

## Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
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| 1.2            | <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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p> | Yes              | (A link to the policy will be added before publication) | <p>The revised policy aligns with the new definition.</p> <p><b>Updated policy</b><br/> <i>A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, and/or the landlord its own staff, or those acting on its behalf, affecting a resident or group of residents</i></p> <p>Consultation with the tenant consultive group was undertaken May 2024 and the amended policy approved by Cabinet August 2024.</p> |
| 1.3            | <p>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</p>                          | Yes              | (A link to the policy will be added before publication) | <p>The Councils Comments, Compliments, and Complaints policy now explicitly acknowledges that a customer does not have to use the word “complaint” for it to be treated as such.</p> <p>The council accepts complaints from third parties, this is detailed in the policy</p> <p>This being further strengthened across the wider organisation with any identified training.</p>  |

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|     | representative must be 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 | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy.</p> <p>Service requests submitted and identified through the complaints process are recorded, acknowledged and forward to the relevant team for review and response. The Information Governance monitor through to completion.</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 | (A link to the policy will be added before publication) | The Councils Comments, Compliments, and Complaints Policy outlines our approach in this regard.   |
| 1.6 | An expression of dissatisfaction with  | Yes | (A link to the policy will be added before publication) | This is identified and reflected in the updated policy  |

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|  | <p>services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p> |  |  | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy.</p> <p>Where we ask residents to complete surveys – for example, after major maintenance or improvement works have been carried out. Any dissatisfaction expressed through these surveys would not be defined as a complaint although we will make you aware of how you can pursue a complaint if you want to.</p> |
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**Section 2: Exclusions**

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation   |
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| 2.1            | <p>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</p> | Yes              | (A link to the policy will be added before publication) | <p>Exclusions are detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>If there are valid reasons for not accepting a complaint, we write to the customer explaining why this is the case.</p> <p>If an issue is being reported for the 1st time, then it may be considered as a request for service rather than a complaint, this is detailed in the policy.</p> |
| 2.2            | <p>A complaints policy must set out the circumstances in which</p>   | Yes              | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p>  |

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|     | <p>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> |     |   |  |
| 2.3 | <p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must</p>  | Yes | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy |

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|     | 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 | (A link to the policy will be added before publication) | Complainants are advised if their complaint has not been accepted, including details of their right to take this decision to the Ombudsman |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | (A link to the policy will be added before publication) |  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply:<br>Yes / No | Evidence  | Commentary / explanation  |
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| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes                 | (A link to the policy will be added before publication) | <p>There are several ways in which a complaint can be made, this is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>A Community Impact Assessment considers this and accompanies the policy.</p> <p>Tamworth Borough Council has mandatory equality and diversity training.</p> |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the   | Yes                 | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>All staff have the relevant access to log a complaint.</p> <p>The Comments, Compliments and Complaints policy is a mandatory policy for all staff to be aware of.</p>  |

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|     | appropriate person within the landlord.  |     |   |   |
| 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 | (A link to the policy will be added before publication) | <p>We encourage customers to tell us about their experience, good or bad, and/or suggest ways to improve our service delivery.</p> <p>This feedback can help us to:</p> <ul style="list-style-type: none"> <li>• improve our performance</li> <li>• improve our business processes • re-design our services</li> <li>• enhance our reputation</li> <li>• train and develop our employees</li> <li>• share good practice</li> <li>• demonstrate service excellence • support diversity and inclusion</li> </ul> <p>Customer feedback supports development of the customer experience in the Councils desire to improve service, satisfaction, and to ensure the Council is utilising the feedback provided by customers when planning, designing services and improving services.</p> <p>The Council will also be benchmarking against base line data.</p> <p>How to make a complaint is published on the website and provides details of the Housing Ombudsman.</p> |
| 3.4 | Landlords must make their complaint policy   | Yes | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy and published on the website.  |



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|     | 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. |     |   |   |
| 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 | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy  |
| 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   | Yes | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy<br><br>Stage 1 and Stage 2 acknowledgement letters provide details regarding acting on someone behalf. |

