

Appendix A – 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	<p>A complaint must be defined as:</p> <p><i>‘An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’</i></p>	YES	<p>Hammersmith and Fulham Council has a formal complaints policy which covers corporate complaints and complaints relating to Adult Social Care and Children’s Services. The complaints policy can be found here Corporate Complaints Policy for Adults’ Services, Children’s Services and Formal Corporate Complaints May 2020 (lbhf.gov.uk)</p> <p>The policy is reviewed every three years, or sooner if there is a relevant change. This was last reviewed in December 2022 following our most recent self-assessment.</p> <p>The policy includes the following wording to define a complaint:</p> <p>“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by our organisation, our staff, or those acting on our behalf, affecting an individual resident or group of residents.”</p>

			<p>A complaint submitted via a third party or representative will still be handled in line with our complaints policy.</p> <p>We will always manage expectations from the outset being clear where the desired outcome is unreasonable or unrealistic.</p>
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.	YES	<p>Complaints are accepted as a formal complaint even if the word 'complaint' is not used. They can be made via all channels including verbally on a call, face to face, online, by email and in any written communication.</p> <p>(Complaints Policy, pages 16 & 17 and Formal corporate complaints LBHF (London Borough of Hammersmith & Fulham) (London Borough of Hammersmith & Fulham) (London Borough of Hammersmith & Fulham))</p>
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.	YES	<p>We accept complaints from a third party and record this within the complaints handling system. These complaints are handled in the same way as complaints directly from a resident. (Complaints Policy, page 17)</p> <p>All complaints are logged via our case management system and assigned to an officer who will make further enquiries to investigate the complaint.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	YES	<p>Complaints are only refused by exception and for the reasons specified in the policy such as that the complaint is over 6 months old.</p> <p>We will always provide a detailed explanation setting out the reasons why the matter is not suitable for our complaints process and the right to escalate to the Housing Ombudsman.</p> <p>(Complaints Policy, page 10).</p>

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.	YES	Our Complaints Policy details reasons that a complaint will not be considered. This includes where the complaint should be covered by another process (Complaints Policy, page 14 & 15).
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.	YES	Where a complaint is refused the response to the resident gives the reasons why and will give details of the route to take this to the Ombudsman.

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 service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	YES	A complaint could be identified by triaging a service request. An explanation of the difference between a service request and a complaint is included in our policy. (Complaints Policy, page 14)
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.	YES	If a comment in a survey constituted a complaint, we would refer the resident to the complaints process or the relevant process.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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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	As mentioned, and evidenced in section one, the Council has a broad range of access channels available to make a complaint. This includes our 'Contact us' web page which allows customers to make a complaint in different ways.
2.3	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.	YES	The policy is published on our website and can be made available in other formats if requested. The website itself can be translated into other languages and offers a read aloud facility which can be used while browsing the complaints web pages, but this does not apply to linked documents such as the policy. Our website includes a page with information on accessibility and information on how residents can get support with accessibility of our website and our services. Accessibility statement LBHF
2.4	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.	YES	The website includes dedicated pages relating to complaints Complaints and compliments LBHF This is accessible directly from our home page. LBHF London Borough of Hammersmith & Fulham LBHF.
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	In compliance with the Equalities Act, we adapt our procedures and policies to meet resident's needs and put in place reasonable adjustments. We ask about specific needs/ requirements on our self-service request form. Contact centres that fill out this self-service request form over the phone on behalf of residents also capture these needs. The completion of this information then enables an alert to be generated on the system for officers viewing the case. Home visits are arranged through our Tenancy Management Team where required. Safeguarding

