

## **Appendix A: Self-assessment form**

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.1	Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	<p>The complaint definition is outlined within the Council’s complaints policy and procedure.</p> <p>The Council are applying the new Housing Ombudsman Complaint Handling Code (April 2024) in full.</p>
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> <li>• Training materials have been shared with Heads of Service, Assistant Directors, Directors and Housing Staff following staff training.</li> </ul>	As per the complaint definition and the Council’s complaints policy and procedure, the word ‘complaint’ does not have to be used. Complaints from a third party or representative follow the same process. All Complaint Champions, including Housing staff, Heads of Service and Assistant Directors have been trained on the new Housing Ombudsman code.
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	Yes	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	As per the complaint definition and the Council’s complaints policy and procedure, the word ‘complaint’ does not have to be used. Complaints from a third party or representative follow the same process.

	handled in line with the landlord's complaints policy.			
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> <li>• Guidance around Service Requests vs Complaints</li> </ul>	<p>The Council's complaints policy and procedure sets out what is not considered as a complaint such as a service request, change or improvement.</p> <p>Within the process we use for Complaints, if a complaint is received and this is then converted to a service request, the complainant is notified of this conversion and given the reasons why.</p>
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> <li>• Guidance around Service Requests vs Complaints</li> </ul>	<p>As per the complaint definition and the Council's complaints policy and procedure, the word 'complaint' does not have to be used. The Council is keen to resolve disputes at the earliest possible opportunity and encourages customers to firstly approach the relevant service area, as we may be able to resolve the issue without it becoming a formal complaint.</p> <p>However, if the customer remains dissatisfied, the matter will then be logged as a complaint. Where a customer does not explicitly use the word complaint, this should not necessarily prevent the Council from identifying it as such.</p>
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though	Yes	<ul style="list-style-type: none"> <li>• Internal email issues to all relevant Heads of Service requesting</li> </ul>	All surveys that the Complaints team have access to have been updated to include details on how to make a

	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.		compliance in signposting to Housing Ombudsman	complaint. A council-wide email has been sent to ask every service area to update any surveys they send out.
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> <li>• Templates to be shared as evidence</li> </ul>	<p>The Council’s online Complaint form clearly advises what is and isn’t accepted as a complaint.</p> <p>If a complaint is received that falls outside of the complaints policy and procedure, the complainant is notified of this and given reasons why the complaint cannot be accepted as part of our existing policy. Examples of this include:</p> <ol style="list-style-type: none"> <li>1. A different local authority or organisation</li> <li>2. A duplicate complaint</li> <li>3. Customer has withdrawn complaint</li> </ol>

				There is also an ‘other’ option built into the internal process for the Complaint Champion to include reasoning why and to redirect to the relevant organisation, if applicable.
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	<p>As per the Council’s complaints policy and procedure – we can confirm that we have no time restrictions for our residents to make a complaint.</p> <p>We have also updated our policy to reflect areas of acceptable exclusion including any complaints surrounding court action and decisions previously being decided by the Ombudsman.</p> <p>We have also included cases where legal proceedings have already started and matters which we have previously considered under our policy.</p>
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.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	The Council does not impose a timeframe or limit for making a complaint.

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			
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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	The complainant will receive an explanation by either email or letter depending on which method they used to log their complaint. The Ombudsman's contact details are provided should the complainant want to take the decision further.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	As per the complaint definition and the Council's complaints policy all complaints will be treated individually where we will not operate a blanket approach.

### 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	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	As detailed in the complaints policy under the 'Equality and diversity' section the Council can accommodate reasonable adjustment requests in assisting the customer when logging their complaint. We have appointed a new Quality Assurance

	reasonable adjustments of residents who may need to access the complaints process.			The Quality Assurance Complaints Officer will support in documenting reasonable adjustment complaints.
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	<p>We have over 100 Complaint Champions across the council who have all been trained on the new Ombudsman Code.</p> <p>The Quality Assurance Complaints Officer is also available for call backs and reasonable adjustments.</p> <p>We have a dedicated intranet page for all staff guidance on the new code, including our policies and procedures.</p>
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes		The Council supports this statement.
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	The complaints policy and procedure are available on Ipswich Borough Council’s website which includes clear descriptions of stages and timeframes.

