

## 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	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	<p>This policy is available on our website on our website – <a href="#">Complaints and Feedback Policy</a></p> <p>There is a one-word difference between the HO's definition of a complaint and our definition:</p> <p>The HO definition uses the word 'landlord' whereas SDC's policy uses the word 'organisation'.</p>	<p>Stroud District Council have a corporate Complaints and Feedback Policy, which covers complaints by both the LGSCO and the HO. In this policy, we define a complaint as:</p> <p>'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 or group of individuals.'</p>
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes		<p>We will try to resolve all expressions of dissatisfaction straight away, where possible, unless this is clearly a complaint and if so, this will be registered as a complaint and logged for investigation.</p> <p>The Council's Complaints and Feedback Policy contains a section on "Using support to make a complaint or give feedback". It</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>advises that residents may ask a third party or representative to help them provided the resident's explicit consent is given for them to support the resident with their enquiry.</p>
1.4	<p>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.</p>	Yes		<p>Our Complaints and Feedback Policy explains that wherever possible, we will try to put things right through our normal services – this is defined as a service request and forms part our Complaints Procedure.</p> <p>Service requests are recorded, monitored and reviewed in the same way that our complaints are handled.</p>
1.5	<p>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.</p>	Yes		<p>Our Complaints Procedure explains that if we cannot confidently fix the issue as part of our normal services, or the request meets the complaints definition, we will begin an investigation into the complaint by following our Stage 1 process.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.6	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.	Yes	<p>Our surveys have a closing statement that reads:</p> <p>“Thank you for taking the time to answer this survey, your feedback is important to us. As part of our continuing effort to improve our services to you, we rely on feedback from our community. We will analyse survey responses to help us understand how our repairs/lettings/ASB service is performing and where we can improve based on your feedback.</p> <p>We want to know when we get it right so that standards can be maintained or improved, but we also want to know when things don’t go well, so we can learn, improve and develop the services we provide to you. If you wish to leave a compliment or pursue a complaint about the service, please visit our website:</p>	<p>All of the surveys we produce have a statement on them advising of how residents can pursue a complaint should they wish to do so.</p> <p>The Council host café conversations and resident engagement events. During these events residents are provided with detail about how to compliment or complain.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<a href="https://www.stroud.gov.uk/complaints">https://www.stroud.gov.uk/complaints</a> ”	

## 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	During 2023-24, all complaints were accepted and investigated under our complaints procedure. No complaints were refused.	<p>Our Complaints and Feedback Policy explains that we can decide to not treat something as a complaint if it is not valid. If we decide to not accept a complaint, we will give the resident a detailed explanation why and what their options are in a response.</p> <p>Where we have followed our policies and regulations correctly, but there is a different of opinion, including policy disagreements, it is unlikely to be treated as a complaint.</p>
2.2	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	Yes		<p>See Section 2.1.</p> <p>Our Complaints and Feedback Policy explains that it is unlikely we will accept feedback that is over 12 months old as it can be impractical or impossible to</p>

	<p>residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			<p>effectively investigate and form a fair conclusion. In exceptional cases, individual circumstances will be considered and we will inform the resident if we believe we can investigate the matter raised.</p> <p>What we can deal with and our exceptions are outlined in this policy.</p>
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		<p>All complaints are accepted unless the matter being raised is not covered under the Council's Complaints and Feedback Policy. We ask residents that in general, making a complaint should be done as quickly as possible, as it is unlikely that we will accept feedback that is over 12 months old as it can be impractical or impossible to effectively investigate and form a fair conclusion.</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</p>	Yes	<p>During 2023-24, no complaints were refused to be accepted under the</p>	<p>If the resident's dissatisfaction falls outside of our Complaints Procedure, or if it is not valid, we will write to them giving them a detailed explanation as to</p>

	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.		complaints procedure.	why such a decision was made and what their options are.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		<p>Our Complaints and Feedback Policy explains that however the complaint is managed, we will make sure our understanding of the complaint, what is expected as an outcome and the actions that will be taken are explained to the resident.</p> <p>Each complaint will be dealt with on its own merits and reviewed in an impartial manner.</p>