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|     | any meeting with the landlord.   |     |   |   |
| 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 | (A link to the policy will be added before publication) | This is detailed in complaint responses and on the website. |

**Section 4: Complaint Handling Staff**

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
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| 4.1            | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This | Yes              | (A link to the policy will be added before publication) | <p>The Councils Information Governance Manager (Monitoring Officer) is the councils designated complaint officer, and a centralised team is in place to facilitate the corporate complaints process.</p> <p>The Councils Assistant Director -People is the Ombudsman link officer.</p> <p>Designated Officers within each service area are responsible for investigation and review of complaints for their service. This is detailed in the Councils Comments Compliments, and Complaints Policy</p> |

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|     | role may be in addition to other duties.  |                       |   |   |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.  | Yes                   | (A link to the policy will be added before publication) | <p>The centralised team have access to all services and landlord functions.</p> <p>Clear processes are in place to define the management level required for complaint handling at each stage of the process. This is detailed in the policy</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 | Partial (In Progress) |   | <p>Officer competence is monitored through performance management processes to support and ensure officers are trained to required levels. Any identified training needs are actioned accordingly.</p> <p>Dedicated resource for complaint handling sits in the Information Governance team, with and a tenant analyst sitting within Housing, supporting at service level.</p> <p>Designated officers sit within service areas who are responsible for the complaint investigation and response.</p> <p>Further the council has appointed an external resource to provide increased training and competence in complaint response compilation.</p> |

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**Section 5: The Complaint Handling Process**

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
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| 5.1            | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.  | Yes              | (A link to the policy will be added before publication) | Tamworth Borough Council has a single policy for all complaints |
| 5.2            | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Yes              | (A link to the policy will be added before publication) | The policy details the 2-stage process.                         |
| 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              | (A link to the policy will be added before publication) | The policy details the 2-stage process.                         |

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| 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. | Partial (In progress)   |  | <p>Following a review of complaint notification procedures, a new procedure was implemented with the council's contractors Equans to support early notification of a complaint received. When?</p> <p>Equans is the primary repairs contractor and in recognition of the importance of dealing with complaints they now have a Resident Liaison Officer who investigates complaints from the contractor's perspective and feeds this into the overall Council response to complaints.</p> <p>The council has a contract in place with the repair's contractors, Equans and Wates setting out the requirements in relation to complaint responses.</p> <p>This is being further strengthened corporately and detailed in the action plan.</p> |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Partial - (In progress) |  | <p>Equans is the primary repairs contractor and in recognition of the importance of dealing with complaints they have now appointed a Resident Liaison Officer who investigates complaints from the contractor's perspective and feeds into the overall Council response to complaints.</p> <p>The council has a contract in place with the repair's contractors, Equans and Wates setting out the requirements in relation to complaint responses. Regular meetings are held with both</p>  |

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|     |   |     |  | <p>contractors to discuss performance and achievement against targets.</p> <p>This action is being further strengthened corporately by including all council contractors and detailed in the action plan.</p>  |
| 5.6 | <p>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.</p> | Yes | <p>(A link to the policy will be added before publication)</p> | <p>Detailed in the Councils Comments, Compliments and Complaints Policy.</p> <p>Acknowledgment letters document the details provided by the complainant. If further clarification is required, this is requested though the Information Governance team.</p> |
| 5.7 | <p>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.</p>   | Yes | <p>(A link to the policy will be added before publication)</p> | <p>Acknowledgment letters document the details provided by the complainant. If further clarification is required, this is requested though the Information Governance team.</p> <p>This being further strengthened with a review of letters</p>              |
| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p>  | Yes | <p>(A link to the policy will be added before publication)</p> | <p>The current policy details what the complaint handlers’ responsibilities are.</p>   |