		<p>processes are followed as appropriate and the Resident Experience Team liaise with relevant departments such as Adult Social Care and Children’s Services.</p> <p>All housing staff have been briefed through a guidance note issued in March 2023, reminding them to record housing vulnerabilities on the housing system (Northgate). The briefing also included guidance on</p> <ul style="list-style-type: none"> • Learning from complaints and complaint escalation • Impact on residents’ wellbeing • Poor customer experience • Potential breach of equalities legislation • Impact on the Housing Revenue Account <p>Staff delivering services and complaint handlers are reminded to check the relevant sections on the housing system to ensure services delivered consider any recorded vulnerabilities. In addition, consideration is given to the training needs of staff through complaint investigations and feedback.</p> <p>Other live projects delivering improvements to the way we record, use, and respond to residents with vulnerabilities include:</p> <ul style="list-style-type: none"> • Knowing our Residents project meetings, which includes a focus on how we record and use vulnerability data. • Updating the Council’s Vulnerability Policy for housing concluded in August 2022, which includes reviewing the use of the terms vulnerability and vulnerable, process mapping resident journeys and the impact on the service offer for customers flagged as vulnerable. Processes relating to this
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			<p>are currently being reviewed again to ensure that they are in-line with best practice.</p> <ul style="list-style-type: none"> • Reviewing where vulnerability information is flagged on the housing system, integration of data streams from Housing, Adult Social Care and Public Health. • Identifying the statutory policy and partnership working context for the use of vulnerable flags for example working with Adult Social Care.
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	We publicise online on our website and through publications. We have developed a poster that gives details on how to make a complaint, how to contact the Ombudsman and details of the Complaint Handling Code. We are displaying the poster on noticeboards across the estates and have it on our online noticeboard on the Get involved Hub - Talk To Us – LBHF Get Involved The engagement team is also taking the opportunity to cascade this information at various resident community events they attend.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	YES	The complaints policy is included in acknowledgement letters/emails and formal responses, online and included in newsletters and other mailouts throughout the year.
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 on the resident's right to contact the Ombudsman service is provided throughout the resident's complaint. Details are included in the acknowledgement to the complaint and in the templates for complaint responses. Officers are instructed to include this information in interim complaint correspondence, for example when contacting residents to advise on extended timescales.

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.	YES	We do not promote social media as an effective mechanism to lodge complaints. However, we do get comments on social media that could be defined as complaints. If this happens the relevant details are passed to the service who will contact the resident directly to follow up. We do not engage in relation to specific cases via social media. This is referred to in our policy (<i>Complaints Policy, page 17</i>)

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	<p>The Council has a central team, the Resident Experience Team, that coordinate and report on complaint responses across the Council. All complaints come into this team and are allocated to the relevant departments for response. The team is part of Resident Services and is independent from Housing. The Ombudsman Link Officer is also part of this team and coordinates responses to the Ombudsman from relevant departments.</p> <p>A dedicated team has been established in housing, called the Dispute Resolution Team. This team work closely with the central Resident Experience Team to ensure complaints on housing matters are fully investigated and resolved and organisational learning captured.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	YES	As mentioned above our structure ensures no conflict of interest. All complaint handling staff are required to complete the Ombudsman on-line training and all the Resident Experience Team and Dispute Resolution Team

			<p>in Housing have completed this and provided their certificates to management. A training session was carried out at a Managers Forum in February 22 promoting this training so that managers across the Council can encourage their officers to attend in addition to dedicated complaints handling staff.</p> <p>Complaint handling is included in Corporate Induction training and Resident Experience Training across the Council. Further training and guidance for staff and managers is being developed and implementation will be aligned with the new joint complaint handling code and any amendments to our policy.</p>
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	YES	Recent training and quality assurance have supported improvement in this area.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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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 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 within five days of receipt .	YES	Our Complaint's Policy does not include a stage 0 or pre-complaint stage. Our target for logging and acknowledging complaints is 2 working days and we are achieving this. We have completed analysis on this, and the majority are acknowledged on the same or next day.
4.2	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.	YES	We are including a summary of the complaint in our acknowledgements. Where complaints are unclear, the Resident Experience Team/Dispute Resolution Team will contact the complainant. For all stage 2 complaints, the investigating officer makes contact with the complainant to discuss the complaint, communications preferences, and any outcomes they are seeking.
4.6	A complaint investigation must be conducted in an impartial manner.	YES	As mentioned in section 3 complaints relating to Housing are investigated and responded to by dedicated teams either within the Housing service (Dispute Resolution Team) or outside (Resident Experience Team). This ensures independence from the service delivery teams. The changes to structure will maintain this impartiality.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	YES	Our case management system includes all details on each case at every stage and contains a full audit trail. We implemented a new system in June 2021 and migrated data over to this system. The new system enables much more comprehensive record keeping. There is permission-based access structure and so confidentiality and security are maintained, and officers only have access to those cases relevant to their role.

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	YES	<p>An area of improvement focus for us has been our communication with residents. To address this and to ensure that we are communicating with residents from the earliest possible stage, officers within Housing and within the Resident Experience Team are contacting residents by phone on receipt of their complaint (stage one and stage two), so they can ensure that they understand the reason for the resident's complaint, communications preferences and what the resident requires in terms of resolution.</p> <p>We are working with residents to agree a feedback mechanism and frequency on receipt of the case. Officers have been instructed to record details of all communication with the resident and with other officers on the case management system.</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"> • set out their position • comment on any adverse findings before a final decision is made. 	YES	In addition to improving ongoing communication with our residents, we have also amended our complaint response templates to give the opportunity for the resident to come back to the complaint handler if they feel that anything has been missed or is inaccurate in the response without requiring them to escalate to the next stage.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	YES	Residents are given 20 working days to escalate complaints from stage one to stage two and this is referred to in our policy. (Complaints Policy, page 12)
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 landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	YES	There are very few cases where escalation is refused and if we do the resident is advised of the reason. Our Complaints Policy details reasons that a complaint will not be considered. This includes where the complaint should be covered by another process (Complaints Policy, page 14 & 15).