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and	Yes	During 2023-24, complaints submitted via email direct to Housing Services is the most popular way that residents contact	<p>Complaints can be made through any of our contact channels:</p> <ul style="list-style-type: none"> <li>• On-line</li> <li>• Email</li> <li>• Phone</li> <li>• Post</li> </ul>

	reasonable adjustments of residents who may need to access the complaints process.		<p>us, followed by complaints submitted online using the corporate complaints form.</p> <p>These two communication channels make up 86% of the way customers contact us about complaints:</p> <p>Email: 89  Online: 82  Letter: 12  Phone: 9  Face to Face: 8</p>	<ul style="list-style-type: none"> <li>• Text</li> <li>• Face to Face</li> <li>• Social Media</li> </ul> <p>Our Complaints and Feedback Policy contains a section on Equality Monitoring, as part of ensuring that we are providing an equitable service to all of our customers. We may ask if the enquiry is related to any of the protected equality characteristics. Providing this information is voluntary, but we encourage this as it helps us assess if we are reaching all of our residents, that our services are appropriate for everyone's needs, and that any shortfalls are investigated and resolved.</p> <p>If a resident does not have access to the internet, we will print and send a copy of the complaints policy to them.</p> <p>Stroud District Council also works in partnership with an external company (<a href="#">Prime Production Ltd</a>) who offer an interpretation and translation service, including BSL.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be	Partially	All of our complaint case files and monitoring logs are	Residents are able to raise their complaints through a range of contact



	<p>aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>		<p>kept in a shared folder, which all staff have access to.</p> <p>A note is placed on our Housing Management System once a complaint is received and registered, so that all staff are aware.</p> <p>All complaint handlers are given training on our complaints process, and are sent links to documents and websites that will assist them in their case handling.</p> <p>We are developing our housing management system, so that complaints will be tracked through our new customer services module.</p> <p>Housing Services are currently improving</p>	<p>channels and directly with any member of staff.</p> <p>All staff are aware of the complaints process and what they should do if they receive a complaint.</p> <p>Team meetings have a standard agenda item of complaints on them, and learning outcomes are discussed as part of ongoing service improvements.</p> <p>We monitor the Housing Ombudsman website and circulate details of any opportunities for attending training/webinars/e-learning to our complaint handlers.</p>
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			<p>how we communicate with our staff to ensure that everyone is aware of our complaints policy and the Complaint Handling Code, and what to do if they receive a complaint. For new starters, this will form part of their service induction plan.</p>	
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>	Yes	<p>TSM results for 2023-24 show that per 1,000 properties, Stroud District Council had 31.44 complaints, which is between the average and lower quartile for organisations of a similar size.</p>	<p>We actively promote a positive culture to complaint handling and staff are encouraged to advise residents of our complaints process when they are dealing with cases where there has been a service failure. We welcome feedback from our residents and use it to shape and improve the future delivery of our services.</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	<p>Our <a href="#">website</a> provides the ability for customers to:</p> <ul style="list-style-type: none"> <li>• select a language of their choice;</li> </ul>	<p>See Section 3.1.</p> <p>Our Complaints and Feedback Policy and procedure sets out how residents can provide feedback and what we do with it, and this available on our website.</p>

			<ul style="list-style-type: none"> <li>• increase or decrease the size of the font; and</li> <li>• switch the colour themes</li> </ul>	It also contains detailed information on both our Stage 1 and Stage 2 processes and the relevant time frames for responding. It also provides details on how to contact the relevant Ombudsman.
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		<p>Policy explains that we follow the LGSCO and the Housing Ombudsman’s Complaint Handling Code and provides a hyperlink to the code on the Ombudsman’s website.</p> <p>It also provides details on how to contact the relevant Ombudsman.</p>
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		Our Complaints and Feedback Policy contains a section on “Using support to make a complaint or give feedback”. It advises that residents may ask a third party or representative to help them provided the resident’s explicit consent is given for them to support the resident with their enquiry.
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		Complainants are advised of their right to access the Housing Ombudsman service at any point during the complaints process. This is outlined in both the Stage 1 and Stage 2 response letter templates.