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|      | <p>a. deal with complaints on their merits, act independently, and have an open mind;</p> <p>b. give the resident a fair chance to set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p> |                       |   | Any areas where further training is required will form part of training identified through the action plan   |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.  | Yes                   | (A link to the policy will be added before publication) | <p>The Information Governance team write to the complainant if the time period for complaint response is going to exceed timescales.</p> <p>Whilst we advise the complainant of any updates. The investigation into a complaint may not be complete and any timeframe for completion is in the hands of the nominated officer. Investigations are conducted expeditiously, and any delays are due to complexity and the time spent gathering and assessing the evidence before responding. In more complex cases there is often regular interaction with the complainant. In these cases, delays are often discussed and agreed.</p> |
| 5.10 | Landlords must make reasonable adjustments  | Partial (In progress) | <a href="#">Reasonable Adjustment Guidance</a>          | Reasonable adjustment guidance for all staff is available.   |

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|      | <p>for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p> |     |   | <p>A Community Impact Assessment accompanies the policy.</p> <p>TBC has mandatory equality and diversity training.</p> <p>This being further strengthened with a review of information received when a complaint is recorded by the Information Governance team and how this is shared with the relevant service area.</p> <p>At the point of logging a repair request the Repairs Contact Centre record the preferred contact and access arrangements with the tenant and share these with the contractor when handing off the repair.</p> |
| 5.11 | <p>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.</p>      | Yes | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p>   |
| 5.12 | <p>A full record must be kept of the complaint, and the outcomes at each stage. This must</p>  | Yes | (A link to the policy will be added before publication) | <p>Complaints are facilitated and recorded centrally through the Information Governance Team.</p>   |



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|      | 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.  |     |   | Designated officers are responsible for investigating and responding to complaints. Information is collated from the relevant sources and a response prepared for review and issue by the Information Governance Team.   |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Yes | (A link to the policy will be added before publication) | <p>The Stage 1 and Stage 2 complaints are delegated and assessed by designated officers within each service area.</p> <p>This allows for any remedy that can be actioned immediately to be carried out / arranged and the customer informed.</p> <p>For example: a repair requires an inspection, this can be arranged swiftly and does not require an in-depth investigation.</p> <p>Officers within the team are allocated responsibility for responding at the various stages of complaints, information is collated from the relevant sources and a response prepared for review and issue by the Information Governance Team.</p> <p>Where possible and appropriate a complaint relating to a repair will result in either an inspection or an instruction to the contractor to attend to deal with the item of repair.</p> |

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| 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 | <a href="#">Managing Unreasonable Customer Behaviour Policy</a> | This is detailed in the Managing Unreasonable Behaviour Policy. |
| 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 | <a href="#">Managing Unreasonable Customer Behaviour Policy</a> | Detailed in the Managing Unreasonable Behaviour Policy.         |

**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 | Yes              | (A link to the policy will be added before publication) | The Stage 1 and Stage 2 complaints are delegated and assessed by designated officers within each service area. |

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|     | <p>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.</p> |                       |   | <p>This allows for any remedy that can be actioned immediately to be carried out / arranged and the customer informed.</p> <p>For example: a repair requires an inspection, this can be arranged swiftly and does not require an in-depth investigation.</p> <p>Officers within the team are allocated responsibility for responding at the various stages of complaints, information is collated from the relevant sources and a response prepared for review and issue for the Information Governance Team. Where possible and appropriate a complaint relating to a repair will result in either an inspection or an instruction to the contractor to attend to deal with the item of repair.</p> |
| 6.2 | <p>Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <b><u>within five working days of the complaint being received.</u></b></p>   | Yes                   | (A link to the policy will be added before publication) | <p>Detailed in the Councils Comments, Compliments, and Complaints Policy</p> <p>The Information Governance team record all communication received through the Comments, Compliments &amp; Complaints process.</p>  |
| 6.3 | <p>Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.</p>  | Partial (In Progress) | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>The percentage of Stage 1 responses provided within the required timescale (10 working days) is a key measure within performance reports.</p>   |

