

Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

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> | No | BCC Complaints Policy Chapter 3 Our definition of a complaint is: <i>A complaint is an expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response.</i> This is in line with the Local Government and Social Care Ombudsman's guidance . We include information about the Housing Ombudsman in our Complaints Policy, along with their definition of a complaint. |
| 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 | BCC Complaints Policy Chapter 5.1 |
| 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 | If a resident requests that an issue raised as part of survey feedback is dealt with as a complaint, we would do this. |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | BCC Complaints Policy Chapter 6 |

| | | | |
|------------|--|-----|---|
| | | | <p>In the 2021-2022 financial year, 31 of the 1480 complaints received were rejected for the following reasons:</p> <ul style="list-style-type: none"> • Complaint not for this organisation – 7 cases • Complaint outside of complaints procedure – 2 cases • Customer refused to provide a name or address – 16 cases • Duplicate complaint – 5 cases • Representative not authorised to act on behalf of client – 1 case |
| 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 | <p>BCC Complaints Policy Chapter 6</p> <p>We exclude on the following grounds, which we consider to be fair and reasonable:</p> <ul style="list-style-type: none"> • time limits • illegal activity • court proceedings • negligence claims • right of appeal • complaints about data • complaints against elected members or the elected Mayor • policy decisions • complaints about schools • complaints from professionals or external contractors • complaints from staff • unreasonable complainant behaviour • statutory complaints about adult services |
| 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. | No | <p>Bristol City Council Complaints Policy Chapter 6</p> <p>If the Customer Relations Team considers that a complaint is not appropriate to be dealt with under this procedure, the complainant will be informed of this in writing. The complainant will be given reasons and, where applicable,</p> |

| | | | |
|--|--|--|--|
| | | | <p>will be directed to the more appropriate means of addressing the issue they have raised.</p> <p>At present, our template rejection emails do provide reasons for the rejection, but we do not provide the Housing Ombudsman's details. The wording of our template is currently being reviewed.</p> |
|--|--|--|--|

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 | In the 2021-2022 financial year, we treated 581 of the 1480 complaints we received as service requests. |
| 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 | |

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 | <p>We accept complaints in person, over the telephone, by post, by email and through our website.</p> <p>Bristol City Council Housing Complaints and Feedback</p> <p>In the 2021-2022 financial year, 72.6% of complaints were received through our website, 27.1% by email and 0.4% by telephone.</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 | Bristol City Council Complaints Policy Chapter 13.1 Bristol City Council Guide to making a complaint |
| 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 | Bristol City Council Complaints procedures Bristol City Council Guide to making a complaint |
| 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 | Bristol City Council Housing Complaints and Feedback “Alternative formats For assistance with making a complaint or giving feedback in another language, braille, larger print or on audio tape, email complaints.feedback@bristol.gov.uk or use the above methods to get in touch. We can also arrange language interpreters and sign-language interpreters.” |
| 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 | We don't currently have any posters in communal blocks, but this is planned for later in 2022. However, we do publicise information in leaflets, newsletters, online, in our annual report and as part of correspondence with tenants and leaseholders. |
| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | All new tenants receive information about the Ombudsman in their welcome packs. Tenants will also receive Ombudsman information with their rent statements and leaseholders will receive Ombudsman information with their service charge statements. |
| 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 | Information about the Housing Ombudsman is provided in both our Stage 1 and Stage 2 complaint responses. |

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 | Bristol City Council Complaints Policy Chapter 12.1.3 |

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 specialist Customer Relations Team who triage and assign all complaints at Stage 1 and who personally respond to all Stage 2 complaints. We also have a dedicated customer experience analyst who works closely with the Customer Relations Team and provides information to senior management and the governing body. |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |

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 | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |

| | | | |
|--|--|--|--|
| | <ul style="list-style-type: none"> have the authority and autonomy to act to resolve disputes quickly and fairly. | | |
|--|--|--|--|

