If a resident prefers, they can authorise someone else to make a complaint on their behalf. This could be a</i></p>	

			<i>friend/relative or representative from an external organisation.'</i>	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Section 2.4 of our <a href="#">policy</a> sets out the difference between a service request and a complaint and Appendix A provides additional detail.  The number of service requests is monitored and kept under review alongside complaints. Analysis is undertaken quarterly and includes consideration of whether cases are being correctly categorised as service requests.	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Section 2.4 of our <a href="#">policy</a> sets out how we will respond to service requests and also states: <i>'If we need to make further enquiries to resolve the matter, the resident is dissatisfied, or if the resident asks us to at any point, we will log it as a complaint. We will continue to address any service requests after we have logged a complaint.'</i>	
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	Yes	The staff (both external and internal) that undertake our surveys are briefed on escalation routes and these are communicated to residents.	

	<p>complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>			
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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	We will accept a complaint unless it is outside of the jurisdiction of our <a href="#">policy</a> (section 2 and Appendix A). Each complaint is considered on an individual basis.	
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Section 2 and Appendix A of our <a href="#">policy</a> set out the circumstances in which a matter will not usually be considered as a complaint.	

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Section 2.3 of our <a href="#">policy</a> sets out that: <i>'We usually cannot consider events that occurred more than 12 months ago, or which the resident was made aware of more than 12 months ago. We may use our discretion to accept older complaints if there's good reason it had not been raised before.'</i>	
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	We will advise the complainant in writing if we cannot accept their complaint and to explain the reasons why. We will advise the resident that they can take that decision to the Housing Ombudsman.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	The first part of our stage 1 process is to contact the resident, and we are guided by the resident, as far as reasonably possible. We consider the individuals circumstances of the resident.	

### 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	<p>The Council's preferred method of contact is via our online complaints form. We encourage customers to use this form to submit their complaints as this is the most efficient method of contact and allows us to communicate with customers in a secure way.</p> <p>We will process complaints received by any method including:</p> <ul style="list-style-type: none"> <li>- In writing by letter</li> <li>- Through third party complaints software such as Resolver</li> <li>- By email via the Chief Executive's Office, or via the Leader's Office;</li> <li>- By email to the Resolution Centre (<a href="mailto:Wfdirect@walthamforest.gov.uk">Wfdirect@walthamforest.gov.uk</a>)</li> <li>- By email to the Information Officer (<a href="mailto:information.officer@walthamforest.gov.uk">information.officer@walthamforest.gov.uk</a>)</li> </ul> <p>We also sign post customer to seek assistance from our libraries service for support with completing the online form and the Resolution Centre can take complaints over the phone.</p>	

			Section 1.7 of our <a href="#">policy</a> sets out that ‘we will consider our duties under the Equalities Act 2010 and make reasonable adjustments for residents who may need to access the complaints process.’	
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	<p>All complaints procedures are published on Forest Connect (our intranet) and readily available to all staff. Staff also have access to the Complaints team for advice and guidance. Housing Teams have been briefed and there has been a lot of work undertaken to raise the profile of complaint handling.</p> <p>Contact Centre staff have been briefed that following advice to a resident that it is easy to log a complaint online, if the resident prefers making a complaint by phone, they will log this complaint on their behalf.</p>	
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	<p>Quarterly analysis is undertaken, this analysis includes considering cases that have been re-categorised as service requests or falling outside of jurisdiction, to ensure cases are not being incorrectly re-categorised.</p> <p>Learning from complaints is shared with Teams which helps embed a positive complaint culture.</p>	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the	Yes	Our policy sets out the two stage process and timeframes for responding. It is published on our website: Link to policy is located on this page: <a href="http://www.walthamforest.gov.uk/council-and-">www.walthamforest.gov.uk/council-and-</a>	

	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.		<a href="#">elections/making-complaint-or-compliment/complaints-and-compliments</a> Direct link to policy: <a href="#">Housing Ombudsman Complaints Policy.pdf (walthamforest.gov.uk)</a>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Section 1.9 of the <a href="#">policy</a> sets out that: <i>'This policy will be published on our website, together with details of the Housing Ombudsman Service. We will regularly publicise how to make a complaint in resident communications such as our resident newsletter.'</i> We promote how to make a complaint and how to access the Housing Ombudsman's services in our resident newsletter (pages 12-13) <a href="https://www.walthamforest.gov.uk/media/8114">https://www.walthamforest.gov.uk/media/8114</a>	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complainants can choose to have an advocate when making their complaint. There is allowance for this in our online form and we accept complaints made by third parties as long as they are able to provide written consent to show that they have authority to act on someone's behalf. Our <a href="#">policy</a> states at section 1.6 <i>'If a resident prefers, they can authorise someone else to make a complaint on their behalf. This could be a friend/relative or representative from an external organisation.'</i>	
3.7	Landlords must provide residents with information on their right to access the	Yes	We provide this information on our website at <a href="https://www.walthamforest.gov.uk/council-and-elections/making-complaint-compliment-">https://www.walthamforest.gov.uk/council-and-elections/making-complaint-compliment-</a>	