				Our Complaints and Feedback Policy contains a section on 'Ombudsman Services'. Residents are given details of how to contact the relevant Ombudsman as part of their complaint if it reaches Stage 2. The contact details for each Ombudsman are also outlined in this policy.
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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		<p>Housing Services have a Housing Quality Assurance Team. Part of their role is to manage the complaint handling process for the service, including liaison with the Ombudsman.</p> <p>Quarterly and annual performance reports are produced, which are shared with the senior management team and our performance Members.</p> <p>The Housing Quality Assurance team send an email weekly to the complaint handlers reminding to update the status</p>

				of their complaints and ensure timely responses.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes		<p>Housing Services have a number of staff who are dedicated complaint handlers and who investigate and respond to complaints at both Stage 1 and Stage 2.</p> <p>The Housing Quality Assurance team have the authority and autonomy to act to resolve disputes and will escalate any concerns to senior management for action where appropriate.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Partially	<p>Housing Services are currently improving how we communicate with our staff to ensure that everyone is aware of our complaints policy and the Complaint Handling Code.</p> <p>As part of these, we will ensure that we carry out more shared learning, analyse more case studies and as a result of feedback</p>	<p>Complaint handlers are required to undertake regular training in relation to handling complaints, and any changes to the complaint handling code or our policies are communicated.</p> <p>Complaints and learning outcomes are regularly discussed at team meetings</p>

			received, make changes to our services.	
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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		Stroud District Council have a single Complaints and Feedback Policy which sets out how residents can provide feedback and what we do with it. Our complaints procedure is clear about what a complainant can expect and this is supported by our corporate Service Standards.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes		<p>Our Complaints and Feedback Policy explains that before things become a complaint, wherever possible, we will try to put things right through our normal services. We define this as a 'service request' – a request that the organisation provides or improves a service, fixes a problem or reconsiders a decision.</p> <p>When a complaint is made, depending on the situation, we'll deal with it in one of two ways:</p>

				<p>If a resident contacts us to say something has gone wrong and we are confident we can fix the issue as part of our normal services, we will let them know right away what will happen and when the matter will be resolved.</p> <p>If a resident contacts us and we cannot confidently fix the issue as part of our normal services, or the request meets the complaints definition, we will begin an investigation into the complaint by following our Stage 1 process.</p> <p>We do not have an informal complaint or Stage 0 stage in our complaints policy.</p>
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		<p>If a resident contacts us and we cannot confidently fix the issue as part of our normal services, or the request meets the complaints definition, we will begin an investigation into the complaint by following our Stage 1 process.</p> <p>If after the Stage 1 process, the resident is dissatisfied with our decision, they can escalate their</p>

				<p>complaint to Stage 2 within one month of the Stage 1 decision.</p> <p>Our complaints policy does not have more than 2 stages.</p>
5.4	<p>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.</p>	Yes		<p>Residents will only go through one complaint process. Stage 1 complaints are handled by officers within Housing Services and not a third party.</p> <p>Stage 2 complaints are peer reviewed and considered by a manager from a different service area to the service that dealt with the Stage 1 complaint. The peer review ensures an impartial assessment is made by someone unrelated to the service area for fairness and scrutiny.</p>
5.5	<p>Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.</p>	Yes		<p>As per Section 5.4.</p> <p>Managers reviewing Stage 2 complaints are made aware of the complaints process and the Housing Ombudsman's Complaint Handling Code to ensure compliance is maintained.</p>
5.6	<p>When a complaint is logged at Stage 1 or escalated to Stage 2, landlords</p>	Yes		<p>During both Stage 1 and Stage 2 complaints processes, residents will</p>