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 | We have a two stage complaints procedure and complaints are logged and acknowledged within three working days. |
| 4.2 | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | No | <p>Our complaints system, used by all services within the Council, sends automated complaint acknowledgments which do not contain this bespoke information. Removing the automation of this acknowledgment cannot be done on a service-specific basis, so removal across the entire Council would create unreasonable additional manual work for our Customer Relations Team.</p> <p>Once a complaint has been allocated to a service team, the assigned officer will attempt to contact the resident, ideally by telephone, to discuss and clarify their complaint.</p> |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |
| 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 | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |

| | | | |
|-------------|---|-----|--|
| | <ul style="list-style-type: none"> 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. | | |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | Wherever possible, we use residents' preferred method of communication. Residents logging complaints using our web-form can choose between email, phone and post and can provide information on the best days/times to phone. |
| 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 | Before any final decision is made at Stage 2, residents (and any staff who are the subject of a complaint) have the opportunity to respond and/or challenge our Stage 1 response. |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | Bristol City Council Complaints Policy Chapter 13.2 "Requests to escalate should be made within 20 working days of the Stage 1 response being issued." |
| 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 | Bristol City Council Complaints Policy Chapter 13.2 "If, in the opinion of the reviewing officer, the Council's findings are unlikely to change, the complaint will not be investigated at Stage 2 but the complainant will be informed of the Council's decision and how to escalate their complaint to the relevant Ombudsman service." |
| 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 | We use a centralised complaints system to record, track and respond to complaints, with all information held within each case. |
| 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 | Bristol City Council Complaints Policy Chapter 6.12 Bristol City Council Complaints Policy Chapter 18 |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | No | We only respond to desired outcomes in our Stage 1 responses, not before. |
| 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 complete investigations and send responses as soon as we are able. In the 2021-2022 financial year, 25% of complaints were responded to in less than 5 working days. |
| 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 | Bristol City Council Complaints Policy Chapter 5.1 |
| 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 | |
| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Each case is taken on its own merits, with staff and contractors only being identified where this is deemed necessary. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | No | Whilst this does happen on some types of complaints, such as repairs for example where a survey may need to be carried out, generally residents won't hear from us about their complaint between them receiving the acknowledgement and our Stage 1 response. |
| 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 | All emailed Stage 1 and Stage 2 responses contain a simple one-click feedback survey, with more detailed questions able to be answered if the resident wishes to do so. In the 2021-2022 financial year, 75 residents provided an overall satisfaction rating on how we handled their case at Stage 1, with 38.7% rating us good or very good. |
| 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 | |

| | | | |
|-------------|---|-----|---|
| 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 | Any decisions to restrict a resident's ability to contact us are made by our Customer Relations Team in line with our published complaints policy. Bristol City Council Complaints Policy Chapter 18.2 |
|-------------|---|-----|---|

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 <u>within 10 working days</u> 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. | No | As a local authority with one complaints policy covering all services, we have a 15 working day response timeframe at Stage 1 of our complaints policy. Bristol City Council Complaints Policy Chapter 13.1 In the 2021-2022 financial year, we responded to 83.2% of Stage 1 complaints within 15 working days. The timeframe for responding was extended on 4% of Stage 1 complaints. |
| 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 | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |
| 5.6 | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |
| 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 | Yes | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. In the 2021-2022 financial year, we upheld 24% of Stage 1 complaints, partly upheld 26% of Stage 1 complaints and did not uphold 47% of Stage 1 complaints. The remaining 4% were withdrawn or resolved upon receipt. |

| | | | |
|--|---|--|--|
| | <ul style="list-style-type: none"> details of how to escalate the matter to stage two if the resident is not satisfied with the answer | | |
|--|---|--|--|