	<p>Ombudsman service and how the individual can engage with the Ombudsman about their complaint.</p>		<p><a href="#">or-claim/complaints-and-compliments</a></p> <p>Additionally, we provide information in our policy and when we acknowledge complaints at Stage 2 of our complaints procedure, where we advise customers that they will be given information about escalation to the appropriate ombudsman service if they remain dissatisfied with the Council's response.</p> <p>We promote how to make a complaint and how to access the Housing Ombudsman's services in our resident newsletter (pages 12- 13)</p> <p><a href="https://www.walthamforest.gov.uk/media/8114">https://www.walthamforest.gov.uk/media/8114</a></p>	
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## 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	Under our procedure, complaints at Stage 1 are dealt with by the service area who is responsible for providing the service. The Head of Service has responsibility for reviewing and signing off Stage 1 responses. We have a corporate Complaints Team whose staff have responsibility for processing all complaints received, and responsibility for investigating and responding to complaints at Stage 2 of our complaints procedure on behalf of the Council's Chief Executive. Our corporate Complaints Manager is in direct liaison with the Housing Ombudsman and ensures that the relevant directors are informed of maladministration cases. The Chief Executive gets told about all severe maladministration decisions and the actions taken to address them as well as the learning to help prevent them from recurring.	

4.2	<p>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.</p>	Yes	<p>Individual autonomy is devolved to complaints handlers, and they have an escalation route if required information is not provided. We also have escalation routes where information is required from contractors. Senior colleagues are also accessible to support.</p>	
4.3	<p>Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p>	Yes	<p>There has been a change of culture with a greater focus on prioritising and learning from complaints and Ombudsman decision. Our refreshed Complaints Tracker helps track learning from complaints and Ombudsman decisions including actions arising from them. These actions have informed the development of our Complaints Improvement Plan. All upheld Ombudsman cases are discussed at strategic level at HSLT and severe maladministration cases are discussed at SLT, Leaders Boards and Audit and Governance Committee.</p> <p>Comprehensive training was delivered by HQN to complaint handlers in March 2024.</p>	

			Additional temporary resources were introduced to support stage 1 repairs complaint handling. We are now reviewing how we embed these resources into our permanent structure.	
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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	Our <a href="#">policy</a> sets out how we will manage complaints that are within the Housing Ombudsman's Code. Section 1.8 of our policy states that <i>'We treat all residents fairly and will not treat a resident unfavourably because they have made a complaint.'</i>	
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	We have taken the proactive approach to quickly contact complainants and clarify issues and their expected outcomes where appropriate. In line with best practice we operate 1 and 2 complaint stages only.	
5.3	A process with more than two stages is not acceptable under any	Yes	We do not operate more than a two stages complaint process.	

	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
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	Third parties do not deliver complaint handling on our behalf. Our contractors work with the Council to support the complaint handlers' response to the complaint.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Third parties do not manage complaints on our behalf, they support residents to access our complaint process.	
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	Under our new Stage 1 complaint process, we will contact the resident whenever possible, at the start of the complaint investigation process to help us understand the complaint and clarify/confirm what outcome the resident is seeking.  Our stage 2 procedure is being reviewed to include the same process as above.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear	No		In the Autumn we are introducing a new system

	<p>which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.</p>			<p>which will pull the complaint information through to the acknowledgement.</p> <p>When we receive a stage 1 complaint, we contact the resident to clarify this.</p> <p>Our stage 2 procedure is being reviewed to include the same process as above.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<p>Service Areas are expected to be objective when dealing with Stage 1 complaints. Heads of Service have responsibility for taking corrective action when service failures or administrative faults are identified. Stage 2 complaints are dealt with by the corporate Complaints Team on behalf of the Chief Executive of the Council. Investigations are conducted on factual information. Information about the complaint is shared with those who need to be informed about it.</p>	
5.9	<p>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>	Yes	<p>Section 4 of our <a href="#">policy</a> sets out this commitment.</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	<p>Our <a href="#">policy</a> sets out at section 1.7 that: ‘When applying this policy, we will consider our duties under the Equalities Act 2010 and make reasonable adjustments for residents who may need to access the complaints process.</p> <p>We will keep a record of any reasonable adjustments agreed, and these are kept under review.</p>	
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	<p>It is our usual practice to allow a complaint to go through all stages of our complaints procedure. If we decline to accept a complaint at any stage of our procedure, we advise the complainant of the reason for this. The most common circumstance when we do not accept a complaint under our complaints procedure, is when the subject matter of the complaint is considered to be outside the jurisdiction. When we make a decision to not accept a complaint or to not allow it to go through the complaints procedure, we provide an explanation of this to the complainant and advise them of their escalation rights to the</p>	