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	<ul style="list-style-type: none"> <li>• <a href="#">Housing Ombudsman webpage</a></li> </ul>	The Council has a dedicated webpage for the Housing Ombudsman Service and its contact information.
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> </ul>	As detailed in the complaints policy - Any individual representing or assisting a customer with a complaint can accompany them to any meeting with the Council if a meeting is required to consider the 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	<ul style="list-style-type: none"> <li>• Council's complaint process</li> </ul>	The resident is notified by either letter or email at Stage 1 of the complaints process with details on how to access the Housing Ombudsman throughout their complaint. Also, the extensions and responses at each stage reference how to contact the Housing Ombudsman.

#### 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	Yes	<ul style="list-style-type: none"> <li>• Council's complaint process</li> <li>• Complaints Policy</li> </ul>	We have recently appointed a Quality Assurance Complaints Officer who has oversight of the complaints process from



	<p>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.</p>		<ul style="list-style-type: none"> <li>• Complaints Procedure</li> <li>• Assignment of Quality Assurance Complaints Officer</li> <li>• Assignment of Assistant Director of Operations as “Senior Lead Person”</li> </ul>	<p>April 2024. The Assistant Director of Operations is our Senior Lead Person for Complaint Handling who will oversee the code.</p> <p>Housing has multiple teams of Complaint Champions assigned to each subject area within Housing to be able to handle complaints appropriately. Within the complaints handling system we have in-built reminders, escalations and reports that ensure complaints get the necessary attention and our timescales are being met.</p>
<p>4.2</p>	<p>The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Quality Assurance Complaints Officer Presentation</li> </ul>	<p>Our new Quality Assurance Complaints Officer’s role has the authority to act quickly bringing complaints to the attention of service areas speedily to provide a swift resolution for our residents.</p> <p>Our Assistant Director of Operations is the Senior Lead Person for Complaint Handling and will mediate to resolve issues in a timely manner.</p> <p>Our Complaint Champions also have the authority and autonomy to act to resolve disputes promptly and fairly.</p> <p>All of the above officers have full oversight of the internal complaints process to ensure prompt resolution is met.</p>

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	<ul style="list-style-type: none"> <li>Champion Stage 1 and Director Stage 2 user guide April 2024 report</li> </ul>	<p>Complaint Champions are all provided with training, guides, and videos to be able to handle complaints appropriately and fairly. The Quality Assurance Complaints Officer is taking a lead to ensure staff are using the Complaints system correctly. Training and Presentations have been provided to Housing Services in March and April. Training will also be given to our Surveyors, contractors and our newly formed Damp and Mould team in the coming weeks.</p> <p>Lessons learnt are recorded as part of each complaint response. We can report on this field and assign responsibility to service areas to ensure any outstanding actions are remedied. The Council has a culture of ensuring we get to the root cause of complaints and use the learnings to reduce the risk of recurrence.</p>
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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> <li>Complaints procedure</li> </ul>	As detailed in the complaint's procedure, the Council states: "You will be treated fairly and

	not be treated differently if they complain.			<p>courteously... your complaint will be treated in confidence".</p> <p>In line with the Equality Act 2010 and our support around reasonable adjustments, everyone is treated with respect. The Council has adopted the Ombudsman's approach around attitudes, respect and rights.</p>
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	<ul style="list-style-type: none"> <li>• Council's complaint process</li> <li>• Complaints procedure</li> </ul>	The Council has built a new two stage process effective from the 1st of April 2024. This is outlined in our procedure.
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	<ul style="list-style-type: none"> <li>• Council's complaint process</li> </ul>	The Council has built a new two stage process effective from the 1st of April 2024. This is outlined in our procedure.
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	N/A	All complaint handling is internal without involvement of third parties.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	All complaint handling is internal without involvement of 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	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> </ul>	<p>When we ask the complainant within the Complaints process for the details of their complaint, we also ask how they would like to see their complaint resolved.</p> <p>Within the Complaints process, we also have "case notes" that Complaint Champions use to record contact with the complainant, the relevant Ombudsman or third parties including emails, evidence and telephone calls. The Quality Assurance Complaints Officer may also make outbound contact to establish further information when required.</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	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> </ul>	The acknowledgement (via email or letter) includes the details of the original complaint and what happens next. Complaint Champions are trained to contact the complainant to clarify any areas that we are not responsible for or where details are not clear. The process has an additional function to capture aspects of the complaints the Council are not responsible for.

