

## Complaint handling code self-assessment – June 2024

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints policy, section 2, para 1 <a href="#">Corporate complaints policy</a>	We have adopted this definition in our approved complaints policy, apart from we refer to ‘organisation’ rather than ‘landlord’ as our policy covers all complaints made to us as a local authority.
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	Complaints policy, section 2, para 2 <a href="#">Corporate complaints policy</a>  Complaints policy, section 5, para 2 <a href="#">Corporate complaints policy</a>	Our residents do not have to use the word ‘complaint’ for it to be treated as such.  We process complaints received from third parties in line with our complaints policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 4, para 1, bullet point 2 <a href="#">Corporate complaints policy</a>  Webpage <a href="#">What is a complaint</a>	We recognise the difference between a service request and a complaint and set this out in our policy.  Our website describes what is not considered a complaint and provides links to make 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	Webpage <a href="#">What is a complaint</a>	Our website sets out some examples of what would be considered as a complaint, which includes not carrying out a service to an agreed standard or not responding to a service request within a stated timescale.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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 complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	N/A	We are aware of this requirement.  When we seek feedback on our services, we provide details of how to make a complaint.

## Section 2: Exclusions

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	Complaints policy, section 4, para 2 <a href="#">Corporate complaints policy</a>	We provide a detailed explanation if we do not accept a complaint, and the right to take our decision to the appropriate Ombudsman.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 4 <a href="#">Corporate complaints policy</a>	Our complaints policy sets out the exclusions, including where the complaint is made more than 12 months since the issue arose, and if the issue is subject to existing rights of appeal or legal remedy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 4 <a href="#">Corporate complaints policy</a>	We accept complaints if they have been made within 12 months of the issue occurring, unless excluded on other grounds.  If a complaint has been made outside of the 12 month period, discretion is applied where there are good reasons.
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	Complaints policy, section 4, para 2 <a href="#">Corporate complaints policy</a>	We provide a detailed explanation if we do not accept a complaint, and the right to take our decision to the appropriate Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy, section 4 <a href="#">Corporate complaints policy</a>	We do not take a blanket approach to excluding complaints.

### 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>Complaints policy, section 6 <a href="#">Corporate complaints policy</a></p> <p>Complaints policy, section 7 <a href="#">Corporate complaints policy</a></p> <p>Equality policy <a href="#">Equality, Diversity and Inclusion</a></p>	<p>We provide different channels to make a complaint.</p> <p>We take into account communication preferences and make reasonable adjustments in line with the Equality Act 2010.</p> <p>We have an approved equality, diversity and inclusion policy.</p>
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>Webpage <a href="#">How to make a complaint</a></p>	<p>Our website sets out the various ways to make a complaint.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	We are aware of this requirement.
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Our complaints policy is in a clear and accessible format, and is published on our website.  The policy details the two-stage complaint process, what will happen at each stage and the timeframes for responding.
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	Complaints policy, section 1, para 5, bullet point 1 <a href="#">Corporate complaints policy</a>  TLC magazine <a href="#">TLC magazine - Spring 2024</a>	Our policy sets out how it will be publicised.  Information about the Ombudsman was publicised in TLC magazine in Spring 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Webpage <a href="#">Complaining on behalf of others</a>	Our website sets out how someone can act on behalf of others in relation to a complaint.
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	Complaints policy, section 10 <a href="#">Corporate complaints policy</a>	Our policy includes links to the Ombudsman services websites.  We provide information on how to contact the relevant Ombudsman as part of our stage 2 response.



## 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	Complaints policy, section 8, <a href="#">Corporate complaints policy</a>	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>We have a designated customer experience lead who has responsibility for day-to-day monitoring of compliance with the complaints policy.</p> <p>This role is responsible for monitoring performance indicators and management information and reporting performance to key stakeholders.</p> <p>This role is responsible for liaison with both Ombudsman services.</p>

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	N/A	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>These officers have access to staff at all levels to facilitate the prompt resolution of complaints.</p> <p>These officers have the authority and autonomy to act to resolve disputes promptly and fairly.</p>

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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 core service and must be resourced to handle complaints effectively	Yes	N/A	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>We procure training on effective complaint handling from experienced Ombudsman staff.</p> <p>A quarterly meeting for housing and property services managers is held to review complaint handling and lessons learned.</p>