	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.			be contacted and we will explain what we understand the complaint to be, discuss what they would expect as the outcome, and we will ask for more information if needed.
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		When acknowledging a complaint at either Stage 1 or Stage 2, we will outline the aspects of the complaint we will investigate and ask for clarification where this is not clear.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes		<p>Service managers will decide, based on all the evidence and information presented, whether the facts of the case have been determined.</p> <p>No complaints are investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter.</p> <p>All complaints received are dealt with confidentially and processed under UK Data Protection legislation.</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree	Yes		We aim to provide a written decision to the complainant within the timescales set out in the Complaint

	with the resident suitable intervals for keeping them informed about their complaint.			Handling Code. Where this is not possible, we will be clear about the reasons why and arrange further contact at intervals agreed between the complainant and us until the complaint is resolved.
5.10	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.	Yes	<p>As part of our sign-up process, we capture information on any disabilities/vulnerabilities that the resident may have, and these are recorded on our housing management system.</p> <p>We are also in the process of working on a Tenant Census to ensure that we are capturing and updating information on our residents that will help us deliver our services.</p> <p>If a resident informs us of a disability/vulnerability, we will make any reasonable adjustments as required. For example, if someone</p>	Our Complaints and Feedback Policy explains that we want to ensure that we are providing an equitable service to all of our customers. As part of our complaints process, we may ask residents if their enquiry is related to any of the protected equality characteristics. Providing this information is voluntary, but we encourage this as it helps us assess if we are reaching all of our residents, that our services are appropriate for everyone's needs and that any shortfalls are investigated and resolved.

			has a visual impairment, we can utilise the services of Prime Production, who provide translation and interpretation services.	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	During 2023-24, one complaint was refused to be escalated to Stage 2 as the Stage 1 complaint was still open and within timescale, and the response had not yet been issued.	Complaints will always be escalated through all stages of our complaints procedure unless there are valid reasons not to do so. If we decide not to accept a complaint, we will give the resident a detailed explanation why and what their options are in a response.  What we can and cannot deal with under the Complaints and Feedback policy is clearly laid out within the policy.
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		All formal complaints and correspondence are logged on our housing management system. Individual case files are created on receipt of a complaint, which include the original complaint, all correspondence with the resident and other parties, relevant supporting documentation and our final written decision letter.

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		<p>However a complaint is managed, we will make sure we explain our understanding of the complaint, what the resident expects as an outcome, and agree between us the actions that will be taken. At all stages, we will ensure any parties related to the complaint have adequate opportunity to comment before a final decision is made.</p> <p>If a valid complaint has no prospect of resolution, such as where it is demanding actions that the Council cannot take, we may refer the complainant to an Ombudsman service without completing all stages of this complaint process.</p>
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5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes		<p>Our Complaints and Feedback Policy has a dedicated section on Unacceptable Behaviour. It explains that we understand that when things go wrong, it can often be personal and emotional.</p> <p>We will respect and listen to the feedback to resolve the resident's concerns; however we will not accept any threatening, abusive or persistently vexatious behaviour made towards anyone involved with the Council.</p> <p>Likewise, we expect anyone working for the Council and Councillors to treat residents with respect.</p> <p>We have a dedicated <a href="#">Unacceptable Behaviour Policy</a> on our website which explains how we will manage unacceptable behaviour across our services.</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes		<p>During 2023-24, one individual was registered as a vexatious complainant. Prior to restricting contact with the Council, an assessment was made on their individual circumstances to determine whether this action is proportionate and considered the</p>

				Equality Act. Prior to any restrictions, a warning was made first to give the person an opportunity to change the acceptable behaviour.
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## 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		<p>Before any form of dissatisfaction becomes a complaint, wherever possible we will try to put things right through our normal services.</p> <p>When a complaint is received, we will record the complaint in our complaints system. The complaint will be allocated to the relevant service or, where a complaint involves multiple services, our contact centre will make it clear which service will lead the complaint and co-ordinate the response.</p> <p>A written response to the complaint will be issued in line with the timescales set out in the Complaint Handling Code. Where this is not possible, we aim to agree an</p>

				extension and will be clear about the reasons why and arrange further contact at intervals, agreed between the complainant and us, until the complaint is resolved.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received</u></b> .	Yes	During 2023-24, 171 Stage 1 complaints were received and 100% were acknowledged within 5 working days.	Stage 1 complaints are acknowledged, defined and logged within 5 working days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	During 2023-24, 85% of complaints were responded to within the complaint handling code timescale.	We aim to provide a written decision to the complainant within 10 working days of the complaint being acknowledged.
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.	Partially	During 2023-24, 29% of Stage 1 complaints that were extended exceeded an additional 10 working days, as set out in the complaint handling code.  Housing Services have addressed this with their staff, and a reminder to comply with the Code has been issued. Any staff failing to comply will be required to	Where it is not possible to provide a written decision to the complainant within 10 working days, we will be clear about the reasons why and arrange further contact at intervals agreed by the resident and us, until the complaint is resolved.  Extensions will not exceed 10 working days without good reason.