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	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> <li>• Complaints policy</li> </ul>	<p>The Council’s Complaint Champion training material covers this for all Champions and is reviewed by the Quality Assurance Complaints Officer.</p> <p>Complaints will be handled in accordance with the Council’s Complaints Policy and Complaints Procedure.</p> <p>The Council has nominated Complaint Champions in each service area who are responsible for complaint handling.</p> <p>Complaint Champions will:</p> <ul style="list-style-type: none"> <li>• Act sensitively and fairly</li> <li>• Be trained to receive complaints and deal with upset and distressed Customers.</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>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> </ul>	<p>Our system sends out reminders to our Complaint Champions at relevant and regular intervals of the Stage 1 process, asking if they require additional time to provide the response. The complainant is then notified of an extension. Reminders are also sent out daily at Stage 2 of our process.</p>
5.10	<p>Landlords must make reasonable adjustments for residents where</p>	Yes	<ul style="list-style-type: none"> <li>• Complaints policy</li> </ul>	<p>As detailed in the complaints policy under the ‘Equality and diversity’ section, the</p>

	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.			Council can accommodate reasonable adjustment requests in assisting the customer when logging their complaint. For example, by completing the complaint on behalf of the complainant or communicating responses by telephone. We also have a Council reasonable adjustment Policy which we must adhere to.
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	<ul style="list-style-type: none"> <li>• Council's complaints process</li> </ul>	The Council does not refuse to escalate a complaint. If the complaint was logged using the Council's online form then the complainant has access to escalate their complaint via their online account. If the escalation is received by letter it is sent to the internal complaints mailbox to be added to the process manually. The only exception is where we determined that the complaint is untrue.
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	<ul style="list-style-type: none"> <li>• Council's complaints process</li> </ul>	The Council's complaints process keeps a full audit trail of the complaint and any supporting documentation (case notes).
5.13	Landlords must have processes in place to ensure a complaint can be	Yes	<ul style="list-style-type: none"> <li>• Council's complaints process</li> </ul>	One of the mandatory fields within a complaint response is "details of any

	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.			remedies offered”. We also ask Complaint Champions to complete a reporting page which acts like a checklist to ensure that the appropriate remedies have been offered for example compensation.
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	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	<p>The management of unacceptable behaviour is covered in the Council’s complaint policy, as stated below:</p> <p><i>‘As part of the Council’s commitment to engage with the community and our customers the Council does not normally limit the amount of contact any customer may have with the Council through its councillors or its employees. However, a very small minority of customers’ own conduct can cause problems in certain circumstances, which can impact upon the provision of service to others or upon employees and councillors.’</i></p> <p>For example, some customers may contact persistently or unreasonably, or make unwarranted or unsubstantiated complaints or demands rather than genuinely seeking to resolve a grievance or other issues.</p> <p>The Council recognises that it is important to distinguish between people who make a number of complaints because they genuinely believe things have gone wrong on more than one occasion, and people who</p>

				<p>are simply being persistent. The Council acknowledges that complainants will often be frustrated and aggrieved if they have received a poor-quality service or where things have simply gone wrong, and as a consequence it is important that the Council recognises that the merits of their case should be considered, rather than just their attitude or behaviour.</p> <p>Any restrictions placed on a customer’s contact due to unacceptable behaviour will be appropriate to their needs and demonstrate regard for the provisions of the Equality Act 2010.</p> <p>All Council Tenants will also be subject to the terms and conditions of their Tenancy Agreement which relates to unacceptable behaviour.</p> <p>The Council is in the process of introducing a unified policy and procedure for managing unacceptable behaviour.</p>
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	<ul style="list-style-type: none"> <li>• Complaints policy</li> </ul>	<p>The management of unacceptable behaviour is covered in the Council’s complaint policy:</p> <p>All Council Tenants will also be subject to the terms and conditions of their Tenancy Agreement which relates to unacceptable behaviour.</p>



## 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	<ul style="list-style-type: none"> <li>Complaints procedure</li> </ul>	The Council's complaints procedure states that a full response will be completed within 10 working days from the date the complaint is acknowledged. If it is not possible to respond in this timeframe, the complainant will receive an explanation with the date that the response will be responded by, which will be no longer than an additional 10 working days.
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	<ul style="list-style-type: none"> <li>Complaints procedure</li> </ul>	The Council's complaints procedure states that the complaint will be acknowledged within five working days. Once a complaint has been raised in the official process, either an automated email will be issued as acknowledgement <i>or</i> a letter will be issued in cases where the complainant is not able to receive electronic correspondence.
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	<ul style="list-style-type: none"> <li>Complaints procedure</li> </ul>	The Council's complaints procedure states that a full response will be completed within 10 working days from the date the complaint is acknowledged. If it is not possible to respond in this timeframe the complainant