			ombudsmen service should they disagree with our position.	
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	Information about the complaint investigation is held by the service areas or the complaints team depending on the stage of the complaint. This information is usually stored on shared drives, emails and service area databases. All complaints are recorded on our customer service portal, which hold information about both stages of the complaint and responses issued.	
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.		<p>Our complaints procedure encourages the use of action plans to identify where service failures have occurred and what action will be taken to put things right.</p> <p>Remedies offered are in line with our compensation policy.</p> <p>Service Areas are expected to take appropriate and timely action to ensure that remedies promised after a complaint investigation are completed. Information is provided in our complaint responses when monetary compensation is</p>	

			offered, setting out the amount and the reason why the compensation is offered.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	We have a Policy for Dealing with Unreasonable Behaviour, which includes sections about dealing with unreasonable complaints and complainants. This is published on our <a href="#">website</a> . This policy was recently reviewed and the review incorporated learning from complaint cases and added more detail about the management of restrictions.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our Policy for Dealing with Unreasonable Behaviour states: When implementing this policy, the Council will have regard to the Equality Act 2010 and show due regard to an individual's medical condition or vulnerability such as mental health and learning disabilities, as and when applicable. Any restrictions imposed on a customer's contact will recognise and be appropriate to the individual's circumstances.	

## 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	We contact the resident by telephone to attempt to resolve the matter as quickly as possible and to ensure we understand the needs of the resident and any vulnerabilities.	

6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Our process reflects this since 1 <sup>st</sup> April 2023. An acknowledgement is automated at receipt generating a unique reference. Stage 1 complaints handlers are required to follow up with the complainant within 48 hours of receipt to clarify any ambiguity.	
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Our process reflects this since 1 <sup>st</sup> April 2023. We are working to a 10-working day response time for stage 1 complaints in line with the Code. This applies from the point the complaint is acknowledged and logged.	
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	Where possible, we will make contact with the resident to agree the extension. The extension is confirmed in writing. The reasons for the extension are clearly explained.	

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	We have updated our processes to incorporate this requirement.	
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	<p>Written complaint responses are sent to the resident when the answer to the complaint is known and the response timescales in our updated processes reflect the timescales of the Code. Where there are any outstanding actions, these are listed within the written response with target dates.</p> <p>We use a tracker to monitor the outstanding actions.</p>	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our internal guidance for complaints handling includes this.	
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	Yes	We allow additional issues into a complaint investigation, as long as those issues are related to those that are already under investigation. Any new issues are treated as a new complaint.	

	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.			
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Our internal guidance and Stage 1 response template include this.	

### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Once a Stage 1 investigation is concluded, the Stage 1 response letter will include information about how the complainant can escalate their complaint to Stage	

			2. When we cannot accept a Stage 2 complaint or consider it to be outside jurisdiction, we advise the complainant in writing and advise them of their right to escalate the complaint to the relevant ombudsman service.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	We have a template to acknowledge, define and log Stage 2 complaints within 5 working days in line with code.	
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	Under our new complaints procedure residents are not required to explain or give any reason for requesting a stage 2, although we will ask for the information to help us understand how best to resolve.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage 2 complaints are dealt with by the corporate complaints team on behalf of the Chief Executive.	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	No		Our published timescale for investigating and responding to all landlord services related Stage 2 complaints services is 20 working days. This applies to all complaints relating to landlord services

				that we deal with at Stage 2 and falls within the jurisdiction of the Housing Ombudsman Service. We have been experiencing unexpected absence in the Team which has made it difficult to meet the 20 day timescale. Resourcing have been adjusted to provide additional support.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Our <a href="#">policy</a> sets out within section 4 that: <i>'if, for any reason, we need more than 20 working days to respond to the complaint, we will explain why and inform the resident of the expected timescale for our response. Any extension will be no longer than 20 working days unless there is a good reason, which will be explained to the resident.'</i>	
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.	No		At stage 2 we are currently informing residents of any delays in response. Currently Housing Ombudsman details are provided with the Stage 2 response, but we are updating our procedures to include them when informing a resident about an

				extension to the timescale. This will be in place by the end of August and prior to go live of our new system.
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	We issue our response to the resident when the answer to the complaint is known. Whenever possible, we provide complainants with information about when outstanding actions will be taken. We use a tracker to monitor the outstanding actions. The new system we are introducing has the functionality to do this within the system. The new system will be implemented in the Autumn.	
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	Our internal guidance for complaints handling includes this.	
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; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes	Our internal guidance and Stage 2 response template include this.	

