

London Borough of Hillingdon

Housing Ombudsman Complaint Code - Self-Assessment

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 Further improvements being considered	Similar wording is used in the LBH Corporate Complaints Policy and Procedure but not exactly the same. There is a need to incorporate reference to 'those acting on the Council's behalf'. A number of minor amendments have been identified as necessary in the Council's Corporate Complaints Policy and Procedure and this will be addressed as part of this review process.
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	It is not necessary to use the specific word 'complaint'. The Corporate Complaints Policy and Procedure review process will include consideration of whether any additional text needs to be added.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our complaints procedure includes the following text "We will always try to resolve enquiries/concerns by way of 'service requests' by talking through problems with you, without the need to go through our formal complaints procedure. We will aim to put things right and give you a timescale when we will respond to you, detailing the action we have taken. If we are unable to resolve the complaint to your satisfaction then we will tell you how to proceed within the formal complaint procedure which is outlined below." Three stage process to be reviewed in April 2024

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	The Policy and Procedure includes the following text: “If we consider that a complainant is unreasonable or unreasonably persistent, we will refer the matter to a senior manager, who will consider whether further investigation of the complaint will be carried out.” As part of the Corporate Complaints Policy and Procedure review process an additional reference will be added to our Unreasonably Persistent Complainant Policy
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 Complaints Policy includes the following text: “We will not deal with issues through the complaint procedure where a claim has been made in a court such as a disrepair claim” As part of the Corporate Complaints Policy and Procedure review this wording will be reviewed in light of the requirements of the Local Government Ombudsman and the Housing Ombudsman.
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	In practice a letter is sent if a complaint is not accepted. As part of the Corporate Complaints Policy and Procedure review process additional text will be added to reflect this.

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	The Council makes a distinction between a service request and a complaint.
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 complain if they wish to.	Yes	The Council recognises that survey responses may contain a ‘complaint’. We ensure that appropriate signposting to the complaints service takes place and also raise awareness of how to complain while conducting surveys.

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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 can be made in person, by telephone, in writing, via our website or email.
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 but further improvements being considered	Current practice is being addressed to ensure that the Complaints Policy and Procedure sufficiently promoted and is available in a clear and accessible format for all residents
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 complaints page is easy to find on the website and provides information on how to complain. Complaints - Hillingdon Council
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 but further improvements being considered	In practice this already takes place. Arrangements are being made for it to be explicitly referenced in the complaints policy As part of the Corporate Complaints Policy and Procedure review process this will be made explicit.

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.	No Further work is underway in this area	Current practice is being addressed to sufficiently 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.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No Further work is underway in this area	Work is underway to sufficiently publicise the Ombudsman Service. Provision of contact information for the Ombudsman and early advice about residents' rights to access the Housing Ombudsman Service to residents are mandatory
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	Signposting is included on documentation sent in relation to complaints

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	In practice if a complaint is made via social media it will be accepted and if there is a need for further detail this will be requested

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	We have a corporate complaint handling team and a complaint manager responsible for processing complaints and providing advice and guidance to staff. An annual complaint report is provided for the Finance and Corporate Services Select Committee. The report contains information about complaints, compliments and Members Enquiries submitted.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	We have a Corporate complaint handling team that is responsible for processing complaints, providing advice and guidance, delivering training sessions for officers across the Council and in attending management meetings to provide information and advice on the handling of complaints.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <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	

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 .	Yes	<p>The Council's Corporate complaint procedure has an informal Stage (Service Request) by talking through problems with a complainant, without the need to go through our formal complaints procedure. We will aim to put things right and give the complainant a timescale when we will respond to him/her, detailing the action we have taken. If this does not work, we will register it as a formal complaint and an acknowledgment will be sent within 3 working days. Informal complaints is considered to be the 'pre-complaints' stage. At no time does the service seek to 'prevent' the resident from accessing the formal complaints process.</p> <p>Removal of informal complaints and timeframes to be reviewed April 2024.</p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	We will acknowledge receipt within 3 working days and inform the complainant of the reference number, who will be investigating, when they can expect a response to be sent to them, etc. If anything is unclear we will always ask for clarification before beginning the investigation.

			Timeframes to be reviewed April 2024.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	At Stage 1, it will be investigated by a Head of Service or the appropriate manager, from the service complained about but who was not directly involved in the reason for the complaint.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	These principles are adhered to
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	The Council's Corporate complaints procedure sets out the procedure we will follow and this includes timelines that we will aim to meet. If there is going to be a delay in responding we will always write to a complainant and let them know and when they can expect a response.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	All residents and all staff complained of will either be interviewed or spoken to or ask for written response that will be considered as part of the investigation.