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	<p>Our case management system includes all details on each case at every stage and contains a full audit trail. We implemented a new system in June 2021 and migrated data over to this system. The new system enables much more comprehensive record keeping.</p> <p>All records of complaints are logged on our systems and original documents are files in our electronic document management systems. Any reviews, outcomes or other relevant correspondence relating to the complaints are also logged and recorded against the cases.</p>
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	<p>We have a policy to deal with unacceptable behaviour from residents in pursuing complaints and this is published on our website. We use this policy when appropriate. Restrictions are time-limited and reviewed. We are currently reviewing the process supporting this policy to ensure that it links with policies in respect of employee and elected member health and safety. Hammersmith & Fulham Council Unreasonable or Vexatious Behaviour Policy April 2020 (lbhf.gov.uk)</p>

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	<p>This would be addressed in the triage process when telephoning the resident and acknowledged in complaint responses.</p> <p>As part of our improvement process, we will aim to contact the resident within 2 working days of the complaint being logged to talk through the complaint and agree the desired outcome</p>

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	This is an area of focus for us and an area where we have delivered improvements. We aim to resolve the complaint at the earliest opportunity, and we have increased the number of complaints resolved at stage one and not escalating to stage two. We have experienced delays in response times in the past and we are addressing these and improving. We do have some complaints that take a long time to deliver full resolution due to the complexity of work involved but we are now closing these with an agreed schedule of work and monitoring this for delivery.
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	Opportunity is available and we would ensure consent confirmed in writing and Power of Attorney provided if applicable
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	We involve our Legal Team in such matters to ensure that this is covered
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	YES	We have delivered this instruction to our teams and addressed in training and are monitoring as part of quality assurance to ensure compliance.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	YES	This has been an area of focus for us, and we are communicating regularly with our residents on complaints including sending holding responses and agreeing with residents when we need to extend the timescale in line with the code.
4.16	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.	Yes	We have recently implemented in November 2023 satisfaction and feedback surveys in relation to complaint handling for stage 1 and stage 2 complaints.
4.17	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	YES	Learning from complaints is a key focus for the Council and reasons from complaints are informing the Housing Improvement Plan. A wide group of staff from across the Council have been involved in supporting the service improvement and learning from complaints.

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	Comprehensive policy in place and restrictions are applied only where appropriate and reviewed regularly.

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 <u>within 10 working days</u> 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	<p>Following our self-assessment, completed in September 2022, we amended the policy to reflect the requirements of the Complaint Handling Code and the timescale is now 10 working days from receipt. This was amended in December, so it commenced from the start of quarter four. (<i>Complaint Policy, page 11</i>).</p> <p>As Housing Ombudsman determinations have identified, we have experienced delays with dealing with stage one complaints in respect of Repairs cases. This has been a key area of focus for us and at the end of July 91% of stage one complaints were responded to on time. Where a response could not be sent within the 10 days an extension of up to 10 days is applied but this is only where this is communicated with the resident. If a response cannot be determined within this period, then a further timescale will be agreed with the resident. As of the 1st October 2023 we have no stage 1 complaints overdue.</p> <p>We monitor this extremely closely through our system and all Housing services receive a report daily to identify</p>

			<p>cases that are overdue or are becoming overdue. Other services in the council receive this weekly.</p> <p>We report performance on the timeliness of complaint handling monthly to all services and their management and Strategic Directors and at the end of every quarter a report goes to our Strategic Leadership Team (SLT) Assurance meeting.</p>
5.5	<p>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.</p>	YES	<p>Responses to Repairs complaints are sent within the agreed timescales and we share a plan of action once it is agreed with the resident. We continue to monitor any outstanding actions with the case officer being the single point of contact.</p> <p>Stage 2 cases with works outstanding are monitored by a closed stage 2 team through to completion. Residents have a named contact in the closed stage 2 team and contact is made within 5 working days. All stage 2 repair works are signed off by a surveyor.</p>
5.6	<p>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.</p>	YES	<p>We have templates set up in our case management system that guide and prompt officers to ensure that all areas specified in the code are addressed.</p> <p>Stage one responses are reviewed by a senior officer before they are issued to ensure quality and to ensure that all the issues are addressed.</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	YES	<p>We have templates set up in our case management system that guide officers through each of the six stages to ensure that all areas specified in the code are addressed.</p> <p>Stage one responses are reviewed by a senior officer before they are issued to ensure quality and to ensure that all the issues are addressed. Feedback and regular training are now given to all officers.</p>