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|     |  |     |  | <p>The council recognises that 100% of responses are not within this timescale for 2023/2024.</p> <p>This being further strengthened and a key focus for 2024/2025, by monitoring progress and regular reporting to Heads of Service and Assistant Directors, providing updated guidance and additional training.</p>                      |
| 6.4 | <p>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.</p> | Yes | <p>(A link to the policy will be added before publication)</p> | <p>The Information Governance team will write to the complainant if an extension is required/agreed, including details of the Housing Ombudsman contact details.</p> <p>Officers are reminded and required to advise the Information Governance team if an extension of time is required as part of the service notification procedure</p> |
| 6.5 | <p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>  | Yes |  | <p>The Information Governance team write to the complainant if an extension is required/agreed.</p>  |

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| <p>6.6</p> | <p>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.</p> | <p>Partial (In progress)</p> |  | <p>The Information Governance team record any actions arising from complaints, liaising with relevant teams until completed.</p> <p>This is being further strengthened through training, ongoing monitoring and improved processes.</p>  |
| <p>6.7</p> | <p>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.</p>   | <p>Yes</p>                   | <p>(A link to the policy will be added before publication)</p> | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>To further strengthen this a review of complaint responses is underway and where improvement is necessary guidance and training will be provided</p>  |
| <p>6.8</p> | <p>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</p>  | <p>Yes</p>                   |  | <p>Where the centralised team identify additional elements, these are assessed and actioned appropriately. For example, through logging another complaint, adding details to an existing complaint or raising a service request if this is the first time the council is aware of the issue.</p> |

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|            | <p>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.</p>  |            |  |  |
| <p>6.9</p> | <p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | <p>Yes</p> | <p>(A link to the policy will be added before publication)</p> | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>Letter templates are currently under review to support complaint handlers with responses.</p> |

Stage 2

| Code provision | Code requirement  | Comply: Yes / No      | Evidence  | Commentary / explanation   |
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| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.                              | Yes                   | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy   |
| 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                   | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy   |
| 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                   | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy   |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes                   | (A link to the policy will be added before publication) | All stage 2 complaints are dealt with by a senior designated officer (EG: Head of Service / Assistant Director)  |
| 6.14           | Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.   | Partial (In-Progress) | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy<br><br>The percentage of Stage 2 responses provided within the required timescale (20 working |

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|      |   |                       |  | <p>days) is a key measure within performance reports.</p> <p>The council recognises that 100% of responses are not within this timescale for 2023/2024.</p> <p>This being further strengthened and a key focus for 2024/2025</p> |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes                   |  | <p>The Information Governance team write to the complainant if an extension is required.</p> <p>Officers are reminded and required to advise the Information Governance team if an extension of time is required.</p>            |
| 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                   |  | <p>The Information Governance team write to the complainant if an extension is required/agreed.</p>  |
| 6.17 | A complaint response must be provided to the resident when the answer to the  | Partial (In Progress) |  | <p>The Information Governance team record any actions</p>  |



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|      | 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.  |     |   | <p>arising from complaints, liaising with relevant teams until completed.</p> <p>This is being further strengthened through training, ongoing monitoring and improved processes.</p>  |
| 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 | (A link to the policy will be added before publication) | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>To further strengthen this a review of complaint responses is underway and where improvement is necessary guidance and training will be provided</p> |
| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> </ul> | Yes | (A link to the policy will be added before publication) | This is detailed in the Councils Comments Compliments, and Complaints Policy  |

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|      | g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.             |     |  |  |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes |  |  |

**Section 7: Putting things right**

| Code provision | Code requirement   | Comply: Yes / No      | Evidence | Commentary / explanation  |
|----------------|--|-----------------------|----------|---|
| 7.1            | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Partial (In progress) |          | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>This being further strengthened to support areas, with review of templates, training needs being identified and additional resources within the housing service.</p> |

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| <p>7.2</p> | <p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>   | <p>Yes</p> |  | <p>Proportionate remedies are offered where a complaint is upheld or partially upheld. For example, these can range from an apology, an agreement to carry out or complete repair work, or the payment of appropriate monetary compensation.</p> <p>The council seeks to return the complainant to the position they would have been had the service failure not occurred</p> <p>In respect of repairs the main aim is to remedy the failing. Where a failing has been identified the Council will acknowledge this and respond with an apology on behalf of the contractor and the council.</p> |
| <p>7.3</p> | <p>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.</p> | <p>Yes</p> |  | <p>This is detailed in the Councils Comments Compliments, and Complaints Policy</p> <p>The complaint response details any remedy offered, for example if a new appointment is made for a missed appointment.</p>   |

