



## Complaint Handling Code - Self Assessment - June 2023

Kirklees Homes and Neighbourhoods have carried out an extensive review of our complaints handling process. We published our updated Complaints Handling Policy in September 2022 to ensure we have a customer focused, effective and fair complaints process in place that is compliance with the Housing Ombudsman Service Complaint Handling Code. We are also committed to delivering improvements in complaint handling to ensure the voice of the customer is heard. As an organisation we are committed to providing excellent services to our customers and increasing satisfaction through continuous learning and improvements

### Section 1 - Definition of a Complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: <i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	The Housing Ombudsman definition has been adopted in the new <a href="#">Homes and Neighbourhoods Complaints Policy</a> implemented in September 2022
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	Our policy states that a complaint is identified as an expression of dissatisfaction with a service, and so a customer does not need to state 'complaint' for the matter to be logged as a complaint.



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			The policy references accepting complaints from customers and their advocates.
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	<p>All staff have been advised of the standard definition of a service request and a complaint. If an issue requires an investigation or further enquiries, then it is logged as a complaint.</p> <p>Staff are asked to seek advice from the Customer Experience Team if they are in any doubt.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>All complaints are accepted unless it relates to any of the reasons which are set out in section 3 of the Policy.</p> <p>The policy is used as a guide to determine when an issue will not be logged as a formal complaint. Where a complaint has not been accepted, the reason why will be provided in writing to the customer.</p>
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	Yes, please see point 1.7 above.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	There have been limited occasions where we have refused to accept a complaint. However, where this does occur it is now standard practice to provide an explanation in writing to the customer.

### Section 1 - Definition of a Complaint

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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	<p>The Customer Experience Team is clear on the difference between a 'service request' and a complaint. Service requests are generally dealt with by the service involved and are not directed to the Customer Experience Team.</p> <p>Where service requests are received by the Customer Experience Team these are directed to the appropriate service.</p> <p>Service requests are logged on our complaints handling IT system as</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			'capture' which is what they are called in the system.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	No	<p>Surveys are carried out across the organisation by different teams. Any expressions of dissatisfaction identified through our annual STAR / TSM survey are passed onto Homes and Neighbourhoods by the researcher undertaking the survey.</p> <p>No evidence to confirm this is happening across H&amp;N. However, all teams have now attended the complaints training and are aware that any expression of dissatisfaction should be logged with CET.</p>



## Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>Our <a href="#">Homes and Neighbourhoods Complaints Policy</a> outlines the variety of methods in which a complaint can be made.</p> <p>Customers can log a complaint by telephone, in writing (letter and email), online feedback/complaints form and through a Cllr/MP/friend or advocate, social media, or any HN officer.</p> <p>Improvements have been made to the website to allow customers to contact us via this route, and the majority of the enquiries received are through the website.</p>
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	Our <a href="#">Homes and Neighbourhoods Complaints Policy</a> is available on the Council website and sent to customers via email or post when requested.
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 <a href="#">Homes and Neighbourhoods complaints and compliments</a> webpage provides details of what is a complaint and guidance on how to log a complaint, with a link to an online form to raise a complaint.



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	Reasonable adjustments and accessibility are detailed in our Policy in line with the Council's Inclusion and Diversity Strategy.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>Complaints information is included in newsletters. The <a href="#">Homes and Neighbourhoods complaints and compliments</a> webpage includes details of the Ombudsman scheme and links to the Complaint Handling Code. All correspondence at each stage of the complaints process includes the Ombudsman's details and information about the scheme. Our annual report includes a section about complaints.</p> <p>Further work is needed to publicise our complaints policy in other regular publications and correspondence.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No	All correspondence in relation to complaints at each stage of the process includes the Ombudsman details.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			Further work is required to ensure the Ombudsman details as included as part of any regular/general correspondence with residents.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	The Ombudsman contact details are included on the website and in all standard letter templates used at all stages of the complaint process. The acknowledgment letter sent at the start of each stage of the complaint process includes an information leaflet about the Ombudsman Service.

## Section 2 - Accessibility and awareness

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	The policy details the routes customers can use to make a complaint and this includes social media. Complaints received via social media are forwarded to the Customer Experience Team (CET) by the Communications Team. The customer is then contacted directly by CET staff in line with the complaints policy and process.

