

Self-Assessment 2022

Housing Ombudsman Complaint Handling Code (revised 1 April 2022)



Section 1 – Definition of a Complaint

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	The Customer Feedback Policy defines a complaint as: <i>A statement that an injustice has been sustained as a consequence of maladministration. An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its own colleagues or those acting on its behalf affecting residents.</i>
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	Complaints are accepted whether the word “complaint” is used or not. Complaints will be accepted from third parties or representatives; the Customer Feedback Policy has been updated for clarity, as this was not previously specified.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	No	Process improvement is required to ensure that service requests are consistently recorded and escalated to a complaint in line with this Code provision.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	The Customer Feedback Policy confirms that we accept all complaints apart from where it is not a complaint, such as a service request, or an appeal
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	The Customer Feedback Policy clearly sets out the circumstances in which a matter will not be considered, and how such circumstances will be dealt with instead; these are fair and reasonable to residents.

1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	<p>Where a complaint is not accepted, a detailed explanation is provided to the resident, and they are advised of the right to take this decision to the Housing Ombudsman.</p> <p>The Customer Feedback Policy sets out the right to contact the Housing Ombudsman, and has been updated to make clear that this right also applies to a Council decision not to accept a complaint.</p> <p>Correspondence sent to residents whose feedback has been accepted as a comment instead of a complaint will be updated so that, where applicable, the right to contact the Housing Ombudsman is clear.</p>
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Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Generally the difference between a service request and a complaint is recognised, however, additional training is planned to be delivered to ensure a consistent understanding across all of Housing & Property Services.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	No	<p>This information is included in the annual perception survey of tenants, but transactional surveys undertaken by Housing & Property Services do not currently make clear how to pursue dissatisfaction as a complaint.</p> <p>Housing & Property Services’ overall approach to transactional surveys is to be reviewed, and future transactional surveys will include additional information on how dissatisfaction can be pursued as a complaint should the resident wish to do so.</p> <p>Point of contact surveys include information on how to pursue dissatisfaction as a complaint.</p>

Section 2 – Accessibility and awareness

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints are accepted through all channels, and this is confirmed in the Customer Feedback Policy.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	The Customer Feedback Policy clearly sets out the number of stages involved in the complaints process, what will happen at each stage, and the timeframes for responding. The Policy is available in a variety of formats and languages and has been updated to ensure this is clear within the Policy itself.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	The NKDC website has a specific Customer Feedback page which has the Customer Feedback Policy and additional information on how to give feedback. Search has been manipulated on the website so this is the first result returned when searching for complaints, and Google search has also been optimised so this is the first result when searching for NKDC complaints. Additionally, the “Contact Us” section shown at the bottom of every page on the website includes a link to the Customer Feedback Page.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	The Customer Feedback Policy sets out that “If a customer needs additional support or reasonable adjustments to provide their feedback, the council will ensure that this is provided.”, and the updated Policy has been subject to an Equality Impact Assessment. Complaint handling refresher training is planned to be delivered, which will ensure complaint handlers understand how to deal with such requests appropriately.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	The complaints process and access to the Housing Ombudsman is communicated regularly through the tenants’ magazine, “At Home” and the Housing social media accounts.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No	Contact information for the Housing Ombudsman is not generally included as part of regular correspondence with residents, but a new letterhead for Housing & Property Services will be developed that includes the Housing Ombudsman contact details, to ensure compliance with this Code Provision is achieved.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	The Customer Feedback Policy sets out that the Housing Ombudsman may be contacted at any point for additional support, and that the full complaint process does not need to be completed in order to do this. Complaint acknowledgements and Stage 1 responses also include this information. They will be reviewed to ensure advice about accessing the Housing Ombudsman is provided directly to complainants at all stages of the complaints process.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Complaints are accepted through all channels, including corporate social media; this is confirmed in the Customer Feedback Policy which also sets out the steps that will be taken to maintain confidentiality when a complaint is received via social media. A Social Media Protocol for Housing & Property Services has been developed, with provision for a consistent approach to accepting complaints through these channels.

