

Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<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	<ul style="list-style-type: none"> • Customer Feedback policy • Customer Feedback - Staff Guidance • Website information page (Customer Feedback - West Lancashire Borough Council) 	<p>The Council has one Customer Feedback Policy for Tenants, Residents and Customers. The Councils definition within the policy, reflects the Ombudsman's definition of a complaint with the exception of the word 'landlord'. This is due to the Council adopting one policy for all which is based on the requirements of the Housing Ombudsman Complaint Handling Code.</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 representative must be handled in line with the landlord's complaints policy.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy • Customer Feedback - Staff Guidance 	<p>We provide training for officers as well as a detailed staff guide to ensure that they can identify complaints and how to handle these even if a customer does not use the word "complaint". Our Customer Feedback policy sets out how we handle all feedback and</p>

				how complaints can be submitted by a third party/representative.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy • Customer Feedback Staff Guidance 	<p>The Customer Feedback Policy sets out the difference between a Service Request and a Complaint.</p> <p>The team responsible for triaging feedback are trained and understand how to differentiate between a Service Request and a Complaint. Our Customer Services team are also trained and able to recognise the difference between a complaint and a service request and process them on behalf of customers.</p> <p>Our staff guidance also explains how to differentiate between a Service Request and a Complaint, which all officers have access to, to support them when interacting with customers.</p>

				Any service requests that are received through the Council's customer feedback process are recorded, processed and monitored with the customer being updated on the action taken.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<ul style="list-style-type: none"> • Customer Feedback – Staff Guidance • Website information page (Customer Feedback - West Lancashire Borough Council (westlancs.gov.uk)) 	<p>Our experienced Customer Service staff have the sufficient knowledge and expertise to advise customers of the complaints policy and /or submit a complaint on their behalf when a customer is dissatisfied with a service request. They are also able to identify if a service request has not been handled effectively and will proactively raise a complaint, discussing this with the customer.</p> <p>Our website also provides guidance to customers on how to make a complaint if they remain dissatisfied</p>

				<p>with the outcome of a service request .</p> <p>If a complaint is made, we continue to address the service request whilst the complaint investigation is ongoing.</p>
1.6	<p>An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	Yes	<ul style="list-style-type: none"> N/A 	<p>Any signs of dissatisfaction during feedback obtained on a face-to-face basis, will be discussed with the customer and they will be supported and guided on how to make a complaint.</p> <p>When customers are completing surveys/consultations that are published via the Councils digital consultation platform, are advised how to make a complaint. A link to the customer feedback policy and process on the Council's website is also provided.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	The Customer Feedback policy sets out the reasons when a complaint cannot be considered. In these instances, customers will be advised of the reasons why their complaint cannot be accepted, and sign posted to further support. All other complaints are accepted, investigated, and responded to on their own merit.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and 	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	Our Customer Feedback Policy sets out the circumstances in which a matter will not be considered as a complaint or escalated.

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy. 			
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 consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	<p>This requirement is outlined in our Customer Feedback Policy.</p>
2.4	<p>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.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	<p>The Customer Feedback policy clearly states the basis for when a complaint will not be accepted. If a customer chooses to submit a complaint, they will be advised of the reasons why their complaint does not meet our policy along with information in relation to how they can escalate this to the Housing Ombudsman along with the relevant contact details.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they</p>	Yes	<ul style="list-style-type: none"> • Business Support Triage Staff Guidance 	<p>Upon complaints being triaged, staff are trained to consider individual</p>

	must consider the individual circumstances of each complaint.			circumstances and each complaint is triaged in line with our customer feedback policy. This is also outlined in the Business Support Triage Staff Guidance.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy • Customer Feedback Staff Guidance 	<p>Complaints can be made in the following ways:</p> <ul style="list-style-type: none"> • By completing an Online form on our website • By contacting our Customer Services Team over the phone • By visiting one of our Customer Services Points • By writing to us <p>If a customer contacts an officer directly, there is a process in place for recording the complaint as it would be should it have come through one of the channels above.</p>