### 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	<p>A Customer Experience Service Manager manages and oversees the complaints handling within Kirklees Homes and Neighbourhoods.</p> <p>They lead a dedicated Customer Experience Team (CET) who are responsible for logging all complaints within Homes &amp; Neighbourhoods.</p> <p>The CET Services Manager provides quarterly reports to the Council's Governing Body representative and other governance structures within the Council</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Complaint handlers are senior managers within the organisation, Stage 1 General Manager Level and Stage 2 Service Manager level. All managers have attended training and been provided with a copy of the handbook and policy and are clear on their responsibility in handling complaints.



### Section 3 - Complaint handling personnel

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"><li>• be able to act sensitively and fairly</li><li>• be trained to handle complaints and deal with distressed and upset residents</li><li>• have access to staff at all levels to facilitate quick resolution of complaints</li><li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li></ul>	Yes	<p>All managers and leaders have been trained in complaints handling, and provided with clear guidance on how this should be approached and what is expected in line with this Code and our service excellence principles.</p> <p>The Customer Experience Service Manager liaises regularly with managers and provides ongoing support and guidance where appropriate to ensure complaints are handled fairly and in line with policy and procedure.</p>





## 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	Initial contact is made with the customer by the Customer Experience Team (CET) to confirm the details of the complaint, and ensure the customer is clear on the process. Where the issue can be resolved quickly as a service request, this is communicated to the customer to ensure they are satisfied with the approach. Due to current volumes of enquiries received and the capacity of CET, it can take up to 4 working days to log and acknowledge a complaint.
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	The CET contact the customer on receipt of a complaint to discuss and confirm the details of the complaint and the expected outcome, this allows the team to explain the complaints process and timescales to manage customer expectations.  The acknowledgement letter is sent to confirm the details agreed to give the customer the opportunity to inform CET if there is anything that needs to be



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			amended before the investigation begins.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>Services and teams make their own internal arrangements to ensure complaints are investigated and a response drafted in line with the Complaints Handling Policy.</p> <p>General Managers and Service Managers maintain overall accountability and they review and sign off the detail of the investigation / response to ensure impartiality is maintained.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter</li> </ul>	Yes	All Managers across H&N have attended training. All responses are confirmed by General Managers and Service Managers can be further checked by the CET to ensure an appropriate investigation and response has been provided.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	The customers preferred method of contact and frequency is confirmed at the first contact and this information

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			included on the complaint form sent to the investigating manager.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made</li> </ul>	Yes	Supported by HR, Investigating Managers discuss complaints against staff with the person involved, to allow them to provide information and comment on the findings before a final response is provided to the complainant.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The policy states that customers have 10 working days to request that the complaint is escalated to stage 2.
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	Reasons for not accepting a complaint are set out in our policy. Where we have refused to escalate a complaint based on these reasons this has been formally communicated to the customer in a letter
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	Complaints are referred to our Customer Experience Team who will log all complaints on our system, this includes the complaint, date received, the assigned Manager, and the outcome of the investigation and all correspondence with the complainant.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			This is then saved on our complaints IT system.
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	Our policy includes a section on unacceptable behaviour and reference is made to tackle any unacceptable behaviour through the Council's Reasonable Behaviour Policy.

#### Section 4 - Complaint handling principles

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	All customers are contacted on receipt of a complaint by the CET to explain the process, timescales and to manage expectations in relation to outcomes expected.
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	The Customer Experience Team will speak to the complainant and try and resolve the complaint at the point of contact and action any urgent issues. However, if further investigation is required this is logged on the system and assigned to a manager within the relevant service area.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			<p>Training provided to Managers highlighted the importance of early resolution and offering suitable remedy to resolve the complaint.</p>
4.5	<p>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.</p>	Yes	<p>Our Policy states:</p> <p>'that we are committed to ensuring that our complaints process is accessible to all and can offer help and support to ensure any concerns from customers or their advocates are listened to and understood. Complainants can also seek assistance through external agencies, for example Citizens Advice'.</p> <p>Customers may prefer to have a representative deal with their complaint on their behalf, and to be represented and/or accompanied at any meeting with Homes and Neighbourhoods. This may be by an advocate, carer, family member, elected member, agency, or professional body. Where this is the case, we must receive or hold a signed authority from the customer which authorises us to communicate</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			with their appointed advocate or representative.
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	Where a complaint is related to a legal obligation, advice will be sought from the Kirklees Legal Team. This will allow the legal obligations of both parties to be clearly communicated to the customer.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Names of individual officers will only be added where it is relevant to the investigation. In most cases the job role/position of the member of staff will be given in correspondence.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	No	Good communication was a key element of the training delivered to managers.  Further communication with Managers in relation to the importance of discussing the complaint with the customer and keeping them updated on progress is required to further improve the customer experience.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	A text survey has been in place since November 2022. A text is sent to all complainants 10 days after the complaint is closed. Satisfaction with