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	If we refuse escalation to stage two, we clearly communicate the reasons that the exclusion ground applies when we decline to escalate the complaint. There are very few that are excluded. We include the Housing Ombudsman details in the refusal letter.
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	Our acknowledgement of all stage 2 complaints includes a summary of the issues and outcomes they are seeking. All stage 2 escalations are contacted by phone so that the scope of the complaint, communications preferences and the outcomes sought can be clarified.
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	The resident is given the opportunity to escalate following the response to the stage one complaint
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 complaints are dealt with by a different officer than stage one complaints. These have been dealt with by our Resident Experience Team previously, but we are currently amending the structure for complaints handling and the stage two complaints will be dealt with in the service to enable less double handling and more capacity to ensure the complaint and associated repairs are managed closely until the resident is completely satisfied. Stage two complaints will still be dealt with by a separate team to the service delivery teams to maintain independence.

<p>5.13</p>	<p>Landlords must respond to the stage two complaint <u>within 20 working days</u> 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.</p>	<p>YES</p>	<p>Our complaints policy gives a timescale of 20 working days to respond to a stage two complaint. (<i>Complaint Policy, page 11</i>).</p> <p>We monitor response timescales extremely closely through our system and all Housing services receive a report daily to identify cases that are overdue or are becoming overdue. Other services in the council receive this weekly.</p> <p>We have set up a Housing Dispute Resolution Team and our process is designed to resolve complaints within the relevant timescales.</p> <p>As with stage one complaints, we report performance on the timeliness of complaint handling monthly to all services and their management and Strategic Directors and at the end of every quarter a report goes to our Strategic Leadership Team (SLT) Assurance meeting.</p>
<p>5.16</p>	<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"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	<p>YES</p>	<p>Our system has a template for stage 2 complaints, and this includes all areas required as specified in the code. This prompts officers to include the relevant information. All stage two response are checked for quality assurance prior to issuing.</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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.	YES	We do not have a third stage to our complaints 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">• the complaint stage• the complaint definition• the decision on the complaint• the reasons for any decisions made• the details of any remedy offered to put things right• details of any outstanding actions• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	N/A	Not applicable

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	For any cases where we are unable to resolve within 10 working days or a subsequent 10-day extension, we are in communication with the resident to agree the timescales and to keep them updated on actions taken

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	Where agreement cannot be reached, we will provide the Housing Ombudsman contact details so the resident can challenge our plan and proposed timescales.
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	The housing and complaints team will always look to see what historical and relevant information is on the system to identify if it is a repeat problem and include this in the case file if it will help to resolve the case.
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	As part of our procedures - we will always look to be efficient in providing response to complaints by aligning and bringing together all related complaints into a one comprehensive response. Where this is not possible and will cause significant delay – a new complaint will be logged

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	For any cases where we are unable to resolve within 10 working days or a subsequent 10-day extension, we are in communication with the resident to agree the timescales and to keep them updated on actions taken
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	Housing Ombudsman contact details are provided in all letters about complaints

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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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 within 20 working days 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.	YES	We do not have a third stage. The Dispute, Support and Resolution Team are able to review closed cases at stage 2. This ensures that cases closed with a resolution being tracked can have a review on the current position and resolution where appropriate.
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.	YES	Housing Ombudsman contact details are provided in all letters about complaints.

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	We have set up a Dispute Resolution Team and our process is designed to resolve complaints. Where we get things wrong, we do apologise, often face to face, and offer compensation and seek to quickly rectify the issues working with the resident to agree outcomes. The team then track that through to completion
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	We have guidelines in place on compensation and remedies following Ombudsman recommendations. We also cover this in training and use responsibilities under the tenancy agreement as a guide.
6.5	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	In most cases complaints are in respect of repairs and our responses will include appointments or in some cases a schedule of works which will give details of timescales. We have made significant improvements in following up on repairs after closure of the stage two complaints. In February 2023 we created a new team to

			do this. When a complaint is closed, it is passed to this team and the resident is advised that an officer will contact them in five working days. The resident then receives a call from their point of contact and this person monitors the repair position and maintains regular contact with the resident and the contractor to ensure completion. On completion of the repair a surveyor who is linked to this new team will carry out a post repair inspection so we can be sure that everything has been concluded and the resident is fully satisfied. This approach is having a positive impact and will deliver improvements for our residents.
6.6	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	Included in our compensation policy and follow Ombudsman guidelines on compensation