				<p>Our Customer Feedback Policy outlines how we will support customers to make a complaint where a reasonable adjustment is required.</p> <p>Our staff guidance also includes a key step when officers are reviewing a complaint to consider any reasonable adjustments that the customer may need.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>Our Customer Feedback Policy sets out the various ways customers can make a complaint. If a customer contacts an officer directly, a process is in place for recording the complaint for the customer.</p> <p>Our staff guidance also includes the steps officers must take to ensure complaints received directly to them are recorded.</p> <p>All staff have received initial and refresher training, and this is an ongoing process.</p>
3.3	High volumes of complaints must not be seen as a negative, as they can be	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	We regard all complaints as a great source of

	<p>indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>		<ul style="list-style-type: none"> • Customer Feedback Annual Report 	<p>information; they help us to understand how our customers perceive us, what they expect from us and how we can use feedback to shape our services. We use complaints to generate valuable learning needed for services to improve or change the way we deliver them. The importance of learning from complaints and the benefits they bring to both the customer and the Council is a key factor in our staff guidance and complaints training.</p>
3.4	<p>Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	<p>Our Customer Feedback Policy has been written in plain English. Our website has a dedicated area in relation to customer feedback and complaints which includes the policy.</p> <p>The policy details the two stages, what customers can expect at each stage and the timeframes for responding.</p>

				Our website can be translated using ReachDeck translation service, this includes screen reader and translation into other languages.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback policy outlines how we publicise details of the policy. It also includes information relating to the Housing Ombudsman, Complaint Handling Code, and annual self-assessments.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	We will accept complaints from an advocate/representative, which can include an elected member, on behalf of a tenant. They are also able to accompany tenants at any meetings in relation to their complaint.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback Policy informs customer that they can access the Housing Ombudsman Service throughout their complaint for impartial advice and support. The

				<p>guidance also includes how to escalate a complaint to the Ombudsman should they remain dissatisfied following our stage two decision.</p> <p>This guidance is also available on our Website, in promotional material and included in all correspondence at each stage of the process.</p>
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>The Council has a centralised customer feedback team who triage, allocate to an investigating officer and monitor complaints through to completion.</p> <p>Individual service managers and Directors are also responsible for investigating and responding to</p>

				<p>complaints.</p> <p>The Council's Housing Regulatory & Quality Manager is the responsible officer for Housing complaints, reporting to Landlord Services Committee and liaising with the Housing Ombudsman.</p>
4.2	<p>The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.</p>	Yes	<ul style="list-style-type: none"> N/A 	<p>Complaints investigating officers have access to all staff at all levels to facilitate the resolution of complaints. As they are senior officers, they have the authority and autonomy to act to resolve disputes promptly and fairly.</p>
4.3	<p>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</p>	Yes	<ul style="list-style-type: none"> N/A 	<p>We prioritise complaint handling and created a dedicated centralised team to ensure all complaints are recorded, triaged, investigated and monitored.</p> <p>Learning from complaints is addressed and action plans developed and updated to ensure learning and actions are implemented.</p> <p>All staff involved in the</p>

				handling of complaints have received initial and ongoing training. A dedicated support area in relation to complaint handling is available via the staff intranet, along with staff guidance, e-learning, letter templates, and links to the Housing Ombudsman Training.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	The Council has one Customer Feedback Policy for dealing with complaints which adheres to the Housing Ombudsman Complaint Handling Code. We encourage customers to give us feedback and use the feedback to help shape and improve the services we deliver
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	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	Our Customer Feedback Policy documents our 2-stage approach to handling Complaints

	complaint') as this causes unnecessary confusion.			
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback Policy documents our 2-stage approach to handling Complaints
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy • Customer Feedback Staff Guidance 	Where a complaint involves a 3rd party e.g., contractor, the complaint will be handled in line with our 2-stage approach to handling complaints which is detailed in Our Customer Feedback Policy. If input is required from a 3rd party this will form part of the investigation and responded to in line with the policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy • Customer Feedback Staff Guidance 	Where a complaint involves a 3rd party e.g., contractor, the complaint will be handled by the Council in line with our 2-stage approach to handling complaints which is detailed in Our Customer Feedback Policy. If input is required from a 3rd party this will form part of the

				investigation and responded to in line with the policy.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<ul style="list-style-type: none"> • Customer feedback staff guidance 	All correspondence includes the complaint definition and the outcome the resident has set out that they are seeking. If at any point this is unclear, the investigating officer will contact the resident to seek clarification.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	As our Customer Feedback Policy stipulates, if any aspects of a complaint are not the responsibility of the Council, this will be explained fully to the resident and they will be signposted to the relevant authority along with contact details.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; 	Yes	<ul style="list-style-type: none"> • Customer Feedback Staff Guidance 	Our staff guidance stipulates how officers should handle complaints effectively ensuring: <ul style="list-style-type: none"> a. they deal with complaints on their merits, act independently, and have an open mind; b. give residents a fair