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			the overall complaints process is currently 45.5%
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	The training rolled out to all teams in relation to complaints and service excellence included guidance on implementing ongoing conversations and reviews of complaints in team meetings and one to one's to identify good practice, recognise areas of learning and discuss improvements in service delivery.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our policy includes a section on unacceptable behaviour and reference is made to tackle any unacceptable behaviour through the Council's Reasonable Behaviour Policy.

## Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear	Yes	We aim to respond to stage 1 complaints within 10 working days.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
	timeframe for when the response will be received. This should not exceed a further 10 days without good reason.		The process in place ensures that all extensions are agreed with the customer and a letter sent to confirm the reason for the extension and the new response deadline. Clear guidance has been provided to all investigating Managers. The process of extension is overseen by the CET to ensure consistency and appropriateness of extensions.
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.	Yes	Investigating managers understand the importance of providing the response to the complaint as soon as possible, and they have implemented systems and processes to track and monitor actions to ensure completion.
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	<p>Stage 1 and Stage 2 letters are bullet pointed to provide the complainant with an answer to each individual point raised in the acknowledgement letter. These are then transferred over to the response letter, where we use standard letter templates.</p> <p>The processes in place for reviewing and confirming response letters ensures all elements are addressed.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stages</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	Letter templates ensure we have a consistent approach to providing responses and to ensure all the relevant information is included in all responses.



## Section 5 - Complaint stages

### Mandatory 'must' requirements 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	All customers are informed of the right to approach the Ombudsman at each stage of the process. Where customers express dissatisfaction with an element or all of the stage 1 response this is escalated to stage 2. The reasons for escalation are clearly stated in the acknowledgement letter, to clarify with the customer which elements of the original complaint are to be considered at stage 2.
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	A further acknowledgement letter is sent to the customer to confirm the outstanding issues and reason for escalation. If necessary, the CET will contact the customer to confirm the details.
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	A formal response is provided for all Stage 1 complaints. Any request from the customer to escalate prior to the formal response being provided will be postponed until the response has been provided. CET ask the customer to confirm which element of the Stage 1 they remain dissatisfied with before escalating to Stage 2.



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	The allocation and escalation route for complaints ensures that the stage 2 complaint is investigated by a manager in a more senior role than the manager at stage 1.
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	We aim to respond to stage 2 complaints within 20 working days.  The process in place ensures that all extensions are agreed with the customer and a letter sent to confirm the reason for the extension and the new response deadline. Clear guidance has been provided to all investigating Managers. The process of extension is overseen by the CET to ensure consistency and appropriateness of extensions

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stages</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right • details of any outstanding actions <b>and</b></li> <li>if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	Letter templates ensure we have a consistent approach to providing responses and to ensure all the relevant information is included in all responses.

### Section 5 - Complaint stages

Mandatory 'must' requirements 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 operate a 2 stage complaints process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stages</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	Yes	We do not operate a 3-stage process.