## 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	Complaints policy <a href="#">Corporate complaints policy</a>	We have a single policy in place for dealing with complaints.
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	We have a two-stage process and do not have extra named stages.
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	We have a two-stage process and do not have extra named stages.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Complaints handled by our repairs and maintenance contractor form part of our two-stage process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	Complaints handled by our repairs and maintenance contractor are in line with the Code.  The same training is provided to any third parties that handle our complaints.
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Complaints are acknowledged within 5 days of receipt.  The acknowledgement sets out our understanding of the complaint and the outcomes the resident is seeking.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	If we are not responsible for any aspects of the complaint, this is made clear in the acknowledgement.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol 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> </ol>	Yes	N/A	<p>Our complaint handlers are trained to deal with complaints in this way.</p> <p>The course is delivered by experienced Ombudsman staff and covers:</p> <ul style="list-style-type: none"> <li>• Defining and analysing complaints</li> <li>• Planning investigations</li> <li>• Making the best use of sources of information</li> <li>• Evaluating information and making sound decisions</li> <li>• Communicating decisions effectively</li> <li>• Resolving and learning from complaints.</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No	N/A	We do not routinely keep residents informed about their complaint if we are unable to fully respond within the timescale. This is on our action plan to improve during 2024-25.
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	Complaints policy, section 7 <a href="#">Corporate complaints policy</a>  Equality policy <a href="#">Equality, Diversity and Inclusion</a>	We take into account communication preferences and make reasonable adjustments in line with the Equality Act 2010.  We have an approved equality, diversity and inclusion policy.  We keep a record of any disabilities a resident has disclosed.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9.2, para 4 <a href="#">Corporate complaints policy</a>  Complaints policy, section 4 <a href="#">Corporate complaints policy</a>	If we decline to escalate a complaint through all stages of the complaints procedure, we advise in writing the reasons and confirm the right to approach the relevant Ombudsman about this decision.  Our reasons for declining to escalate a complaint are set out in the exclusions part of our policy.
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	N/A	A full record is kept of the complaint, all correspondence, relevant supporting documentation and the outcome.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 11 <a href="#">Corporate complaints policy</a>	Our policy sets out that complaints can be remedied at any stage of the complaint process.
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	Complaints policy, section 5, para 4 <a href="#">Corporate complaints policy</a>  Persistent complaints policy <a href="#">Persistent complaints, enquiries and unreasonable behaviour policy</a>	Our complaints policy refers to how we will manage unacceptable behaviour and unreasonable persistent complaints.  We have an approved policy for unreasonably persistent complainants which sets out the reasons for putting any restrictions in place and the review process.
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	Persistent complaints policy, section 3.3 <a href="#">Persistent complaints, enquiries and unreasonable behaviour policy</a>	Our persistent complaints policy sets out proportionate restrictions and how individual factors are considered when deciding an appropriate course of action.

## 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.	No	N/A	We do not currently have a process to prioritise complaints by the complexity of the complaint or by the residents personal circumstances. This is on our action plan to improve during 2024-25.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b>within five working days of the complaint being received.</b>	No	N/A	We do not acknowledge 100% of our complaints within 5 working days of receipt. This is on our action plan to improve during 2024-25.
6.3	Landlords must issue a full response to stage 1 complaints <b>within 10 working days</b> of the complaint being acknowledged.	No	N/A	We do not respond to 100% of our stage 1 complaints within 10 working days of receipt. This is on our action plan to improve during 2024-25.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	If an extension is needed to respond to a stage 1 complaint, an explanation will be provided and the extension will be for no more than 10 working days.
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	N/A	If an extension is needed to respond to a stage 1 complaint, the contact details of the relevant Ombudsman will be provided.
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	N/A	We respond to the complaint when the answer is known. If there are outstanding actions required to address the issue, these will be actioned promptly and appropriate updates given.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Our complaint handlers address all points in the complaint and provide clear reasons for any decisions, and reference policy, law and good practice where relevant.
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Additional complaints raised during a stage 1 investigation will be incorporated if they are related and the response has not been issued.  A new complaint will be logged if the stage 1 response has been issued, new issues are unrelated or if investigating the new issues would unreasonably delay the response.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	Complaints policy, section 9.1, para 3 <a href="#">Corporate complaints policy</a>	Our complaint handlers are trained to provide a full response that meets the expectations of the Code and is clear and uses plain language.