Section 3 – Complaint handling personnel

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes	This role is an organisation wide administration team (“NK-Feedback”) that acknowledges complaints and ensures they are dealt with in a timely manner and in accordance with the Customer Feedback Policy; however, improvements are required in reporting complaints to the governing body (see also Code Section 7.4)
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Assistant Director for Housing and Property Services has overall responsibility for complaints within the service, however there is currently no specific role allocated to deal with service complaints. This will be reviewed, given the increasing volume of complaints received, to ensure the Council remains able to ensure that complaints receive the necessary attention. Stage 2 complaints are dealt with by the Assistant Director for Corporate and Community Services. Complaint handling refresher training is planned to be delivered, to ensure that complaint handlers continue to have the appropriate skills and maintain awareness of complaint handling best practice.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	The Assistant Director for Housing and Property Services has overall responsibility for complaints within the service, however there is currently no specific role allocated to deal with service complaints. This will be reviewed, given the increasing volume of complaints received, to ensure the Council remains able to ensure that complaints receive the necessary attention. Complaint handling refresher training is planned to be delivered, to ensure that complaint handlers continue to have the appropriate skills and maintain awareness of complaint handling best practice.

Section 4 – Complaint handling principles

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord’s audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident’s concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘pre-complaint stage’) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt .	No	The Customer Feedback Policy confirms there is no Stage “0” or equivalent. All complaints received by NK-Feedback are acknowledged within 5 days. Improvements in record-keeping are required to be able to demonstrate that decisions taken to try and resolve a concern are taken in agreement with the resident, and implementation of additional functionality to the Council’s Housing Management System is planned in order to facilitate this.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	No	Housing complaints are administrated centrally by the Senior Customer Service Advisor in the Customer Service Team, along with other complaints received by the Council. Currently there is insufficient capacity within this function to provide a more detailed acknowledgement, but resourcing is to be expanded so that these requirements can be met in future.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The Customer Feedback Policy sets out that “A senior officer within the team, who is not implicated in the complaint, will conduct a full and objective investigation, by looking over relevant documents, exploring the transaction that took place and talking to any officers involved.” The Assistant Director for Housing & Property Service is responsible for ensuring that complaints are dealt with in an impartial manner.

4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Complaint handling refresher training is planned to be delivered, to ensure that complaint handlers continue to have the appropriate skills and maintain awareness of complaint handling best practice.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	No	Improvements in record-keeping are required to be able to consistently record arrangements agreed with residents in terms of frequency and method of communication; and to monitor adherence with these agreements. Implementation of additional functionality to the Council's Housing Management System is planned in order to facilitate this in the longer term, and alternative interim solutions are to be investigated.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	No	Complaint handlers give the complainant a fair chance to set out their position, as well as any staff member who is the subject of the complaint. However, they do not provide residents with a chance to comment on any adverse findings before the final decision is made. Resourcing within the Customer Service Team is to be expanded to enable capacity to undertake this as part of overall complaints coordination.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The Customer Feedback Policy sets out that a request to proceed to Stage 2 of the process should be received within 3 months of the Stage 1 response being sent.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Complaints are not unreasonably refused to be escalated at any stage of the procedure, and the reasons for declining to escalate a complaint are the same as for not accepting a complaint. The Customer Feedback Policy has been updated to ensure this is clear within the Policy itself.

4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	Complaint records are held and coordinated centrally by the Customer Engagement Manager, and all information received is recorded and managed accordingly. Improvements in record-keeping are required to improve assurance that all relevant information relating to a complaint is consistently shared in the central complaints filing system, and implementation of additional functionality to the Council's Housing Management System is planned in order to facilitate this.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	The Unacceptable Behaviour Policy was implemented in June 2022 and all colleagues have recently received training on its provisions.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	No	Improvements in record-keeping are required to be able to demonstrate that residents' expectations are being managed consistently. Implementation of additional functionality to the Council's Housing Management System is planned in order to facilitate this.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	No	This does not happen consistently; Housing Complaint Handling Procedures are to be updated to ensure that complaint handlers have regard to this best practice.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	The Customer Feedback Policy has been updated to clarify that customers may have a representative deal with a complaint on their behalf, or be represented or accompanied at any meeting where this is reasonable..
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	No	This requirement will be considered as part of the review of Complaint Handling Procedures.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	No	This requirement will be considered as part of the review of Complaint Handling Procedures.