				will receive an explanation with the date that the response will be responded by, which will be no longer than an additional 10 working days.
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	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	The Council’s Complaint Champion training material covers this and our complaints policy and procedure.
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	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	The complainant is sent the Housing Ombudsman’s contact details as part of extension request to the complainant.
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	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	Our internal Complaint Champions training, which is mandatory for all Housing Complaints Champions, covers this.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> </ul>	The Council’s Complaint Champion training material covers this. The Quality Assurance Complaints Officer also reviews complaints

	referencing the relevant policy, law and good practice where appropriate.			to ensure they comply with the Code and any other applicable laws or policies.
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	<ul style="list-style-type: none"> <li>Council’s complaint process</li> </ul>	We enable a complaint to be closed as a "duplicate" within our process, ensuring the complainant is then contacted to advise that we have received their further contact and that it will be addressed in the final Stage 1 or 2 response.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol 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 stage 2 if the individual is not satisfied with the response.</li> </ol>	Yes	<ul style="list-style-type: none"> <li>Council’s complaint process</li> </ul>	The list of requirements is built into the response templates for all email and letter response made at Stage 1 and Stage 2.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	<p>If the complainant has complained online, they have instant access to escalate their complaint to the next stage once their response has been submitted. If the complainant escalates their complaint using another method, then this is forwarded and attached to the system.</p> <p>The Quality Assurance Complaints Officer is also responsible for ensuring all elements of the resident's complaint are addressed and responded to fully.</p>
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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	Escalation is built into the process. The escalation acknowledgement includes the details of the original complaint, the reason to escalate where provided and what happens next. Communication would be carried out between the landlord and the complainant if further clarification was required.
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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	The resident can escalate their complaint to Stage 2 once their Stage 1 response has been completed without reasons, as this is not a mandatory field, and further contact will be made to gain a full understanding when required.

				Staff have been reminded not to ask the resident to set out their reasons for escalation to Stage 2 as we should make effort to understand their reasons for escalation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<ul style="list-style-type: none"> <li>Council’s complaint process</li> </ul>	There are multiple Complaint Champions for each service area who draft the complaint, and this is signed off by the Assistant Director once it has been approved by both the Quality Assurance Complaints Officer and the Head of Service. If a complaint is escalated to Stage 2, a Director drafts/approves the response, it is then signed by the Chief Executive who has not been involved at Stage 1 and is independent of the process.
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	<ul style="list-style-type: none"> <li>Complaints procedure</li> </ul>	The Council’s complaints procedure states that a full response will be completed within 20 working days from the date the complaint escalation is acknowledged. If it is not possible to respond in this timeframe, the complainant will receive an explanation with the date that the response will be responded by, which will be no longer than an additional 20 working days.
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	Yes	<ul style="list-style-type: none"> <li>Complaints procedure</li> </ul>	The Council’s complaints procedure states that a full response will be completed within 20 working days from the date the complaint escalation is acknowledged. If it is not

	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.			possible to respond in this timeframe, the complainant will receive an explanation with the date that the response will be responded by, which will be no longer than an additional 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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	The complainant is sent the Housing Ombudsman's contact details as part of extension request to the complainant.
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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	Our internal Complaint Champion training, which is mandatory for all Housing Complaints Champions, covers this. Outstanding actions are also tracked and logged by our Quality Assurance Complaints Officer, and these are reviewed regularly and reported on.
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	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	The Council's Complaint Champion training material covers this for all Champions and is reviewed by the Quality Assurance Complaints Officer.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ol 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> </ol>	Yes	<ul style="list-style-type: none"> <li>Council's complaint process</li> </ul>	The list of requirements is built into the response templates for all email and letter response made at Stage 1 and Stage 2.

