

Section 1 - Definition of a complaint			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
1.2	A complaint must be defined as: '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	Yes	Our complaints policy was updated in September 2022. The definition is as follows: A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group.
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	<p>We do not insist on residents using the word complaint for a matter to be handled as a complaint and this is covered within our policy.</p> <p>"All customer complaints and compliments will be treated equally regardless of the method they are submitted, and customers do not have to use the word complaint for it to be treated as such." Any complaint submitted via a third party will be handled in line with our complaints policy and is stated within the policy.</p> <p>If a level of dissatisfaction is stated in any communication, it is logged as a complaint to ensure that the dissatisfaction is resolved, and the complainant receives a formal response to ensure closure to the situation reported.</p>
1.6	... if further enquiries are needed to resolve the matter, or if the	Yes	Our complaints policy defines a service request. Where there is then a repeated request for a service or where a resident raises

	resident requests it, the issue must be logged as a complaint.		<p>dissatisfaction with the response to their service request then this would be raised as a complaint.</p> <p>If no dissatisfaction is stated, then we will keep the enquiry at a service request stage. These are still tracked within the complaints & enquiries process. If at any stage during the service request process, a level of dissatisfaction is noted, we will escalate the enquiry into the complaints process.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	The council will accept all complaints unless the complaint falls within matters that cannot be dealt with under our complaints policy. Included at Appendix 1 in our 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	<p>The complaints policy at Appendix 1 details circumstances where a matter will not be considered under the policy.</p> <p>Anything that has an appeal process: issuing of parking tickets, a decision on a planning application, housing application scheme, an eviction decision, review of homelessness application, entitlement to housing benefit.</p>
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	Where the council does not accept a complaint, the customer will be provided with an explanation and of their right to take the decision to the Ombudsman. This is detailed within our complaints policy.

			In addition to this being stated within our policy, we also advise throughout the complaint process that a complainant can contact the Housing Ombudsman at any time within the complaints process to ensure full transparency and compliance with our own Complaints Policy and the Housing Ombudsman’s Complaint Handling Code.
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Best practice 'should' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	Our complaints policy sets out the difference between a request for service and a complaint. To support the policy and code requirements, the Housing Project Officer and our Infomanagement team monitor all complaints and enquires and ensure that there is an objective review of each submission into the complaint and enquiry process.
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.	Yes	Wording has been added to our surveys to highlight how customers can make a complaint if they are dissatisfied with the service received. When we receive survey feedback, and the officer analysing responses, deem a comment should be treated as a complaint, the survey response is sent to our housing complaints inbox for review and the concern will be progressed the same as any other communication channel.

Section 2 - Accessibility and awareness			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
2.1	<p>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.</p> <p>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.</p>	Yes	<p>Our complaints policy makes clear the different channels residents can complain by. Either by phone, e-mail, online form, in person or in writing.</p> <p>In addition to the policy stating the channels of communication, the housing complaints inbox has now been set-up and all staff are aware of its existence, a number of our complaint communications are sent from that inbox too, allowing external knowledge of its existence.</p> <p>Therefore, if any staff or representatives of the council come across any enquiry or complaint, they can be sent into that inbox for progression. The idea of setting up a separate inbox ensures that it can always be managed even if the Housing Project Officer is unavailable, it will be monitored.</p>
2.3	<p>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.</p>	Yes	<p>Our complaints policy is available on our website in an accessible format detailing how a complaint can be made, the number of stages involved and what will happen at each stage.</p> <p>All housing staff have had training in complaint management which will be repeated on a regular basis as new staff join; therefore, staff recognise the definition of a complaint and can submit complaints on a residents or service users' behalf.</p>