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	No	While this is generally happening in practice, improvements in record-keeping are required to be able to demonstrate that residents are kept regularly updated about the progress of the investigation. Implementation of additional functionality to the Council's Housing Management System is planned in order to facilitate this in the longer term, and alternative interim solutions are to be investigated.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Complainants are surveyed on their complaints transaction, but response rates are minimal and therefore little insight is gained. A question on complaint handling has been included in the 2022/23 tenant perception survey and will be included in all future annual tenant perception surveys, in line with regulatory requirements.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	No	This requirement will be considered in the review of Complaints Analysis Procedures (see also Code Section 7).
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	The Unacceptable Behaviour Policy (Appendix 3) sets out that restrictions may include that "other suitable options will be considered in the light of the customer's circumstances or additional needs". This Policy was subject to an Equality Impact Assessment prior to implementation.

Section 5 – Complaint stages

Stage 1

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	The Customer Feedback Policy sets out a corporate timescale of 15 days to respond to Stage 1 complaints and has been updated to set out that Stage 1 complaints from Council tenants will be responded to within 10 days, in line with the Code. The Policy also sets out that where a complaint is complex and cannot be responded to within the defined timescales then the customer will be kept fully informed.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	No	Complaint responses are generally sent to the complainant when the answer to the complaint is known, and not when the outstanding actions required to address the issue are completed. However, outstanding actions are not consistently recorded or monitored, and regular updates are not consistently provided to the resident. Implementation of additional functionality to the Council’s Housing Management System is planned in order to facilitate this in the longer term, and alternative interim solutions are to be investigated, and expanded resourcing in the Customer Service team will be deployed to support this.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	No	Adherence to these requirements is inconsistent across Housing & Property Services. Complaint handling refresher training is planned to be delivered, to ensure that complaint handlers continue to have the appropriate skills and maintain awareness of complaint handling requirements and best practice. Expanded resourcing in the Customer Service team will enable additional quality checking of complaint responses.

5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	No	<p>Adherence to these requirements is inconsistent across Housing & Property Services. Complaint handling refresher training is planned to be delivered, to ensure that complaint handlers continue to have the appropriate skills and maintain awareness of complaint handling requirements and best practice. Expanded resourcing in the Customer Service team will enable additional quality checking of complaint responses.</p>
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Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	<p>If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.</p>	Yes	<p>The Customer Feedback Policy sets out that where a complaint is complex and cannot be responded to within the defined timescales then the customer will be kept fully informed and has been updated to clarify that agreement will be sought from the complainant on a suitable extension time.</p>
5.3	<p>Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response.</p>	Yes	<p>The Customer Feedback Policy has been updated to make clear that the Housing Ombudsman’s details will be provided to the complainant where agreement over an extension period cannot be reached, so the customer can be supported in challenging the Council’s decision.</p>
5.4	<p>Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.</p>	No	<p>This is not currently undertaken as standard but will be considered as part of the Complaint Handling Procedures review.</p>
5.7	<p>Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.</p>	Yes	<p>The Customer Feedback Policy has been updated to clarify the approach to be taken to additional complaints raised during the investigation, aligned with these requirements. Complaint handling refresher training is planned to be delivered, to ensure a consistent approach is taken by all complaint handlers.</p>

Stage 2

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident’s satisfaction at stage one it must be progressed to stage two of the landlord’s procedure unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident’s right to approach the Ombudsman about its decision.	Yes	No requests to escalate a complaint about Housing or Property Services have been refused since before 2019/20.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	No	If any aspect of the complaint is unclear, then clarification is sought, but a full definition is not agreed between both parties. Stage 2 acknowledgements are issued centrally by the Senior CSA who administers the policy, but current capacity does not allow for these requirements to be fulfilled. Therefore, expanded resourcing in the Customer Service team will be deployed to support this.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	The Customer Feedback Policy sets out that customers can request Stage 2 once Stage 1 outcome determined and this is consistently confirmed through the stage 1 responses.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are considered by the Assistant Director for Corporate and Community Services.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	The Customer Feedback Policy sets out a corporate timescale of 15 days to respond to Stage 2 complaints, and Housing & Property Services aim to respond to Stage 2 complaints within this timescale. The Policy also sets out that where a complaint is complex and cannot be responded to within the defined timescales then the customer will be kept fully informed.