	<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>			<p>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>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Staff Guidance 	<p>In the event of a complaint exceeding timescales, our staff guidance stipulates the approach officers should take, including agreeing with the customer a schedule for regular updates to ensure they are kept informed about their complaint.</p>
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	<p>Our Customer Feedback Policy sets out our commitment to supporting residents that need reasonable adjustments.</p>
5.11	<p>Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	<p>Our Customer Feedback Policy and stage one responses provide guidance</p>

	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>to customers on how to escalate their complaint to stage two.</p> <p>The Customer Feedback policy sets out the reasons when a complaint cannot be considered (Customer Feedback policy pages 2-4). In these instances customers will be advised of the reasons why their complaint cannot be accepted and sign posted to further support. All other complaints are accepted, investigated and responded to on their own merit.</p>
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>All feedback is recorded via our CRM system, which captures the initial complaint & date received. The system captures all correspondence throughout the complaints journey with the resident.</p> <p>Investigation officers record all investigation notes, correspondence with 3rd parties, supporting</p>

				documentation and actions locally.
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	<ul style="list-style-type: none"> • Customer Feedback Policy • Goodwill/Discretionary Payment Policy 	<p>Our Customer Feedback policy and staff guidance sets out our approach to remedies.</p> <p>To support officers when assessing and awarding remedies we have a Goodwill /Discretionary Payment Policy.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback Policy and internal procedures detail our approach to managing unacceptable behaviour.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	As stipulated in our Customer Feedback Policy, each case is reviewed individually with consideration being given to the individual and their circumstances.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	The investigation officer will consider each complaint and the level of complexity. For non-complex complaints, these will be resolved and responded to promptly. For complex complaints, a full investigation will take place and consideration given to the timescales involved and the resident will be kept updated. Consideration will also be given to the needs/vulnerabilities of the resident.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	Our Customer Feedback policy sets out our approach to dealing with stage 1 complaints. All complaints are logged and receive an auto acknowledgement upon submission. Once triaged and allocated to the relevant investigation officer,

				a further acknowledgement, is issued, this is completed within 5 working days.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback policy sets out our approach to dealing with and responding to stage 1 complaints in line with timescales set out by the Housing Ombudsman Complaint Handling Code (10 working days).
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	The policy sets out the reasons when extensions may be required - these are by exception. Where extensions are used, this is fully explained to the resident, along with timescales for when the full response will be provided, which will not exceed a further 10 days.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<ul style="list-style-type: none"> • Letter template 	The notification sent to the resident advising of the extension contains the Housing Ombudsman's details and advises them of their right to contact them if required
6.6	A complaint response must be provided to the resident when the answer to the	Yes		Our staff guidance stipulates that a response is sent to

	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.		<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	the customer when the answers are known. Staff will ensure a time scale for any outstanding actions are communicated to the customer within the initial response. Outstanding actions will be tracked by staff, the customer will be is regularly updated throughout the progress.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>Our Customer Feedback staff guidance captures this requirement as an important step to follow and forms a key step in our training guidance "Making and Communicating the outcome/decision".</p> <p>Our centralised Business Support team review all responses before they are issued and will address any areas that do not meet these requirements with the investigating officer prior to the response being issued.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	Our feedback policy clearly sets this out. This is also covered in our

	and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.		<ul style="list-style-type: none"> Customer Feedback Policy 	comprehensive Customer Feedback staff guidance.
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol 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; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>All stage 1 responses include these elements.</p> <p>Our staff guidance captures this requirement as an important step to follow and forms a key step in our training guidance "Making and Communicating the outcome/decision".</p> <p>In addition, response templates have been designed to ensure the response meets the requirement.</p> <p>Our centralised Business Support team also review all responses before they are issued and will address any areas that do not meet these requirements, with the investigating officer, prior to the response being issued</p>