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	<p>Our complaints policy is available on our website and is available in a clear and accessible.</p> <p>If a complainant enters the word make a complaint in the Arun District Council website search engine, they will be taken to the complaints policy which allows complaint submissions.</p>
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	<p>The council has a corporate equality and diversity policy.</p> <p>Equality and Diversity is important to us, and we are committed to making sure that people are treated fairly and with dignity. Our aim is to remove unnecessary barriers for everyone who works for us or uses our services. All staff receive training on equality and diversity and will respond to any requests for reasonable adjustments in line with the Equality Act.</p> <p>All staff have attended mandatory Equality & Diversity Training to further expand EDI knowledge throughout the council, and all new recruits are put through the training as a mandatory requirement.</p> <p>Refresher training will be provided in due course.</p>
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>Residents are advised about the complaints process, Housing Ombudsman scheme and complaint handling code through various channels, including the website, in correspondence and in our newsletter.</p> <p>In addition, as we work through the complaints process with any</p>

			complainant, they are advised that they can approach the Housing Ombudsman at any time throughout the complaints process.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Residents are provided with contact information for the Ombudsman within our newsletter, on our website and in correspondence with them about complaints.
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 council's website includes information on complaints and the right to access the Housing Ombudsman Service, not only when the council's complaints process has been exhausted. Residents are informed within the complaint acknowledgement that they have the right to access the Housing Ombudsman service. Letter templates have been set-up, and all staff are encouraged to use them throughout the complaints process.

Best practice 'should' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	Any complaint received via social media will be dealt with in line with our complaints policy. "Any complaints made via our social media sites will be dealt with in line with this complaint policy, to protect confidentiality and privacy we will reply and ask you to message us directly with further details so that we can log your complaint. "

Section 3 - Complaint handling personnel			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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>Our Infomanagement team receive formal complaints and will then pass these over to the relevant service areas. Within each service area there are officers who will respond to complaints. The Housing Project officer tracks complaints to ensure they are given the necessary attention and responded to in the timescales prescribed.</p> <p>To ensure ongoing compliance with the complaint handling code requirements and adherence to our policy, we have added complaint coordination to the Housing Project Officer’s Job Description, to ensure that there is a single point of responsibility wherever possible. This ensures a consistency of complaint coordination and decision making, and each complaint is followed through to resolution.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>Complaint handlers are trained in complaint handling and the 2-stage process is in place to ensure that there is no conflict of interest.</p> <p>To ensure continued compliance with the complaint handling code training has been provided to staff on the complaints policy and a process implemented in housing to ensure it is consistently applied.</p> <p>The addition of the housing complaints inbox has further ensured</p>

			<p>that no complaints are missed or lost within the housing service. It also ensures transparency, further supporting the need of no conflicts of interest, as several staff have access to the inbox to ensure that it is monitored during every working day.</p> <p>Complaints training and awareness of the code has also been included within the induction process for new Staff.</p>
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Best practice 'should' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly. • be trained to handle complaints and deal with distressed and upset residents. • have access to staff at all levels to facilitate quick resolution of complaints. • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>The council's complaints policy makes clear what a complainant can expect from the nominated person dealing with the complaint.</p> <p>Act independently and have an open mind.</p> <p>Take measures to address any actual or perceived conflict of interest Consider all relevant information and evidence carefully.</p> <p>Keep the complaint confidential as far as possible with information only disclosed if necessary to properly investigate the matter. All housing staff have recently undertaken the free Housing Ombudsman training.</p> <p>To ensure continued compliance with the complaint handling code we will establish an ongoing training programme for complaint handlers.</p>

			To further enhance our compliance, the Housing Project Officer ensures the officer responsible for the complaint continues to monitor any actions set out within the complaint response.
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Section 4 - Complaint handling principles			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	The council does not have any extra/pre named stages such as stage '0'. All complaints are handled in line with our 2-stage process and are acknowledged within five days of receipt.
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	All acknowledgements include the name and contact details of the complaint handler, our understanding of the complaint and the outcomes the customer is seeking and a date or timeframe by which they can expect to receive a response. If any aspect of the complaint is unclear, we will ask the resident for clarification. This is contained within our complaints policy
4.6	A complaint investigation must be conducted in an impartial	Yes	Staff who are the subject of the complaint will not be involved in the complaint investigation.

