

# Housing Ombudsman Code - Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

## Section 1 - Definition of a complaint

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as:  <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>	Yes	Under the Complaints Policy a complaint is defined as <i>'an expression of dissatisfaction about the Council's provision of, or failure to provide, a service for which it has responsibility and when it has not been put right any service failure in a reasonable timescale'</i>  For full details see below link:  <a href="#">For complaints made after 30/11/2023 - Corporate complaints and compliments procedure   The London Borough Of Havering</a>

1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.		Any contact received by the Insight, Information, and Investigations team, through any avenue, that states there is a failure of service will be treated as a complaint
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.		Any information received during the Stage One complaint may be considered before the response is due if timescales permit.  If we are unable to complete our investigation in the agreed timescale, any new issue will be logged as a complaint and dealt with through the Complaints process
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.		All complaints are considered on an individual basis, where a complaint will not be accepted this will be explained in full.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.		Details of complaints that will not be accepted, can be found in the below policy document:  <a href="#">For complaints made after 30/11/2023 - Corporate complaints and compliments procedure   The London Borough Of Havering</a>
1.9	If a landlord decides not to accept a complaint, a detailed 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.		In the circumstance that the issue is not considered a complaint, the customer will be contacted and notified of the reasons why and what actions have been taken instead.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.		There is a clear definition in the Policy regarding what is considered a complaint.  Officers are trained to recognise the difference between a request for service and being unhappy with a situation or a service provided
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.		At present we do not use survey feedback on complaints. This is planned to be implemented in the future

### Section 2 - Accessibility and awareness

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints can be reported via the online complaints form, telephone via the Call Centre or face to face. Officers can report complaints online for customers.  Complaints can also be accepted via email and in the form of a letter.

<p><b>2.3</b></p>	<p>Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.</p>	<p>Yes</p>	<p>The full Policy can be found online via the below link:</p> <p><a href="#">For complaints made after 30/11/2023 - Corporate complaints and compliments procedure   The London Borough Of Havering</a></p> <p>A paper copy can be provided on request in all formats, such as Braille or translated. A copy can also be downloaded via the above link.</p> <p>A quick guide for customers can also be found via the below link:</p> <p><a href="#">The Council's complaint procedure   Complaints   The London Borough Of Havering</a></p>
<p><b>2.4</b></p>	<p>Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.</p>	<p>Yes</p>	<p>Details of the Policy can be found online via the Havering Council website:</p> <p><a href="#">For complaints made after 30/11/2023 - Corporate complaints and compliments procedure   The London Borough Of Havering</a></p> <p>Details of how to raise a complaint can be found on the same website:</p> <p><a href="#">Complaints   Complaints   The London Borough Of Havering</a></p>

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	All policies have an Equality Impact Assessment carried out before publishing
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>The policy and process are publicised as advised in point 2.4</p> <p>The below website provides details around the Housing and LGSCO Ombudsman. There is a link on this page to both websites, which includes the Housing Ombudsman Complaints handling code:</p> <p><a href="#">Contacting the Ombudsman   Complaints   The London Borough Of Havering</a></p> <p>In addition, this self-assessment by against the code is also publicised.</p> <p>Further publication of the Policy and the Code will be in future communications to customers.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Details of the Ombudsman are provided at every stage of the complaints process
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Information regarding the Ombudsman is provided with each acknowledgement or decline, and with each response at both stages of the complaint.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	No	Channels are in place with our customers via social media. To use this as a channel for managing complaints will be looked at over the next financial year.

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	The Customer Insight, Information and Investigation team covers all complaints received into the Council. All reports and learning from is dealt with via this team. Implemented in September 2023.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All officers are trained on Complaints, Equality, diversity, and inclusion. Officers are continuously learning and training around complaints handling and enhancing their skills.  All officers investigating complaints are placed outside the service areas, which the complaints relate to. Any conflict of interest that is recognised with an officer,

			the case would be re-assigned to another officer to investigate
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	Complaints officers have full autonomy from Assistant Directors and Directors as well as three Team Leaders in place within the team.  All officers are trained to treat all customers sympathetically, as well as provide support when required. Complaints officers have good on-going relationships with all within Housing Services

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable	Yes	All decisions are relayed to the customers and the reason behind this decision. All evidence is saved via the complaints system, which provides a full audit.