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	Our Customer Feedback Policy details how residents can escalate their complaint to stage 2. Our response letter at stage 1 also sets this out.
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	All stage 2 complaints are logged and receive an auto acknowledgement on the day we receive the escalation request. A further acknowledgement is issued once triaged and assigned to the investigating officer within 5 working days.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	<ul style="list-style-type: none"> Customer Feedback Policy Customer Feedback Staff Guidance 	Our Customer Feedback Policy explains how residents can escalate their complaint to stage 2. Our Staff Guidance outlines the requirements for staff to make contact with the customer to understand why they remain dissatisfied.
6.13	The person considering the complaint at stage 2 must not be the same person	Yes	<ul style="list-style-type: none"> Customer Feedback Policy 	Our Customer Feedback Policy and procedure

	that considered the complaint at stage 1.			outlines who is responsible for handling the complaint at each stage. Stage two complaints are investigated by a different and more senior officer to the officer who investigated at stage one.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> • Customer Feedback Policy 	Our Customer Feedback policy sets out our approach to dealing with and responding to stage 2 complaints in line with timescales set out by the Housing Ombudsman Complaint Handling Code (20 working days).
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident 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	<ul style="list-style-type: none"> • Customer Feedback Policy 	The policy sets out the reasons when extensions may be required - these are by exception. Where extensions are used, this is fully explained to the resident, along with timescales for when the full response will be provided, which will not exceed a further 10 days.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<ul style="list-style-type: none"> • Letter template 	The notification sent to the customer advising of the extension contains the Housing Ombudsman's

				details and advises the tenant of their right to contact them if required
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	<p>Our staff guidance stipulates that a response is sent to the customer when the answers are known. Staff will ensure a time scale for any outstanding actions are communicated to the customer within the initial response. Outstanding actions will be tracked by staff, the customer will be is regularly updated throughout the progress.</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	<ul style="list-style-type: none"> Customer Feedback staff guidance Our training guidance "Making and Communicating the outcome/decision" 	<p>Our Customer Feedback staff guidance captures this requirement as an important step to follow and forms a key step in our training guidance "Making and Communicating the outcome/decision".</p> <p>Our centralised Business Support team review all responses before they are issued and will address any areas that do not meet these requirements with the</p>

				investigating officer prior to the response being issued.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<ul style="list-style-type: none"> • Customer Feedback staff guidance • Our training guidance "Making and Communicating the outcome/decision". 	<p>All stage 2 responses include these elements.</p> <p>Our staff guidance captures this requirement as an important step to follow and forms a key step in our training guidance "Making and Communicating the outcome/decision".</p> <p>In addition, response templates have been designed to ensure the response meets the requirement.</p> <p>Our centralised Business Support team also review all responses before they are issued and will address any areas that do not meet these requirements, with the investigating officer, prior to the response being issued</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<ul style="list-style-type: none"> • Customer Feedback Staff Guidance 	<p>Stage 2 is our final response. All staff relevant to the investigation will be involved and with the final decision being given by the</p>

				relevant Head of Service
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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"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<ul style="list-style-type: none"> • Customer Feedback Staff Guidance • Goodwill/Discretionary Payment Policy • Quarterly Reports to Corporate Management Team 	<p>This is set out in our response at both stage 1 and stage 2.</p> <p>Our staff guidance sets out best practice and standards on how to provide a complaint response.</p> <p>We also have a Goodwill/Discretionary Payment Policy, which outlines how officers will determine if a goodwill gesture and or a discretionary quantifiable payment will be considered as one of the solutions to redress the situation and put things right.</p> <p>We have a process in place which enables learning and</p>

				improvement based on customer feedback.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<ul style="list-style-type: none"> • Goodwill/Discretionary Payment Policy • Customer Feedback policy • Staff Guidance 	Our Customer Feedback policy and Goodwill/Discretionary Payment policy sets out to residents our approach to remedies. We also have staff guidance to support staff when offering remedies to customers.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<ul style="list-style-type: none"> • Customer Feedback staff training and guidance 	Our Customer Feedback staff training and guidance covers this element and the need to ensure remedies are followed through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<ul style="list-style-type: none"> • Customer Feedback staff training and guidance 	The guidance on remedies issued by the Housing Ombudsman was considered as part of the introduction of the Goodwill/Discretionary Policy.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <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>	Yes	<ul style="list-style-type: none"> • Customer Feedback Annual Report • Housing Ombudsman Self- Assessment 	<p>An annual report in relation to complaint performance is produced and presented to elected members, this includes the service improvements identified and progress against these.</p> <p>A quarterly performance report is also taken to Landlord Services Committee, for scrutiny by tenants and elected members.</p> <p>Prior to 2024 code, the self-assessment was completed and presented on the Council's website. A separate Ombudsman report was also presented to members.</p> <p>Moving forward the annual report will include the self-assessment and the annual report from the Housing</p>

