

## 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 |
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| 1.2            | A complaint must be defined as:<br><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>  | Yes              | <b>This is clearly set out in point 4.1 of the Complaints Standard which states:</b> “A complaint is any expression of dissatisfaction, however made, about the standard of service, actions, or lack of action, by the Housing Service, its own staff, or those acting on its behalf (such as a partner or contractor), affecting and individual resident or group of residents and that requires a response.”              |                          |
| 1.3            | 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. | Yes              | <b>This is set out within point 4.3 of the Complaints Standard which states:</b> “The word “complaint” does not have to be explicitly used for it to be treated as such. The Housing Reviews and Complaints Team will make initial contact with the resident or service user and clarify with them if they wish for it to be a complaint to be handled in line with the Complaints Standard, or if it is a service request.” |                          |

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|     |  |     | <b>points 5.1 and 8.13</b> reference complaints submitted via third parties.   |   |
| 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 | <b>This is explained in point 4.3 of the Complaints Standard which states:</b> <i>“The Housing Reviews and Complaints Team will make initial contact with the resident or service user and clarify with them if they wish for it to be a complaint to be handled in line with the Complaints Standard, or if it is a service request, whereby a resident or service user is unhappy with a situation that they wish to have rectified, and co-ordinate accordingly.”</i> | Where it is established that the complaint is actually a request for service, it is then distributed to the relevant team/service area for logging, monitoring and reviewing in line with their internal processes. |
| 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 | <b>This is referred to in point 8.10 of the Complaints Standard which states:</b> <i>“Outstanding actions must still be tracked and actioned expeditiously, with regular updates provided to the resident, service user or their representative.”</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  | Yes | <b>This is clearly explained in point 6.1 of the Complaints Standard which states:</b> <i>“Survey feedback and requests for service, need not be treated as</i>  |   |

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|  | <p>aware of how they can pursue a 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> |  | <p><i>complaints, however, where possible, the Council will make the respondent aware of how they can pursue their dissatisfaction as a complaint if they wish to."</i></p> |  |
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## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
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| 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              | <p><b>This is stipulated in point 6.2 of the Complaints Standard which states</b> <i>“If the Council decides not to accept a complaint, a detailed explanation must be provided to the complainant or their representative, setting out the reasons why the matter is not suitable for the complaints processes”</i></p> <p><b>Point 8.13 of the Complaints Standard describes the complaint handler’s commitment to</b> <i>“Approach all complaints acting independently, sensitively and with an open mind free of bias, prejudice, or conflict of interest.”</i></p> |                          |
| 2.2            | 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   | Yes              | <b>Point 6.1 of the Complaints Standard lists exclusions.</b>   |                          |

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|     | <p>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> |     |   |  |
| 2.3 | <p>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.</p>  | Yes | <p><b>This is clearly explained in point 6.1 of the Complaints Standard which states:</b><br/> <i>“Complaints made more than one year after the resident or service user became aware of the issue (unless there are exceptional circumstances), due to the passage of time.”</i></p> |  |
| 2.4 | <p>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</p>  | Yes | <p><b>Points 6.2, 8.3 and 8.8 of the Complaints Standard. Point 8.8 states:</b> <i>“Where it is decided the complaint will not be escalated, the reasons why will be explained to the complainant fully both verbally and in writing, within ten working days. The</i></p>            |  |

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|     | fairly applied, the Ombudsman may tell the landlord to take on the complaint.  |     | <i>communication will also outline the process of recourse to the relevant Ombudsman at this stage, should they wish to challenge the decision."</i> |  |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | <b>Careful consideration of each individual complaint is described in points 6.1 and 6.2 of the Complaints Standard</b>                              |  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 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><b>Our methods of contact are listed in Section 16 of the Complaints Standard.</b></p> <p><b>Point 17.1 of the Complaints Standard states:</b> <i>“The Housing Service will make this Standard available in a clear and accessible format for all residents and service users.”</i></p> | Methods of contact given are in person, over the telephone, in writing, by email and digitally.                                 |
| 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><b>Point 8.2 of the Complaints Standard states:</b> <i>“Any complaint relating to Housing Services, howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt.”</i></p>  | The complaints officer meets with all Housing Services Management Teams on a regular basis to discuss complaints and processes. |
| 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><b>Section 1.2 of the Complaints Standard states:</b> <i>“We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on</i></p>                            |   |