	<p>delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>		<p>Havering Council operates a Two stage process for Housing complaints and there is no informal process.</p> <p>All complaints are logged within 3 working days.</p>
4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	<p>The Complaints triage team will review the complaint and acknowledge their understanding of the complaint and expected outcome.</p> <p>If clarification is required, they will contact the customer</p>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Yes	<p>All complaints are investigated by an independent officer outside of the relevant service area.</p> <p>Should the complaint be escalated to Stage two. The complaint will be allocated and investigated by a different officer from that at Stage One. This officer will still be independent of the relevant service.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<p>All complaints officers investigate cases based on evidence. Officers are trained to treat all customers fairly and impartially and consider the situation and vulnerabilities when investigating a complaint. All officers are trained in Data Protection.</p>



4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>All requests for reasonable adjustments are adhered to. We will contact customers based on their preferred method.</p> <p>In the instance that the customer requires a telephone call, this will be followed up with written communication either via email or letter. All written correspondence can be printed in a different language or Braille.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>All complaints with staff will be addressed with the staff member and allow them time to provide comment.</p> <p>Complaints against residents are dealt with through their Housing officer and not through the Corporate Complaints process.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>The Policy states the timescales regarding escalations, and this can be found via the following link in the quick guide for customers:</p> <p><a href="#">The Council's complaint procedure   Complaints   The London Borough Of Havering</a></p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a	Yes	<p>Details of rights to escalate and elements that will be considered can be found in the policy link below:</p>

	landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		<a href="https://www.havering.gov.uk/complaints-and-compliments-policy-and-procedures-2023">Complaints and Compliments Policy and Procedures 2023 (havering.gov.uk)</a>
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	All correspondence in relation to the complaint is stored in the complaints management system.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Vexatious complaints are covered under on page 9 of the policy

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Complaints officers will explain to customers as early as possible if the outcome they request is not possible and why
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	All complaints are responded to as quickly as possible.  We have a triage team in place to resolve any early resolution and pick up any urgent issues
4.5	Landlords should 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 where this is reasonable.	Yes	We will allow third parties to act on our customers behalf where General Data Protection consent has been given.  In particularly vulnerable situations we may waiver the consent, where possible
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Any legal obligations will be stipulated and referred to legal if required. The customer will be updated

<p><b>4.9</b></p>	<p>Communication with the resident should not generally identify individual members of staff or contractors.</p>	<p>Yes</p>	<p>Where a complaint has been received that mentions a particular staff name, the name may be referred to in the complaint response. If the outcome is data protected the name will not be relayed to the customer</p> <p>If there is a failing by a particular contractor that the customer has already mentioned, the name of the contractor may be referred to in the response but not the direct name of any staff working with or for the contractor</p>
<p><b>4.10</b></p>	<p>Landlords should keep residents regularly updated about the progress of the investigation.</p>	<p>Yes</p>	<p>All complaints are acknowledged within 3 working days and if we are unable to respond within 10 working days, the customer will be informed and provided with a new target date for the response, and this will be no later than a further 10 working days</p>
<p><b>4.16</b></p>	<p>Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.</p>	<p>No</p>	<p>We will be implementing surveys and for feedback in the future</p>
<p><b>4.17</b></p>	<p>Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained</p>	<p>No</p>	<p>We have implemented a new case management system and under our new structure there is a team dedicated to service improvement.</p> <p>Once the new team and system is fully operational, we will implement future service delivery and more training and support in full.</p>

4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	All customers are entitled to raise a complaint. There are several avenues for a complaint to be raised and in cases with unacceptable behaviour officers may be given a complaints officer as their point of contact.
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## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Stage One complaints are targeted to be responded to within 10 working days. If an extension is required, this must be justified and agreed by a manager.  If an extension is agreed, the customer will be provided with an explanation and a new target date no later than a further 10 working days
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	A response is sent to the customer once the investigation has been completed.  Any follow up actions agreed in the complaint will be monitored.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	All responses are answered in full, and details referenced where needed.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> </ul>		The Stage One response provide these details

	<ul style="list-style-type: none"> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>		
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## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Where a Stage Two complaint is declined, the reason will be explained to the customer and the details of the Ombudsman will also be provided.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	All Stage Two complaints are acknowledged and the details of the complaint and expected outcome are included in the Stage Two acknowledgement.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Stage Two complaints will only be accepted where a Stage One has been completed and the resident has requested it.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage Two cases will be handled by an officer different to the officer that investigated at Stage One.