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	<p>Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> </ul>	<p>The process ensures all suitable staff members are part of the process, with overarching sign off by our Chief Executive.</p>

**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> </ul>	Yes	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> </ul>	<p>We have built this into responses for all email and letter response made at Stage 1 and Stage 2. The list of requirements is also visible within the process to remind Complaint Champions of Ombudsman expectations in their response to the complainant.</p> <p>The Council agrees to actively learn through answering "lessons learnt", a section built into the Complaints process, where</p>

	<ul style="list-style-type: none"> <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>			Champions and relevant senior officers will then identify areas of improvement. This data is then collated and reported. Case studies are also being collected and shared by the Quality Assurance Complaints Officer to show real-time learning.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<ul style="list-style-type: none"> <li>• Compensation Policy</li> </ul>	Housing Services has a <a href="#">Compensations Policy</a> .
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	<ul style="list-style-type: none"> <li>• Compensation Policy</li> </ul>	Any remedies offer include the amount agreed with the complainant, the date the remedy is due by and the method in which this will be delivered. This is outlined in the Compensation policy.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy</li> </ul>	The Council agrees to take into account any guidance offered by the Ombudsman.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service	Yes	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	The Council has produced our Annual Complaint and Service Improvement Report, reflective of the period 2023-24.



	<p>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>			<p>Additionally, the Council produces monthly and quarterly complaint reports which include volumes, categories, lessons learnt, complaint summaries and outcomes.</p> <p>The reports are sent internally to the Corporate Management Team, Senior Lead Person, and the Member Responsible for Complaints (MRC) to review and to take any appropriate actions.</p>
8.2	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	<p>The annual complaints performance and service improvement report has been published on our website alongside the governing body’s response.</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> <li>Complaints procedure</li> </ul>	The Council agrees, as per this Self-Assessment document, to carry out a new Self-Assessment should any significant changes occur. Any assessments will be published <a href="#">online</a> .
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<ul style="list-style-type: none"> <li>Self-Assessment</li> </ul>	The Council understands and agrees to self-assess when asked by the Ombudsman.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	<ul style="list-style-type: none"> <li>Self-Assessment</li> </ul>	The Council understands and agrees to inform the Ombudsman, provide information to affected residents and publish outcome on website in the event of an exceptional circumstance leaving us unable to comply with the code. This will include a timescale with estimates on when we can comply again 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	<ul style="list-style-type: none"> <li>Council's complaint process</li> <li>Reporting</li> </ul>	The Council agrees to actively learn through answering "lessons learnt", a section built into the Complaints process, where Champions and relevant senior officers will then identify areas of improvement. This data is then collated and reported. Case studies are also being collected and shared

				by the Quality Assurance Complaints Officer to show real-time learning.
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	<ul style="list-style-type: none"> <li>Reporting</li> </ul>	<p>The Council agrees to collate and report data from Complaints as a source of intelligence. Currently, information is supplied to our Housing Services, which contains reporting details of any complaint received and its outcomes. This will also be provided to the Corporate Management Team Quarterly, with data and case studies being presented by the Quality Assurance Complaints Officer.</p> <p>Lessons learnt workshops will be set up to review and provide feedback on any service failings, in turn then being able to feedback to our complainants and build stronger relationships with our residents.</p>
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	<ul style="list-style-type: none"> <li>Reporting</li> </ul>	<p>The Council agrees, as above, to be accountable and transparent to ensure a positive complaint handling culture. This wider learning and improvement will continue to be shared with stakeholders.</p> <p>The Council agrees to actively learn through answering "lessons learnt", a section built into the Complaints process, where Champions and relevant seniors will then identify areas of improvement. This data is then collated and reported. Case studies are also being collected and shared by the</p>

				Quality Assurance Complaints Officer to show real-time learning.
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	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	The Council has appointed a "suitably Senior Lead Person", Assistant Director of Operations.
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	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	The Council has appointed a Member Responsible for Complaints (MRC), the Portfolio Holder for Culture and Customers. This member will oversee the Ombudsman Codes to support a positive complaint handling culture.
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	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	The Council acknowledges this. The MRC has access to suitable information and staff to perform their duties.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ol style="list-style-type: none"> <li>regular updates on the volume, categories and outcomes of complaints,</li> </ol>	Yes	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	The MRC is privy to all the mentioned and required information, and liaises closely the Senior Lead Person, Assistant Director of Operations.

	<p>alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			<p>Regular updates are held with the MRC to discuss complaints, volumes, trends and improvement plans.</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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<ul style="list-style-type: none"> <li>• Council’s complaint process</li> <li>• Complaints policy</li> <li>• Complaints procedure</li> </ul>	<p>The Council has built a new 2-Stage Complaints Handling Process effective from April 2024, meeting the requirements of the code. This ensures a consistent process cross-Council. We also have user guides, training videos, and regular meetings to ensure our approach is unified and collaborative. The Council also acknowledges collective responsibility, challenges blame culture and adheres stringently to our Policy and Procedures.</p>