				Ombudsman and the LGSCO ombudsman.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<ul style="list-style-type: none"> Customer Feedback Annual Report 	<p>An annual report in relation to complaint performance is produced and presented to elected members, this includes the service improvements identified and progress against these.</p> <p>A quarterly performance report is also taken to Landlord Services Committee, for scrutiny by tenants and elected members.</p> <p>We also have a web page purely relating to complaints performance, which also publishes the annual report and service improvement plan. The annual report for 23/24 is currently being written, once published, this will be available via the Council's website.</p> <p>Prior to 2024 code, the self-assessment was completed and presented on the Council's website. A</p>

				<p>separate Ombudsman report was also presented to elected members.</p> <p>Moving forward the annual report will include the self-assessment and the annual report from the Housing Ombudsman and the LGSCO ombudsman.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<ul style="list-style-type: none"> • N/A 	This would be undertaken in these instances.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<ul style="list-style-type: none"> • N/A 	We acknowledge this and commit to undertake
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	<ul style="list-style-type: none"> • N/A 	If in exceptional circumstances, we are unable to comply with the code we will follow the guidance set out in the code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<ul style="list-style-type: none"> Customer Feedback Action Plan 	As part of the Customer Feedback Process, the feedback is analysed to identify service improvement opportunities which result in the creation of action plans. These are monitored and reported through the Housing Landlord Services Committee quarterly and council governance structure annually
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<ul style="list-style-type: none"> Customer Feedback Staff Guidance 	The council promotes a positive complaint handling culture. As part of the customer feedback process, complaints are analysed to identify common themes to drive positive improvements in service delivery.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to	Yes	<ul style="list-style-type: none"> Customer Feedback Annual Report 	Through quarterly and annual reporting (customers, staff, residents, and elected members) we will evidence our

	stakeholders, such as residents' panels, staff and relevant committees.			commitment to learning from mistakes and demonstrate that we have listened to feedback
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<ul style="list-style-type: none"> N/A 	<p>Themes and trends are assessed both within service by the Senior Managers and Head of Service and then reported on and analysed by the Corporate Management Team to identify potential systemic issues, serious risks or policies and procedures that require revision.</p> <p>Action plans put in place to address any themes or trends identified, along with data analysis/actions are shared with staff at regular team briefings and where appropriate with external contractors.</p>
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	Yes	<ul style="list-style-type: none"> N/A 	The Council's Lead Member for Housing (Councillor Pryce-Roberts) is responsible for meeting this requirement.

	Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	<ul style="list-style-type: none"> Landlord Services Committee Report 	The Lead Member for Housing works closely with the Housing Regulatory & Quality Manager to ensure that reports on complaint handling performance are provided to elected members.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<ul style="list-style-type: none"> Landlord Services Committee Report 	The Lead Member for Housing works closely with the Housing Regulatory & Quality Manager, to ensure that the Landlord Services Committee receive updates in line with the Complaint Handling Code. Reports identify all themes, trends and any requirements from Housing Ombudsman, along with any service improvement plan(s) and associated performance data.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:	Yes	<ul style="list-style-type: none"> Customer Feedback Policy Customer Feedback Staff Guidance 	The Customer Feedback Policy and comprehensive staff guide are aligned to our Staff Behaviour

	<p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<ul style="list-style-type: none"> • Staff Behaviour Framework 	<p>Framework.</p> <p>Key requirements for staff have been set out as part of our staff guidance for complaint handling and training which includes: Working collaboratively across the organisation when handling complaints, with the focus being on working together to resolve the complaint, putting it right and preventing the same situation from re-occurring.</p> <p>Clearly defined roles and responsibilities.</p>
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