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is set out in the Council's Corporate complaints procedure.
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	The Council's Corporate complaints policy and procedure sets out our 3 Stage complaint procedure. However, the procedure is flexible in that it allows Officers to escalate a complaint direct from Stages 1 and/or 2 to the Ombudsman in cases where the decision is unlikely to be overturned at the next stage i.e. where it is a challenge of our application of a policy such as the Social Housing Allocation Policy. Where the Investigating Officer wishes to offer escalation to the Ombudsman from Stages 1 and/or 2, they have been requested to discuss this first with the Complaint Manager before doing so. We will decline complaints where there is ongoing litigation or the incident complained of is more than 12 months old. Three stage process to be reviewed April 2024.
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	All information relating to the complaint is held on our complaint recording system called GOSS.
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 Council has a "Unreasonable or Unreasonably Persistent Complainants Policy" in managing unacceptable behaviour.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations	Yes	The Council's Corporate complaints procedure sets out what

	from the outset, being clear where a desired outcome is unreasonable or unrealistic		we can investigate, what we cannot, the remedies that we can offer, etc.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We will always try to resolve a complaint as quickly as possible and that is our stated aim. Officers adhere to policy timescales and engage with complainant and/or their representatives to resolve quicker where possible.
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	We are happy for a complainant to be represented but they will need to have the appropriate consent form so that we can divulge information to them and not breach the General Data Protection Requirements. We also have the ability to make a best interest decision to accept something as a complaint for an advocate.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This is our practice
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We are required to comply with the General Data Protection Regulations
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We will always acknowledge receipt of a complaint and if more time is required we will advise a complainant of this.
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.	No Work is underway to address this	We have introduced a new complaint recording system that will enable us to do this more easily.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	Staff dealing with complaints have the opportunity to attend training courses, they are also supported by the complaint team who will provide advice and guidance throughout the investigatory process. Complaint reports is provided which will include learning.
4.19	Any restrictions placed on a residents' contact due	Yes	This is set out in the 'Unreasonable or Unreasonably

	to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.		Persistent Complainants Policy” and where someone is placed on the Restricted Persons Register (RPR, they are informed of the reason, how long they are on the RPR, how they can appeal it, etc. The Corporate Complaints Policy and Procedure review process will include consideration of specific reference to the Equality Act 2010.
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Section 5 - Complaint stages

Mandatory ‘must’ requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	
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	This is set out in the Council’s Corporate Complaints Procedure
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 Further work is underway in this area	A response is sent to the resident when the answer to a complaint is known, however tracking of outstanding actions needs to be embedded in practice.
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.	Yes	All points of a complaint are responded to.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	This is set out in the Council’s Corporate Complaints Procedure

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	<p>This is set out in the Council's Corporate Complaints Procedure. We will usually not offer an escalation where it is our application of policy, such as the Council's Social Housing Allocation Policy, where a escalation to Stages 2 and/or 3 will not change the decision. However, where the Investigating Officer wishes to offer escalation to the Ombudsman from Stages 1 and/or 2, it has been requested that they contact the complaint manager for advice and his agreement for them to follow this course of action. Complaint responses do contain information on how to escalate their complaint, and if to the Ombudsman it will provide them with the Ombudsman/s contact details.</p> <p>Three stage process to be reviewed April 2024</p>
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	If a complaint is not clear we will always write to a complainant for clarification.
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	We will always make sure that a response has been provided at Stage 1 before escalating to Stage 2.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is set out in the Council's Corporate Complaints Procedure, where Stage 2 is investigated and responded to by a Director.
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	Yes	The Council will always aim to respond to Stage 2 complaints within 10 working days. If this target is not going to be met, we will contact the complainant and tell them the

	should not exceed a further 10 days without good reason.		new date by which they can expect the response. Timescales to be reviewed April 2024
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two 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 thing right • details of any outstanding actions and <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 sate, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	This is set out in the Council's Corporate Complaints Procedure

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have a 3 stage Corporate complaints procedure but it has the flexibility to allow for escalation from Stages 1 and/or 2 to the Ombudsman. Significant change to this procedure, such as the removal of a Stage requires Cabinet approval. This procedure was last reviewed in 2015 and it involved external stakeholders including an Assistant Ombudsman from the Local Government and Social Care Ombudsman where the issue of the number of stages was considered by the Select Committee and Cabinet. The decision was that our 3 Stage Corporate complaints procedure remain

			in place but it gave officers the flexibility not to use all 3 stages in cases where the decision is unlikely to be changed if it escalated higher i.e. our application of a policy. Three stage process to be reviewed April 2024.
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	This is set out in the Council's Corporate Complaints Procedure