			undertake additional training and the matter will be raised as part of the Council's performance framework.	
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		We have a template set up for officers to use if they are investigating a complaint that requires an extension to the timescales. This template includes the contact details of the Housing Ombudsman.



6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		<p>When responding to a complaint, our written decision will include:</p> <ul style="list-style-type: none"> <li>• The original complaint.</li> <li>• The steps we have taken to investigate the complaint.</li> <li>• What we have considered (applicable laws, policies, best practice).</li> <li>• Our decision and the reasons for it.</li> <li>• What will happen next (any actions to be taken) and the timescales to do it.</li> <li>• Any lessons learned and changes we will make following the complaint.</li> <li>• How the resident can escalate the complaint if they remain dissatisfied.</li> <li>• Confirmation of what stage the complaint was handled at.</li> </ul> <p>Although a complaint may have been responded to, complaint handlers are required to ensure that any outstanding actions are followed through and to keep the resident updated accordingly.</p>
6.7	Landlords must address all points raised in the complaint definition and	Yes		As per Section 6.6 above.

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes		<p>Any additional complaints received during the investigation, which are related to the original complaint, are incorporated into the Stage 1 complaint.</p> <p>As part of the Stage 1 investigation, the complainant is contacted and given an opportunity to explain and expand on the complaint so that a full and thorough response can be given, ensuring all related elements have been considered.</p> <p>If these complaints are unrelated to the issues already being investigated, these are logged as a new complaint.</p>
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> </ul>	Yes		<p>When responding to a complaint, our written decision will include:</p> <ul style="list-style-type: none"> <li>• The original complaint.</li> <li>• The steps we have taken to investigate the complaint.</li> </ul>

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			<ul style="list-style-type: none"> <li>• What we have considered (applicable laws, policies, best practice).</li> <li>• Our decision and the reasons for it.</li> <li>• What will happen next (any actions to be taken) and the timescales to do it.</li> <li>• Any lessons learned and changes we will make following the complaint.</li> <li>• How the resident can escalate the complaint if they remain dissatisfied.</li> <li>• Confirmation of what stage the complaint was handled.</li> </ul>
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## 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		Our Complaints and Feedback Policy explains that if after the Stage 1 process, the resident is dissatisfied with our decision, they can escalate their complaint to Stage 2 within one month of our Stage 1 decision. If they request escalation after this time the Council may require them to start the complaints process again.

				At Stage 2 we will review the stage 1 response and assess whether we have robustly investigated the complaint and responded appropriately. If after Stage 2 the resident is still dissatisfied, they may have the right to escalate their complaint to the Ombudsman.
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6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	During 2023-24, 24 Stage 2 complaints were received and 100% were acknowledged within 5 working days.	Stage 2 complaints are acknowledged, defined and logged within 5 working days of the complaint being received.
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		<p>We will set out our understanding of the outstanding issues and the outcomes the resident has told us they are seeking, but we may ask for further clarification if any points are unclear.</p> <p>Complainants are provided with an opportunity to give any further information that they wish to as part of their Stage 2 complaint.</p>
6.13	The person considering the complaint at stage 2 must not be the same person	Yes		The Council have different officers who manage complaints at Stage 1

	that considered the complaint at stage 1.			<p>and Stage 2. The person carrying out the Stage 2 will not be considered by the same person that considered the Stage 1.</p> <p>A further investigation will be conducted and the decision, unchanged or amended, will be carried out by a manager in the service, not involved in the original complaint response. The decision at Stage 2 is peer reviewed and considered by a manager from a different service that dealt with the Stage 1 complaint.</p> <p>The peer review ensures an impartial assessment is made by someone unrelated to the service area for fairness and scrutiny.</p>
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	During 2023-24, there were 24 Stage 2 complaints received and 92% were responded to within the complaint handling time.	A final response to the Stage 2 complaint will generally be issued within 20 working days of the complaint being acknowledged, unless more time for consultation or investigation is required.
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	Partially	During 2023-24, 40% of Stage 2 complaints that were extended exceeded an additional	In exceptional circumstances, where more time is needed for consultation or investigation, we will be clear about the reasons why and arrange