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	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	We have gained significant learning from our complaints which we have used to inform our Housing Service Improvement Plan
6.7	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	We work closely with our Legal Team

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	<p>Information on performance in terms of timeliness and the number of complaints upheld is reported to services monthly and reported to Strategic Leadership Team (SLT) quarterly. Quarterly performance in respect of Ombudsman cases is provided to SLT and they also receive reports on the annual performance data and the annual letter from the Local Government and Social Care Ombudsman.</p> <p>Complaint handling is reported to members quarterly as part of our performance reporting (Evidence 7.2 Quarterly performance report to PC (Political Cabinet)). An annual report on ombudsman performance went to Audit Committee in September 2022 which included the LGSCO (Local Government and Social Care Ombudsman) annual letter and information on Housing Ombudsman maladministration findings. In addition, In February 23 the Housing Ombudsman annual data was reported. A further report on the Housing Ombudsman Annual final report will be shared wider internally in Q3 23/24.</p> <p>A performance dashboard of key housing indicators including complaint data is being developed jointly with the Housing Representatives forum. This is being considered by our Divisional Management Team and we are hoping this will be signed off when ready. This information will be in addition to the Tenant Satisfaction Surveys (TSM) that we are obliged to submit from April 2024 as part of the Social Housing Act requirements. The TSM (Tenant Satisfaction Measures) requires data on complaints as well. With regards to the lessons learnt and improvements, this will be now</p>

			captured as part of the Director's update report which is now a standard item at Representatives Forum meetings as well. Jointly with the resident group we are reviewing their Forward Plan - and have included an annual report – which will incorporate feedback on complaints and lessons learnt. We are also looking how all this information can also be cascaded to the smaller TRA's that currently exist.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	We have a member of our Strategic Leadership Team who is responsible for complaints across the Council and a lead member for complaints but given the focus on Housing complaints the Lead Member for Housing has been heavily involved in complaints performance
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • 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. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	YES	See response to 7.2

7.5	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	<p>To promote a positive complaint handling culture, ongoing training and coaching is provided to complaint handlers, for all stages of complaints. In March 2022, all customer service advisors were re-trained. An aspect of that training included in-depth needs analysis with improved repair diagnostic questions and an emphasis on the importance of recording in-depth repair job descriptions. Additional training has been delivered in July 2023 on the following: -</p> <ul style="list-style-type: none"> • The importance of communicating with residents, focusing on honesty, openness, and transparency. • Identifying vulnerabilities and flagging them so they can be acted upon, to the whole of the Resident Experience Team. • Professional and consistent recording keeping, and updates provide an auditable trail of the case being handled. • Supporting our advisors on ‘how to manage challenging calls with confidence’ and ‘empathy’ training. • How to use and maintain the data on our housing management system, to ensure that the data we hold on to our residents/repairs is clean, up-to-date and fit-for-purpose. <p>A Housing Ombudsman learning course, which was completed by Stage 2 Investigation Officers in September 2022. This was completed by the whole of the Resident Experience Team by 31 May 2023.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. • take collective responsibility for any shortfalls identified through complaints rather than blaming others. 	YES	<p>Our revised performance management framework monitors complaints handling. In addition, as part of our revised performance management arrangements we will be embedding a culture where teams have an objective to improve our customers experience with specific attention on management of complaints. As part of the Service Improvement plan, we are working</p>

	<ul style="list-style-type: none"> act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 		<p>collaboratively towards resolving complaints, working with colleagues across teams and departments. We are solution focussed and regularly share lessons learnt through complaints so colleagues can learn from mistakes rather than blaming others. The Professional Standards for engaging with complaints as set by the Chartered Institute of Housing form part of our training plan.</p>
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	YES	<p>The Council completed a self- assessment against the updated code in September 2022 and then revised this in December 2022 following delivery of action to ensure further compliance.</p> <p>A further review of this self-assessment was completed in September 2023. We plan to publish this on our website in quarter 3.</p> <p>The self-assessment prior to this one was reported to Cabinet in February 2023 and also referred to and a link included in our Annual Governance Statement.</p>
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	YES	This reviewed self-assessment is in response to changes that have been made.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self- 	YES	Following this review and the completion of work on restructuring the Housing Service and the approach to

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