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	There are very few complaints that exceed the 20 working day target. Where a complaint is complex and it seems likely that additional time will be required, the complaint manager will make early contact with the complainant to explain why a delay is expected. Agreement to this will be sought but if this does not prove to be possible, the option to escalate the complaint will remain.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for	Yes	This has not been an issue for the Council but we will always tell a complainant the contact details of the Ombudsman if they

	responding and/or the proposed timeliness of a landlord's response.		ask us for this information. Additional work is underway publicise the Housing Ombudsman Service.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Older complaints for the same or similar issue will be considered
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	We will always allow complainants to add to their complaint but it may mean it takes us slightly longer to complete our investigation and if this is the case we will tell the complainant.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	There are very few complaints that exceed the 20 working day target. Where a complaint is complex and it seems likely that additional time will be required, the complaint manager will make early contact with the complainant to explain why a delay is expected. Agreement to this will be sought but if this does not prove to be possible, the option to escalate the complaint will remain.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This has not been an issue for the Council but we will always tell a complainant the contact details of the Ombudsman if they ask us for this information. Additional work is underway publicise the Housing Ombudsman Service.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	We have a 15 working day target at Stage 3.
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.	No	This has not been an issue for the Council but we will always tell a complainant the contact details of the Ombudsman if they ask us for this information.

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 complaint response will acknowledge that an error has occurred and what we are going to do to put this right. This is set out in the Council's Corporate Complaints Procedure
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	This is set out in the Council's Corporate Complaints Procedure
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is set out in the Council's Corporate Complaints Procedure
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	We will look at the complaint in a holistic way and offer a complaint fair and proportionate redress. Please see the Council's Corporate Complaints Procedure

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Once a complaint has been responded to, officers will identify any learning and set out what has gone wrong and what is being done to put this right.
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	<p>This is handled on a case by case basis. The pursuance of a legal entitlement will not as a matter of course prevent resolution being sought through the complaints process.</p> <p>In some instances, this could mean payments being made on a 'without prejudice' basis in recognition of disruption and/or inconvenience to the resident without necessarily accepting any legal liability. Where appropriate, legal advice will be obtained.</p>

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 Work is underway on this issue	<p>There is a corporate annual complaint report to the Select Committees which sets out volumes of complaints recorded but also the outcomes and what we are doing to address areas of weakness.</p> <p>A new IT based system for complaints handling is being installed which will enable much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	<p>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.</p>	Yes	<p>The complaint team are part of the Corporate Director for Central Services and he reports in to the Corporate Management Team which comprises of all the very senior managers in the Council. The Business Manager for complaints will undertake presentations at CMT and also other committees across the Council.</p> <p>The Corporate Director of Place has lead responsibility for complaints with delegation to the Director of Housing and the Director of Operational Assets as appropriate.</p> <p>Complaints handling and learning will be reported to Landlord Board quarterly and to the relevant Cabinet Member annually at a minimum and more often if considered necessary.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	No Work is underway on this issue	<p>The Business Manager for complaints provides quarterly and annual reports.</p> <p>A new IT based system for complaints handling is being installed which will enable much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements</p>
	Any themes or trends should be assessed by senior management	No Work is	Quarterly and annual corporate reports show themes and what action was taken to

7.5	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.	underway on this issue	address them. A new IT based system for complaints handling is being installed which will enable much more flexible and comprehensive reporting. This will increase the extent to which the council is able to learn from complaints, share the learning and institute improvements Complaints handling and learning will be reported to Landlord Board quarterly and to the relevant Cabinet Member annually at a minimum and more often if considered necessary.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <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. 	Yes	Objectives are set for staff in their PADA's The Councils Customer Service Standards also contain much of this information as does the Corporate Complaints Procedure. This expectation is embedded in the CIH Professional Standards that the Housing Management Service are in the process of rolling out.

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	Most recent review January 2024
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A self-assessment will be completed in these circumstances

<p>8.3</p>	<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 	<p>Yes</p>	<p>The annual complaint report to the Select Committees will set out the complaint information for the past year and the impact of factors such as Covid on complaints.</p> <p>The Housing Landlord Service will separately complete and publish an self-assessment annually. This will be reported to the Cabinet Member.</p>
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