	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.		10 working days, as set out in the complaint handling code.  Housing Services have addressed this with their staff, and a reminder to comply with the Code has been issued. Any staff failing to comply will be required to undertake additional training and the matter will be raised as part of the Council's performance framework	further contact at intervals agreed between the resident and us until the complaint is resolved.
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		We have a template set up for officers to use if they are investigating a complaint that requires an extension to the timescales. This template includes the contact details of the Housing Ombudsman.
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		When responding to a complaint, our written decision will include: <ul style="list-style-type: none"> <li>• The original complaint.</li> <li>• The steps we have taken to investigate the complaint.</li> </ul>

				<ul style="list-style-type: none"> <li>• What we have considered (applicable laws, policies, best practice).</li> <li>• Our decision and the reasons for it.</li> <li>• What will happen next (any actions to be taken) and the timescales to do it.</li> <li>• Any lessons learned and changes we will make following the complaint.</li> <li>• Confirmation that the complaint was handled at Stage 2.</li> <li>• How to escalate the matter to the Ombudsman if they remain dissatisfied.</li> </ul> <p>Complaints are responded to as soon as the answer is known. Although a complaint may have been responded to, complaint handlers are required to ensure that any outstanding actions are followed through and to keep the resident updated accordingly.</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		As per Section 6.17.

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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol>	Yes		<p>When responding to a complaint, our written decision will include:</p> <ul style="list-style-type: none"> <li>• The original complaint.</li> <li>• The steps we have taken to investigate the complaint.</li> <li>• What we have considered (applicable laws, policies, best practice).</li> <li>• Our decision and the reasons for it.</li> <li>• What will happen next (any actions to be taken) and the timescales to do it.</li> <li>• Any lessons learned and changes we will make following the complaint.</li> <li>• Confirmation that the complaint was handled at Stage 2.</li> <li>• How to escalate the matter to the Ombudsman if they remain dissatisfied.</li> </ul>
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		<p>Stage 2 is the last stage of our internal complaints process and involves all relevant parties required to issue the response.</p>



## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	During 2023-24, 95 complaint responses acknowledged that something had gone wrong and the complaint was upheld.	<p>Housing Services have a template which gives guidance to the complaint handling officer on what to include in their final response. This includes:</p> <ul style="list-style-type: none"> <li>• A summary of the complaint and the outcomes the complainant is seeking as a resolution to their complaint.</li> <li>• Outlining the steps taken to review the complaint.</li> <li>• Presenting their findings and conclusions for each element of the complaint.</li> <li>• Offering apologies and explanations for any service failure.</li> <li>• Outlining next steps or follow up action to be taken.</li> <li>• Issuing compensation or gestures of goodwill if appropriate, in line with our compensation policy.</li> <li>• Learning outcomes – explaining what we have learnt from the complaint and what changes and improvements will be put in place</li> </ul>

				<p>(e.g. improving work practices and procedures).</p> <ul style="list-style-type: none"> <li>• Signposting, if appropriate, to other services or sources of advice and support.</li> </ul>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	During 2023-24, £9,624.84 was awarded in compensation.	Our compensation policy recognises that sometimes an apology is not enough and some residents have the right to compensation when things go wrong. Our policy ensures that fair and consistent remedies are taken in these circumstances and covers both Statutory and Discretionary compensation.
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		<p>Complaint handling officers are required to diarise any follow up actions to ensure these are completed within the agreed timescales.</p> <p>In relation to compensation, the resident is asked to complete and sign a Compensation Agreement form, which provides their bank details so that the payment can be issued. Once received, the payment is raised and a copy of the remittance advice is kept within the complaints case file.</p>