5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Stage Two complaints are targeted to be responded to within 20 working days. If an extension is required, this must be justified and agreed by a manager.</p> <p>If an extension is agreed, the customer will be provided with an explanation and a new target date no later than ten working days beyond the original target date.</p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	<p>All Complaints responded to at Stage Two provide this information.</p> <p>We do not have a third stage in our process and therefore, details of the right to escalate to the Ombudsman are provided in the Stage two response</p>

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	We do not operate a Stage Three process
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	N/A	We do not operate a Stage Three process

## Best practice 'should' requirements

### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Where the complaint must be extended by 20 days, this will need to be agreed by a manager and verified with the customer
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	If agreement cannot be reached with the customer for the extension of 20 days, the Ombudsman details will be provided to the customer

5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	<p>All elements of the complaint are considered as part of the investigation.</p> <p>However, if the last contact regarding the matter is more than 12 months old, we will consider whether this is viable to investigate due to the time that would have passed and whether to accept this element of the complaint</p>
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	<p>If the issue is raised during the investigation, where this will not delay the response, this may be considered as part of the complaint.</p> <p>However, if the information will delay the response or is a new issue, we may consider the issue as a new complaint</p>

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	We will agree this with the customer in writing or verbally and follow up with written confirmation.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	The Ombudsman details are provided if the customer is not in agreement with the extension.



### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not operate a Stage Three process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not operate a Stage Three process

### Section 6 - Putting things right

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	All complaint responses explain where there has been a failure and the actions taken to rectify the failure.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Remedies are considered in line with the Housing Services Goodwill gesture policy as below:  <a href="https://www.havering.gov.uk/goodwill-gesture-discretionary-payment-policy-2021">Goodwill gesture discretionary payment policy 2021 (havering.gov.uk)</a>

			This is due to be reviewed in 2024 in line with the Ombudsman remedies policy.
<b>6.5</b>	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	All remedies offered are monitored to completion with the service.  Any monetary remedy offer is left open for 21 days. After the 21 days we will attempt to contact the customer via telephone twice and then if unsuccessful by written communication. If no response is received, we will write to advise that that complaint has been closed
<b>6.6</b>	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Any statutory payments cost incurred will be considered and re-imbursed where applicable

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>6.3</b>	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Any areas identified that will impact several residents is fed into the service to consider and implement any changes
<b>6.7</b>	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Any legal entitlement will be passed to the Council's legal team and the customer will be provided with the details of the legal team

### Section 7 - Continuous learning and improvement

#### Mandatory 'must' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	An annual report is provided throughout the Council, which includes complaints.  Following the implementation of the new policy and complaints management systems that came into effect on the 1st of December 2023, we will ensure this report is provided to all listed

#### **Best practice 'should' requirements**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	The Leader of the Council oversees complaints handling
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</li> </ul>	Yes	Following implementation of the new complaints management system and policy in December 2023, we will ensure all is included in future reports

	The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		
<b>7.5</b>	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Reports are provided to service areas as often as possible. With the new case management system, it is planned that the system will provide automatic reports that Managers can access themselves to implement training and service improvement, with the support of the complaint team
<b>7.6</b>	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	All officers have an objective set regarding case management and right first time.

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>8.1</b>	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	The code will be reviewed and publicised annually
<b>8.2</b>	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The self-assessment will be completed following a re-structure or change in procedures
<b>8.3</b>	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-</li> </ul>	Yes	This will be provided and publicised as listed.

	<p>assessment outcomes should be reported to elected members</p> <ul style="list-style-type: none"><li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li><li>• include the self-assessment in their annual report section on complaints handling performance</li></ul>		
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