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|     |  |                       |  | Any complaint response relating to repairs will clearly set out details of the proposed remedy, who will action this and when it will be actioned by. The HoS will monitor to ensure completion at service level. The Information Governance team record and monitor corporately any actions arising from complaint responses. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Partial (In Progress) |  | This is detailed in the Councils Comments Compliments, and Complaints Policy<br><br>This to be further strengthened through the compensation policy and training   |

**Section 8: Putting things right**

| Code provision | Code requirement   | Comply: Yes / No      | Evidence | Commentary / explanation   |
|----------------|--|-----------------------|----------|--|
| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:<br>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. | Partial (In progress) |          | Regular reporting is provided to CMT, Cabinet and the wider organisation through the quarterly performance report. In addition to regular reporting to the Statutory Officers group. |

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|     | <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord’s performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p> |     |  | <p>The Annual Complaints Performance and Service Improvement Report 2023-2024 is published on the website along with the governing body statement.</p> <p>Additional opportunities for learning from complaints have been identified and will be developed throughout 2024 – 2025.</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 | (A link to the report will be added before publication)          | <p>The Annual Complaints Performance and Service Improvement Report for 2023-2024 was reported to the governing and published on the Councils Website</p>  |
| 8.3 | <p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>   | Yes | (A link to the self-assessment will be added before publication) | <p>The self-assessment has been reviewed as part the introduction of the statutory complaint handling code</p>   |
| 8.4 | <p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>  | Yes |  | <p>The self-assessment will be reviewed if requested by the Housing Ombudsman</p>  |
| 8.5 | <p>If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform</p>   | Yes |  | <p>This requirement has been noted and will be complied</p>  |

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|  | 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. |  |  | with in the event of such circumstances. |
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**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.   | Partial (In Progress) |          | <p>Examples of learning have been a detailed approach to dealing with Damp &amp; Mould, development of a Damp &amp; Mould Policy, development of a compensation policy and changes within the contractor's team to allow them to better respond to complaints.</p> <p>This area is being further developed to ensure that insights gained from complaints are incorporated into routine business operations</p> |
| 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. | Partial (In Progress) |          | <p>This area is being further developed to ensure that insights gained from complaints are incorporated into routine business operations</p>  |
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on  | Yes                   |          | <p>Regular reports to Statutory Officers, and Tennant Complaints group.</p>   |

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|     | wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.  |     |   | <p>Performance information shared with residents as part of the newsletter available. The newsletter regularly contains articles relating to articles relating to feedback such as "You Said – We Did"</p> <p>Tenants Annual Report includes details on complaint handling, learning and improvement.</p> <p>Landlord performance including complaints will be reviewed and scrutinised by the Housing &amp; Homelessness Advisory Board which includes 2 tenant representatives. With the introduction of the Regulator of Social Housing's (RSH) New Tenant Satisfaction Measures, the Council's performance will be published on the Council's website.</p> |
| 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 | Yes | Zoe Wolicki – Assistant Director People |  |



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|     | policies and procedures that require revision.   |     |  |  |
| 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 |  | Requirement has been identified and member responsible for complaints is the Leader of the Council – Carol Dean as portfolio holder responsible for complaints and the Portfolio Holder for Housing, Homelessness & Planning – Councillor Ben Clarke |
| 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 |  | The MRC will receive regular updates through portfolio meetings  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> </ul> | Yes |  | <p>The MRC will receive regular updates through portfolio meetings</p> <p>Oversight of quarterly and annual reports, with the aim to further strengthen this as we move through the first 12 months under the new code</p>                           |

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|     | d. annual complaints performance and service improvement report.   |    |  |  |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | No |  | <p>This is a development area for 2024-25, the team will set out this requirement for third parties Employees role profiles will be updated to incorporate these requirements.</p> |