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|     |  |     | <p><i>how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them."</i></p> <p><b>Our methods of contact are clearly set out in section 16 of the Complaints Standard.</b></p>  |  |
| 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 | <p><b>Sections 8, 9 and 17 of the Complaints Standard</b></p>   |  |
| 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 | <p><b>Point 18.6 of the Complaints Standard states:</b> <i>"This Standard will be reviewed annually, at the same time as the requirement for annual, self- assessment and at any time whereby there is a significant restructure and / or change in procedures. The outcomes must be reported to members, published on the website and in the annual report."</i></p> |  |

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| 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 | <b>Point 5.1 of the Complaints Standard states:</b> <i>“A complaint can also be raised by someone who has been directly affected by such a service, or who is representing a resident or service user, with the resident or service users' consent, including, but not limited to Elected Members.”</i> |   |
| 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 | <b>Points 8.3 and 8.6 of the Complaints Standard. Point 8.3 states:</b> <i>“The communication will also outline the process of recourse to the relevant Ombudsman at this stage, should the resident, service user or their representative wish to challenge the decision.”</i>                         | The resident is also informed of their right to access the Ombudsman Service in our complaint acknowledgement and response letters. |

## 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              | An established Senior Review Officer (Complaints Officer) has the responsibility for complaint handling, liaison with the Ombudsman and reporting to the Corporate Management Team and the portfolio holder.   |  |
| 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              | <b>Point 8.13 of the Complaints Standard states that the complaint handler will always:</b><br><i>"have access to any staff at all levels to facilitate quick resolution and will have the authority and autonomy to act to resolve any dispute quickly and fairly."</i> |  |
| 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 seen as a  |                  | <b>Partially reflected in points 3.1 and 3.2 and section 18 of the Complaints Standard</b> , this is more evidenced in our internal process.   | Staff throughout the services are trained in recognising a complaint and channelling the complaint through to the Senior Review Officer. |

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|  | core service and must be resourced to handle complaints effectively |  |  |  |
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## Section 5: The Complaint Handling Process

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
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| 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              | We have a single Housing Services Complaint's & Enquiries Standard   |                          |
| 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              | <b>Section 8.1 of the Complaints Standard states:</b> <i>"Housing Services will apply a two stage complaints process."</i> |                          |
| 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 delay access to the Ombudsman.  | Yes              | <b>Section 8.1 of the Complaints Standard states:</b> <i>"Housing Services will apply a two stage complaints process."</i> |                          |
| 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                    | Yes              | Our complaints are not handled by third parties.   |                          |

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|     | expected to go through two complaints processes.   |     |  |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | Our complaints are not handled by third parties.   |  |
| 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 | <p><b>Point 8.2 of the Complaints Standard states:</b> “All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear.”</p> <p><b>Point 8.7 states:</b> “The Housing Reviews and Complaints Team will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response.”</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.   | Yes | <p><b>Point 8.2 of the Complaints Standard states:</b> “All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear. The acknowledgement must set out the understanding of the outstanding issues and any</p>  |  |

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|      |  |     | <i>outcome/s the resident or service user is seeking.”</i>  |  |
| 5.8  | At each stage of the complaints process, complaint handlers must: <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 | <b>This is reflected in Section 3 of the Complaints Standard, Our principles, and throughout point 8.13.</b>  |  |
| 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 | <b>Point 8.6 of the Complaints Standard states:</b> <i>“If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not exceed a further ten working days without good reason.”</i> |  |
| 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   | Yes | <b>Section 17.2 of the Complaints Standard.</b> The complaints officer records and shares vulnerabilities with Service managers investigating.  |  |

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|      | resident has disclosed. Any agreed reasonable adjustments must be kept under active review.   |     |   |  |
| 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 | <b>Explained in point 8.7 of the Complaints Standard</b>  |  |
| 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 | A full record, as described, is held within the CX Housing Management System and SharePoint.  |  |
| 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 | <b>Point 10.1 states:</b> <i>“Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.”</i> |  |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords   | Yes | <b>This is set out very clearly in section 15 of the Complaints Standard.</b>   |  |