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 | Bristol City Council Complaints Policy Chapter 13.2 In the 2021-2022 financial year, 7.9% of cases were escalated to Stage 2 and a further 1% of cases escalated to the Ombudsman. |
| 5.10 | On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | No | As with our Stage 1 acknowledgments, escalation request acknowledgements do not set out our understanding of the issues, only the timescales for responding. However, once a Stage 2 complaint has been allocated to a Customer Relations Team officer, if they are unclear on what the resident is unhappy about, they will contact the resident to clarify before sending the Stage 2 response. |
| 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 | Bristol City Council Complaints Policy Chapter 13.2 |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | Bristol City Council Complaints Policy Chapter 13.2 Our Stage 1 complaints are investigated by and responded to by officers within the specific landlord service teams. Stage 2 complaints are dealt with by specialist staff within our Customer Relations Team. |
| 5.13 | Landlords must respond to the stage two complaint <u>within 20 working days</u> 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 | Bristol City Council Complaints Policy Chapter 13.2 In the 2021-2022 financial year, we responded to 66.7% of Stage 2 complaints within 20 working days and extended the timeframe for responding on 14.1% of cases. |
| 5.16 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: | Yes | We do not have a third complaint stage. |

| | | | |
|--|--|--|---|
| | <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | | In the 2021-2022 financial year, we upheld 14% of Stage 2 complaints, partly upheld 28% of Stage 2 complaints and did not uphold 58% of Stage 2 complaints. |
|--|--|--|---|

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. | N/A | |
| 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 | N/A | |

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. | No | We have a process in place to notify residents of timeframe extensions, but we generally would not seek to agree this beforehand with the resident. |
| 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. | No | See comment at 5.2 above. |
| 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 | This is something that is done as part of our normal complaint investigation process. |
| 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 | |

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. | No | We have a process in place to notify residents of timeframe extensions, but we generally would not seek to agree this beforehand with the resident. |
| 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 | No | See comment at 5.14 above. |

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 <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. | N/A | |
| 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. | N/A | |

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 | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |
| 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 internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |
| 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 | Our internal complaint handling training, which is mandatory for all housing complaint handlers, covers this. |

| | | | |
|------------|---|-----|---|
| 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 | Any compensation payments are calculated and awarded in line with the Housing Ombudsman's guidance on remedies. |
|------------|---|-----|---|

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 | |
| 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 | |

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. | Yes | <p>With effect from September 2022</p> <p>As a result of complaints and feedback received and our 2021 self-assessment, we made the following improvements:</p> <ul style="list-style-type: none"> • we changed our process around carrying out repairs that may affect the validity of external wall insulation warranties • we changed our process around monitoring and reviewing of right to buy applications • we reviewed our mutual exchange policy with a view to streamlining the process • we provided training or refresher training to relevant staff and contractors on the following: |

| | | | |
|--|--|--|---|
| | | | <ul style="list-style-type: none"> ○ importance of recording any decisions and relevant contacts on case records ○ identifying homeless or at risk of homelessness cases ○ processing HomeChoice applications that may also be a homeless application ○ importance of, wherever possible, anonymising and summarising tenant complaints about contractors/partners before sending these to the contractor/partner ○ distinguishing between complaints and service requests ○ importance of checking all works have been completed by contractors/partners and not making assumptions ○ importance of considerate parking of Council vehicles so as not to cause obstructions or congestion ○ importance of accurate record keeping • we are now including details about how to complain and the Housing Ombudsman service in our annual service charge statements to leaseholders • we rolled out a mandatory training programme for all officers who handle housing complaints • we rolled out a quality audit programme, to identify areas for improvement in our processes, behaviours and training material • we have established a learning from complaints working group to workshop the best ways to capture and share lessons and obtain more feedback from residents |
|--|--|--|---|

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 7.3 | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance. | Yes | Councillor Tom Renhard, Cabinet Member for Housing Delivery and Homes, has been appointed to carry out this role |
| 7.4 | As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | Yes | With effect from October 2022 |
| 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 | |
| 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 | |

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 | Self-assessments against the previous version of the Complaint Handling Code were carried out and published on our website in December 2020 and December 2021. Most recent self-assessment |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | |
| 8.3 | Following each self-assessment, a landlord must: <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 | Yes | <ul style="list-style-type: none"> With effect from September 2022 Most recent self-assessment With effect from September 2022 |