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	<p>Stage 2 responses contain all information required in Code Section 5.16. Recent responses have been subject to random quality checks to confirm this.</p>
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Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	<p>If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.</p>	No	<p>The Customer Feedback Policy sets out that where a complaint is complex and cannot be responded to within the defined timescales then the customer will be kept fully informed, and has been updated to clarify that agreement will be sought from the complainant on a suitable extension time..</p>
5.15	<p>Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response.</p>	No	<p>The Customer Feedback Policy has been updated to make clear that the Housing Ombudsman’s details will be provided to the complainant where agreement over an extension period cannot be reached, so the customer can be supported in challenging the Council’s decision.</p>

Stage 3

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	The Customer Feedback Policy has been updated to remove the optional third stage of the complaints process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	The Customer Feedback Policy has been updated to remove the optional third stage of the complaints process, therefore not required.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	The Customer Feedback Policy has been updated to remove the optional third stage of the complaints process..

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	The Customer Feedback Policy has been updated to remove the optional third stage of the complaints process.
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Section 6 – Putting things right

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	The Customer Feedback Policy outlines this, and complaint handlers are guided to ensure all considerations listed in Code Section 6.1 are considered in the assessment of the complaint.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	No	Generally, the remedies offered reflect the extent of service failures and detriment caused to the resident, but additional monitoring of remedies offered is required to assure that they are deliverable and do not cause unfairness to other residents.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	No	Additional monitoring of remedies offered is required to assure that they are clearly communicated in line with the requirements of Code Section 6.5, and are followed through to completion.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	These provisions are set out in the Discretionary Payments to Tenants Policy, which is currently subject to review.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents.	No	Additional internal monitoring of complaints and remedies offered should enable more detailed analysis of complaint trends, which in turn should highlight systemic issues to be investigated further
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	The Customer Feedback Policy has been updated (subject to approval) to clarify that where possible, the Council will consider whether it is able to offer a resolution through the complaints process by obtaining legal advice on those complaints that have a legal remedy.

Section 7 – Continuous learning and improvement

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutiny panels.	No	Learning and improvements from complaints are reported to residents in the Annual Report and through social media but are not consistently reported to staff and scrutiny panels. Improvements to Reporting and Assurance are planned to be implemented from April 2023 onwards, with a dedicated resource within Housing & Property Services assigned to oversee this.

Best practice “should” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	No	Improvements to Reporting and Assurance, to be implemented from April 2023 onwards, include a proposal to appoint a member of Executive Board to have lead responsibility for complaints to support a positive complaint handling culture.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies The implementation of management responses should be tracked to ensure they are delivered to agreed timescales 	No	Complaint handling data are reported to Audit Committee, but not Executive Board or the Council. The Complaint Handling Code self-assessment is reported to Executive Board. Improvements to Reporting and Assurance, to be implemented from April 2023 onwards, will include a regular report to be considered by both the Tenant Liaison Panel and Executive Board, that will include all requirements of Code Section 7.4.

	<ul style="list-style-type: none"> The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	No	Improvements to Reporting and Assurance, to be implemented from April 2023 onwards, will include a report on themes and trends, to be considered by the Departmental Management Team, and Corporate Management Team, to identify any potential systemic issues that need to be addressed.
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	This will be considered alongside proposals for amending the Council's Employee Development process within Housing & Property Services, to align with the CIH Professional Standards framework and any future competency requirements.

Section 8 – Self-assessment and compliance

Mandatory “must” requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	An Annual self-assessment is/will be undertaken by the Housing Regulatory Assurance team.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This self-assessment has been carried out in response to both changes in the Complaint Handling Code, and the partial restructure undertaken in Housing & Property Services in June 2022.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	No	<p>Self-assessments are reported to elected members, following which they are published on our website, and communicated via social media.</p> <p>The self-assessment was not included in the most recent Annual Report but will be included in all future annual reports.</p>