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|      | must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.                                    |     |  |  |
| 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 | <b>Point 17.2 of the Complaints Standard states:</b> <i>“The Housing Service will comply with the Equality Act 2010 and may adapt normal policies, procedures, or processes to accommodate an individual’s needs in line with the Act and ensure that relevant officers are appropriately trained to deal with such requests.”</i> |  |



## 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              | <b>Section 10 of the Complaints Standard. Point 10.1 states:</b><br><i>“Complaints can be resolved in several ways. We intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result. Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.”</i>                                     |                          |
| 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              | <b>Point 8.2 of the Complaints Standard states:</b> <i>“Any complaint relating to Housing Services, howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt. All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear.”</i> <b>and Section 9 of</b> |                          |

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|     |   |     | <b>the Complaints Standard gives the timescale:</b> <i>“Logging and acknowledgement (All) Five working days”</i>   |  |
| 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 | <b>Section 9 of the Complaints Standard gives the timescale:</b> <i>“Stage 1 response (Complaint accepted) Ten working days from receipt of complaint”</i>   |  |
| 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 | <b>Point 8.6 of the Complaints standard states:</b> <i>“If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not exceed a further ten working days without good reason.”</i> <b>And the timescale is also given in section 9 of the Complaints Standard</b> |  |
| 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 | <b>Point 8.6 of the Complaints Standard states:</b> <i>“Where an extension period cannot be agreed, then the complainant will be provided with the relevant Ombudsman details, should they wish to challenge the Council on the standards.”</i>  |  |

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| 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 | <b>Point 8.10 of the Complaints Standard states:</b> <i>“All complaint responses must be sent to the resident, service user or their representative when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.”</i>   |  |
| 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 | <b>Point 8.13 of the Complaints Standard includes:</b> <i>“Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.”</i>   |  |
| 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 | <b>Point 8.11 of the Complaints Standard states:</b> <i>“Consider incorporating additional complaints made during any investigation period if they are relevant and if the response has yet to be issued. Where the response has been issued, or investigation would unreasonably delay the response, then a new complaint should be opened.”</i> |  |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  | Yes | We use a template resolution letter at Stage 1 that includes all the points listed.   |  |

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|  | a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. |  |  |  |
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## Stage 2

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
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| 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              | <b>Point 8.7 of the Complaints Standard states:</b> <i>"If the resident, service user or their representative remains dissatisfied with any outcome, the complaint will be progressed to Stage 2."</i> |                          |
| 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              | <b>Point 8.9 of the Complaints Standard states:</b> <i>"Where an escalation has been accepted, then Stage 2 will be acknowledged within five working days"</i>   |                          |
| 6.12           | Residents must not be required to explain their reasons for requesting a   | Yes              | <b>Point 8.7 of the Complaints Policy states:</b> <i>"Customers are</i>  |                          |

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|      | stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.  |     | <i>not required to explain their reasons for requesting a Stage 2 consideration. The Housing Reviews and Complaints Team will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response."</i>  |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | <b>Point 8.7 of the Complaints Standard states:</b> <i>"A tier four Manager, or Assistant Director, in their absence, will then review the stage 1 process and in discussion with the complainant, decide if there are grounds to escalate the complaint to Stage 2."</i>             | Tier 4 managers will only be expected in exceptional circumstances to respond to Stage 1 complaints and so will not be the same person that considered the complaint at stage 1. |
| 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.  | Yes | <b>Point 8.9 of the Complaints Standard states:</b> <i>"A formal written response will be provided to the complainant within twenty working days". The timescale is also given in Section 9.</i>  |  |
| 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 | <b>Point 8.6 of the Complaints Standard states:</b> <i>"If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not</i> |  |