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our internal guidance and Stage 2 response template include this.	

### 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> </ul>	Yes	Our complaints procedure encourages the use of action plans to identify where service failures have occurred and what action will be taken to put things right.	

	<ul style="list-style-type: none"> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 5 of our <a href="#">policy</a> summarises our position on remedies and includes that <i>'The remedy offered will reflect the impact on the resident that resulted from the issue identified in the complaint.'</i>	
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	Service Areas are required to take appropriate and timely action to ensure that remedies committed to during a complaint investigation are completed. These commitments are monitored on a tracker. Information is provided in our complaint responses when monetary compensation is offered, setting out the amount and the reason why the compensation is offered.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our housing transformation programme is incorporating this guidance. We also review Housing Ombudsman determinations which helps guide future decisions on remedies.	



## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	We have produced an annual report which is being published alongside this self-assessment.	
8.2	The annual complaints performance and service improvement report must be	Yes	The report is being presented to the Governance Board alongside	

	reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.		this self-assessment and will be published alongside the response to the report.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We will repeat the self-assessment following significant change.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We commit to carrying out a review and update of our self-assessment if requested 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	If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance.	

## 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	When investigating Stage 1 complaints, service areas are expected to review whether there are any systemic issues that need to be addressed. When complaints are investigated at Stage 2, complaints officers make recommendations to the service areas for service improvement where failures are identified.	
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	We use analysis of complaints, results of complaints TSMs, transactional surveys and learning from complaints and ombudsman findings to identify themes and trends to inform improvement plans and policy and procedure change. We undertake quarterly analysis of complaints data. Learning from complaints is shared across service areas and used to identify opportunities for improvement.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and	Yes	Complaints handling within the Council is reviewed by Governance Board and by the Audit & Governance Committee.	

	improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		There are other committees within the council who scrutinise the Council's activities, and scrutiny meetings include reviews of complaints that fall within the jurisdiction of that committee.	
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	Mark Hynes, Corporate Director of Governance and Law is the Council's lead person accountable for complaint handling.	
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	Cllr Paul Douglas has lead responsibility for complaints.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Complaints handling within the Council is reviewed by Governance Board and by the Audit & Governance Committee. There are other committees within the council who scrutinise the Council's activities, and scrutiny meetings include reviews of complaints that fall within the jurisdiction of that committee.	
9.7	As a minimum, the MRC and the	Yes	Complaints handling within the	

	<p>governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>		<p>Council is reviewed by Governance Board and by the Audit &amp; Governance Committee. There are other committees within the council who scrutinise the Council’s activities, and scrutiny meetings include reviews of complaints that fall within the jurisdiction of that committee.</p> <p>When a finding of maladministration is made by the ombudsmen services, our complaints procedure provides for disclosure and reporting of that finding to the Chief Executive and senior directors, and to Audit &amp; Governance Committee.</p> <p>Recent example reports:</p> <ul style="list-style-type: none"> <li>• <a href="#">Cabinet Report 9 May 2024</a> <ul style="list-style-type: none"> <li>○ <a href="#">Appendix 1 to Report</a></li> </ul> </li> <li>• <a href="#">Housing Scrutiny Committee Report 17 April 2024</a></li> </ul>	
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> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for</li> </ul>	Yes	<p>Mandatory training was delivered to all complaints handling staff in March 2024. The session was delivered by HQN (The Housing Quality Network) and covered the following themes:</p> <ul style="list-style-type: none"> <li>• Framework for social housing complaints</li> </ul>	

	<p>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 relevant professional body.</p>	<ul style="list-style-type: none"> <li>• Importance of complaint handling</li> <li>• Complaint Handling Code</li> <li>• Effective complaint handling: key aspects</li> <li>• Insurance claims and the Pre-Action Protocol for housing conditions</li> <li>• Things to consider, what to include and creative solutions</li> <li>• Effective written responses and guidelines</li> <li>• Learning from complaints</li> <li>• Recent, current and future developments in complaint handling</li> </ul> <p>Our policies, procedures, templates and guidance are available to all staff on our intranet.</p> <p>Embedding improvements into our complaint handling is included in our Housing Department Service Plan for 2024/25 and these actions are then incorporated into team and individual objectives.</p>	
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