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		All staff have access to the Housing Ombudsman's website and the Complaint Handling Code, which assists them when considering on appropriate remedies for putting things right.
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### Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ol style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> </ol>	Yes		<p>A self-assessment against the Complaint Handling Code is carried out annually.</p> <p>Analysis reports on our complaint handling performance are produced quarterly and annually and are shared with our senior management team and performance Members. These reports include:</p> <ul style="list-style-type: none"> <li>• a summary of the types of complaints we may have refused to accept.</li> <li>• any findings of non-compliance with the Complaint Handling Code.</li> <li>• servicing improvements made as a result of the learning from complaints.</li> </ul>

	<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>			<ul style="list-style-type: none"> <li>any reports from the Ombudsman on our performance.</li> <li>any other reports or publications produced by the Ombudsman in relation to our complaints.</li> </ul>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes		<p>Our annual complaints performance and service improvement report is discussed with the Chair and Vice-Chair of Housing Committee as well as the Committee's performance monitors.</p> <p>The 2023-24 self-assessment will be presented to our Housing Committee for approval and for our governing body's response. This will be published, along with a copy of the self-assessment and our Members' response to the report.</p>
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes		<p>The self-assessment will be reviewed following any significant restructure, merger and/or change in procedures. This is monitored by the Housing Quality Assurance Team.</p>
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes		<p>Any review or update of the self-assessment following an Ombudsman investigation will be</p>

				carried out by the Housing Quality Assurance Team.
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		Should there be any occasions where disruption to our complaints process causes us to be unable to comply with the Complaint Handling Code, our Housing Quality Assurance Team will ensure that the Ombudsman and our affected residents are notified, and our website updated accordingly.

### 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		The Housing Quality Assurance Team produce quarterly complaints reports and dashboards which are presented to and scrutinised by the housing teams "Improvement Group" led by senior officers. The group will consider trends and whether service delivery needs to change in response to any learning.

9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes		<p>Complaints are a standing agenda item for all housing team meetings to ensure awareness of complaint handling and to lead to a positive complaint handling culture where the team are committed to doing the best for our residents.</p> <p>Case studies from complaints will be produced during 2024-25 and shared during team meetings as a method of demonstrating why a positive culture is important.</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes		<p>Complaints are shared with senior housing staff as part of the Improvement Group. Complaints also feature in our resident engagement work and the context of the complaint will be scrutinised as part of our residents sounding boards and scrutiny panels.</p> <p>Performance on complaints is presented as part of the Council's performance framework that is heard at each Housing Committee meeting.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to	Yes		The Strategic Head of Housing is responsible for complaint handling, alongside the Head of Tenant Relationships and Head of Asset &

	identify potential systemic issues, serious risks, or policies and procedures that require revision.			Investment who will take ownership for complaint handling in their respective areas of the team. These accountable officers are members of the Improvement Group and will assess trends and issues as part of this and wider work.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		The Council are in the process of setting up a Housing Oversight Board which is an officer and member led group focusing on the Housing Service. The MRC will be the Chair of Housing Committee, supported by the Vice-Chair.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes		The MRC will receive performance reports, including on complaint and complaint handling, as part of the Housing Oversight Board before every Housing Committee meeting.  The Strategic Head of Housing, the MRC and Vice-Chair meet regularly (minimum twice per month) during which issues, including complaints, are discussed.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes		A performance report on complaints is shared with the MRC and Vice-Chair, as well as members of the

	<ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>			<p>Housing Oversight Board, including tenant representatives.</p> <p>This report feeds into the Housing Committee reports heard at each meeting and includes:</p> <ul style="list-style-type: none"> <li>a. regular updates on volume, categories and outcomes</li> <li>b. trends</li> <li>c. ombudsman cases</li> <li>d. annual and quarterly reports</li> </ul>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes		<p>The Council have a performance framework and within the objectives of the complaint handlers in the team, they have an objective for complaint handling that is to positively approach and resolve complaints without blaming others and remaining professional and collaborative.</p>