## Stage 2

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	We have a two-stage process with stage 2 being our final response.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No	N/A	We do not acknowledge 100% of our complaints within 5 working days of receipt. This is on our action plan to improve during 2024-25.
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	Complaints policy, section 9.2, para 3 <a href="#">Corporate complaints policy</a>	We do not require an explanation for escalating a complaint to stage 2.  We will set out our understanding of the issues as part of the acknowledgement.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy, section 9.2, para 3 <a href="#">Corporate complaints policy</a>	We appoint a different complaint handler to the person who considered the complaint at stage 1.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	No	N/A	We do not respond to 100% of our stage 2 complaints within 20 working days of receipt. This is on our action plan to improve during 2024-25.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	If an extension is needed to respond to a stage 2 complaint, an explanation will be provided and the extension will be for no more than 20 working days.
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	N/A	If an extension is needed to respond to a stage 2 complaint, the contact details of the relevant Ombudsman will be provided.
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	N/A	We respond to the complaint when the answer is known. If there are outstanding actions required to address the issue, these will be actioned promptly and appropriate updates given.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 <a href="#">Corporate complaints policy</a>	Our complaint handlers address all points in the complaint and provide clear reasons for any decisions, and reference policy, law and good practice where relevant.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 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; and</li> <li>• details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	Complaints policy, section 9.2, para 3 <a href="#">Corporate complaints policy</a>	Our complaint handlers are trained to provide a full response that meets the expectations of the Code and is clear and uses plain language.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints policy, section 9.2 <a href="#">Corporate complaints policy</a>	We have a two-stage process with stage 2 being our final response.  Heads of service are responsible for managing stage 2 complaints.

## 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> <li>• Providing a financial remedy; Changing policies, procedures or practices.</li> </ul>	Yes	Complaints policy, section 11 <a href="#">Corporate complaints policy</a>	<p>Our complaints policy sets out we will acknowledge when something has gone wrong and will take action to put things right.</p> <p>The Council does not, by default, offer compensation. We are responsible for public resources and any such decisions have to be carefully considered; compensation would usually only be provided where a complainant had suffered a genuine loss as a result of the Council's action and in most situations our focus is on offering a remedy to the situation.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy, section 11, para 2 <a href="#">Corporate complaints policy</a>	Where a remedy is offered, this remedy will be achievable, will be fair, and will reflect the extent of any service failures and the level of detriment caused to the complainant as a result.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	Complaints policy, section 11, para 2 <a href="#">Corporate complaints policy</a>	Where a remedy is offered, this will clearly set out what will happen and by when, and will be followed through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	N/A	We take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

## Section 8: Self-assessment, reporting and compliance

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>• the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>• 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>• any findings of non-compliance with this Code by the Ombudsman;</li> <li>• the service improvements made as a result of the learning from complaints;</li> <li>• any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<a href="#">Link to CPSI report</a>	We have produced a complaints performance and service improvement report for 2023-24.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No	N/A	Due to the general election being called, we are not able to present the annual report to our Cabinet by the due date of 30 June. The report will be presented at the next Cabinet meeting in July 2024 and their response will be published at that time.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	We are aware of this requirement.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We are aware of this requirement.
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	N/A	We are aware of this requirement.

## 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	N/A	We review every complaint to consider whether service improvements can be made as a result of learning from the complaint.
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	Complaints policy, section 1 <a href="#">Corporate complaints policy</a>	We take all complaints seriously and every complaint is seen as an opportunity for us to put things right, improve our services, and to provide vital intelligence on our performance, culture, and reputation.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<a href="#">Link to CPSI report</a>	We have produced a complaints performance and service improvement report for 2023-24, which includes learning and improvement from complaints.
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	N/A	Our Executive director of communities and housing is accountable for our 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	N/A	Our Portfolio holder for housing is our Member Responsible for Complaints.

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	N/A	Our Portfolio holder for housing is our Member Responsible for Complaints and will ensure our Cabinet members receive regular information on complaints.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>• regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance;</li> <li>• regular reviews of issues and trends arising from complaint handling;</li> <li>• regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings;</li> <li>• annual complaints performance and service improvement report.</li> </ul>	No	N/A	<p>Our Portfolio holder for housing is our Member Responsible for Complaints and will ensure our Cabinet members receive regular information on complaints.</p> <p>Due to the general election being called, we are not able to present the annual report to our Cabinet by the due date of 30 June. The report will be presented at the next Cabinet meeting in July 2024 and their response will be published at that time.</p>



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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>• 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; and</li> <li>• act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	No	N/A	We do not currently have a standard objective in relation to complaint handling but will implement this during 2024-25.