## Section 5 - Complaint stages

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	The process in place ensures that all extensions are agreed with the customer and a letter sent to confirm the reason for the extension and the new response deadline. Clear guidance has been provided to all investigating Managers. The process of extension is overseen by the Customer Experience Team (CET) to ensure consistency and appropriateness of extensions.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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 responding and/or the proposed timeliness of a landlord's response.	Yes	Where an agreement over an extension cannot be reached, these are referred to the Customer Experience Service Manager to offer advice and guidance and refer the customer to the Ombudsman.
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	<p>All history is considered in each individual case.</p> <p>The CET have had a consistent process of recording complaints for over 12 months, this allows us to provide historical information to investigating managers were appropriate/relevant to ensure this is considered as part of the complaint.</p>
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	<p>Where additional issues are raised by the customer following the complaint being logged, these are considered on a case-by-case basis to minimise the delay in providing a response and any confusion for the customer.</p> <p>Where possible, additional issues are added to the ongoing complaint.</p> <p>Where the issue(s) relate to a different service area or are completely</p>



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			<p>unrelated to the original complaint, a second complaint will be logged.</p> <p>The CET aim to capture all issues in 1 complaint where possible.</p>

### Section 5 - Complaint stages

Best practice 'should' requirements 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	Clear guidance has been provided to all managers as a briefing note. Any extensions are recorded by CET and a confirmation letter sent to the customer.
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	Where an agreement over an extension cannot be reached, these are referred to the Customer Experience Service Manager to offer advice and guidance and refer the customer to the Ombudsman





## Section 5 - Complaint stages

Best practice 'should' requirements Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b><u>within 20 working days</u></b> 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 do not operate a 3-stage process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We do not operate a 3-stage process.



## 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	This was a key element of training delivered to all managers which will be updated and repeated in 2024.  The letter template provides a guide for investigating managers to ensure all elements of the complaint are addressed in the response including any follow up actions.
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	Our Redress Policy ensures consistency and provides clear guidelines in relation to offering compensation. All compensation offers are confirmed with the Customer Experience Services Manager or Team Manager.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	No	All managers across H&N received training which included information on appropriate remedies to be offered to resolve a complaint. Training will be updated and repeated during 2024. The Redress Policy is also in place to provide clear and consistent guidelines in offering remedies, this is



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			<p>further supported by the Staff Handbook.</p> <p>We have evidence of complaints relating to scheme and batched works where we are unable to provide clear timescales when works will be completed, which leads to further dissatisfaction and possible escalation to stage 2.</p>
6.6	<p>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.</p>	Yes	<p>The Redress Policy provides clear guidelines on when and in which circumstances compensation will be paid. We have also, where appropriate paid compensation to prevent the customer having to undergo the lengthy insurance claim process, to achieve an early resolution.</p>



## Section 6 - Putting things right

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 need to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Individual service areas take responsibility for reviewing and identifying learning from complaints.  At the end of Quarter 4 2022/23 all service areas provided details of learning from complaints and service improvements to be implemented.
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	Processes have been implemented to ensure Legal are involved in any cases that have a disrepair or legal element to ensure the complaint response is appropriate and seeks to resolve the matter without the need for formal legal action.





## 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	<p>A quarterly programme of performance reporting is in place. This is reported to the Senior Management Team (SMT), the Council's Cabinet Portfolio Holder for Democracy and Housing and the Tenants Advisory and Grants Panel.</p> <p>At the end of Quarter 4 2022/23 all service areas provided details of learning from complaints and service improvements to be implemented as part of the above performance reporting cycle.</p> <p>A service specific report is also provided to all Heads of Service quarterly which can be shared with staff.</p> <p>Our annual report includes a section about complaints.</p> <p>Further development is needed to increase the information available to customers via the website and other channels.</p>



## Section 7 - Continuous learning and improvement

### 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 Portfolio Holder for Democracy and Housing has lead responsibility for complaints on behalf of the Council's Cabinet.</p> <p>Quarterly reports are provided to the Portfolio Holder. In addition, they receive reports on any cases of maladministration found by the Housing Ombudsman along with learning.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• 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</li> </ul>	Yes	<p>Quarterly reports are provided to SMT, the Portfolio Holder and our Tenant Advisory and Grants Panel. These reports include updates on complaint volumes, performance, learning, compliance with maladministration orders and updates on self-assessments.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
	annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Themes and trends are identified and reported to SMT on a quarterly basis, to allow managers to review and action any areas of improvement required. This information is also shared with teams so that all staff are aware.
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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	No	This has been identified as an action to progress.

## 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	A self-assessment is completed annually or following a significant change in procedures.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A self-assessment is completed annually or following a significant change in procedures.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	The current self-assessment is on the website and reported to the Cabinet Portfolio Holder in their role as governing body lead for complaints.  The self-assessment will be included in the annual report for 2022/23.