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|      |   |     | <i>exceed a further ten working days without good reason.”</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.  | Yes | <b>Point 8.6 of the Complaints Standard states:</b> <i>“Where an extension period cannot be agreed, then the complainant will be provided with the relevant Ombudsman details, should they wish to challenge the Council on the standards.”</i>  |  |
| 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 | <b>Point 8.10 of the Complaints Standard states:</b> <i>“All complaint responses must be sent to the resident, service user or their representative 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 expeditiously, with regular updates provided to the resident, service user or their representative.”</i> |  |
| 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 | <b>Point 8.13 of the Complaints Standard states:</b> <i>“Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.”</i>  |  |

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| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied.</li> </ul> | Yes | We use a template resolution letter at Stage 2 that includes all the points listed.   |  |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.   | Yes | <b>Point 8.9 of the Complaints Standard states:</b> <i>"Give any complainant, Officer or Contractor who is subject to the complaint, a chance to set out their position and comment on any adverse findings before a final decision is made."</i> |  |

## Section 7: Putting things right

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
| 7.1            | Where something has gone wrong a landlord must acknowledge this and set | Yes              | <b>Point 10.1 of the Complaints Standard states:</b> <i>"Where</i> |                          |

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|     | <p>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> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> |     | <p><i>something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or intended to be taken to put things right, and by when.”</i><br/> <b>Point 10.2 lists remedies.</b></p> |  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes | <p><b>Point 10.1 of the Complaints Standard states:</b> <i>“We intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result.”</i></p>                   |  |
| 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 | <p><b>Point 10.1 of the Complaints Standard states:</b> <i>“Where something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or</i></p>                                    |  |



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|     |  |     | <i>intended to be taken to put things right, and by when.”</i>   |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | <b>Remedies are described in Section 10 of the Complaints Standard</b> , and these have been aligned with the Ombudsman’s Complaint Handling Code. |  |

## 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 produce an Annual Report which includes the list as identified in 8.1 |                          |

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| 8.2 | The annual complaints performance and service improvement report must be 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.                       | Yes | The Annual Report and Self-Assessment are considered by the Council's Corporate Management Team and their response is published alongside these. |  |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | n/a | There has been no merger or restructure however it is in our standard, <b>point 18.6</b> should one occur.                                       |  |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | n/a | We have not been asked to review and update the self-assessment following an Ombudsman investigation.  |  |
| 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. | n/a | We are currently complying with the code.  |  |

## 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              | <b>Point 10.2 of the Complaints Standard includes a remedy:</b> <i>“Changing Policies, Procedures and working practices, with inclusion of a resident panel and within the confines of legislation and regulation.”</i>  |                          |
| 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              | <b>Point 1.2 of the Complaints Standard states:</b> <i>“We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them.”</i> |                          |
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and   | Yes              | <b>Points 1.2 of the Complaints Standard as above. Point 18.4 of the Complaints Standard states:</b> <i>“Housing Services will</i>   |                          |

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|     | improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.  |     | <i>report back on wider learning and improvements resulting from complaints in the annual report, more regularly through service wide web pages to residents, service users and elected members."</i> |  |
| 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 | At Stage 1 we have a Housing Complaints Team with a Senior Review Officer, and Stage 2 we have the Heads of Service, who carry out analysis and make recommendations.                                 |  |
| 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 Bill Hartnett, Portfolio Holder for Housing, is our MRC.   |  |
| 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 | Quarterly Portfolio Holder Meetings are held with our MRC.  |  |

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| 9.7 | <p>As a minimum, the MRC and the 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> | Yes | <p>Quarterly Portfolio Holder Meetings and referred to within <b>Point 18.3 of the Complaints Standard which states:</b></p> <p><i>"Complaint and enquiry reports for Housing Services will be shared and reviewed with the Housing Service Management Team at least quarterly and Corporate Leadership Team, with the intention of taking collective responsibility for shortfalls identified through complaints and to maintain professional standards in dealing with complaints."</i></p> <p><i>The self assessment and annual performance report will be presented to the Council's Executive Committee for approval annually.</i></p> |  |
| 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 any shortfalls identified through</li> </ul>   | Yes | <p>Complaints and Enquiries Standard – <b>Referred to in Section 3, Our Principles</b></p>  |  |

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|  | complaints, rather than blaming others;<br>and<br>c. act within the professional<br>standards for engaging with complaints<br>as set by any relevant professional<br>body. |  |  |  |
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