	manner.		In addition to this, if an officer has undertaken a complaint investigation at an earlier stage, or is mentioned within a complaint, an alternative investigating officer is assigned to complaint investigation.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind. • take measures to address any actual or perceived conflict of interest. • consider all information and evidence carefully. • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>The complaint policy sets out how the complaint handler will deal with the complaint, and includes all areas referred to in 4.7.</p> <p>Ongoing training for complaint handlers has been established to ensure adherence to the complaint handling code.</p> <p>In addition, the Housing Project Officer reviews all complaints and ensures adherence to the complaint handling code.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Where arrangements have been agreed with residents these will be adhered to and communicated to any staff who will be dealing with the complaint.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position. • comment on any adverse findings before a final decision is made. 	Yes	Staff members who are the subject of the complaint, will be interviewed as part of the complaint investigation. This allows them to confirm their thinking and decision making. The residents' position is confirmed at acknowledgement stage.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Timescales are confirmed within our complaints policy. This includes the timescales for escalating to stage 2.

			If complaints response times are extended, a clear reason is provided.
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	In appendix 1 of the complaints policy, we set out the circumstances in which a matter will not be considered under the complaints policy. The council does not unreasonably refuse to escalate complaints.
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 record our complaints via spreadsheets and record contacts on our housing management system. We are developing a new housing system with the aim of providing improved functionality and efficiency. All emails relating to the complaint are stored within the housing complaints inbox, and when the complaint is completed, all emails relating to the complaint and the investigation process is uploaded to our document management system, this ensures a full audit trail should the complaint escalate further.
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 an unreasonable behaviour policy.

Best practice 'should' requirements
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Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>Unrealistic outcomes are managed as and when received and are managed as part of the complaint acknowledgement and investigation.</p> <p>As part of our complaint response template, we have a section of outstanding actions, for example if a repair has not been completed within the complaint response time, we confirm what we still need to do to bring the complaint to a satisfactory conclusion.</p> <p>Complaints are set to monitoring if there are outstanding actions to complete, this ensures that we manage expectations and do what we said we would do.</p>
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	<p>Our complaint policy makes clear we will take action to put things right as quickly as possible. We aim to resolve all complaints at Stage 1.</p> <p>If we have not completed all items stated within the complaint, within the complaint response time, we will confirm next steps within our complaint response and the Housing Project Officer will monitor the complaint through to a conclusion.</p>
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	<p>Our complaints policy states how we will deal with complaints via a third party.</p> <p>We do require our complainants to provide us with a consent to share, this ensures compliance with GDPR.</p>

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	The complaint handler will clarify any legal obligations at acknowledgement stage and the complaint response will detail the council's obligations and the obligations of the resident.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Individuals will not be identified or named as part of the complaint process. Our template letters confirm that only job titles are referenced within complaint responses.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We aim to keep responses to all complaints within the timeframes set out within our policy. If it is known that timeframes cannot be met, the complaint handler will inform the complainant of this and confirm a clear reason for any delays encountered.
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	In April 2022 we set up a process for measuring satisfaction with complaint handling via transactional surveys that are sent out upon closure of a Complaint, which include a QR code to make this as accessible as possible.
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	We view complaints as a way to help us improve our standards and the quality of service provided. Staff are supported within the council and understand the value of learning from complaints. We also monitor complaint trends, for example we review root causes for complaints and look deeper into the service to understand if there are complaints caused by an organisational

			issue that can be resolved to try and prevent other residents encountering the same issues.
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	<p>Our unreasonable behaviour policy sets out the type of restrictions that could be put in place. Prior to any restrictions being put in place the residents will be given notice of their possible implementation and given the opportunity to amend their behaviour.</p> <p>Any decisions made around unreasonable behaviour are made with consultation of senior managers within the Housing Service and our Law and Governance team to ensure that we do not breach the Equality Act 2010.</p>

Section 5 - Complaint stages			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason	Yes	We aim to respond to complaints within 10 working days. If we need to extend the timescale this will be explained to the resident and a new timeframe given, this will not exceed a further 10 days without a very good reason.
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	This is stated within our complaint policy, outstanding actions will then be tracked, and updates provided to residents.

			A complaint is set to monitoring once a response is sent. The case will not be closed until all actions are completed.
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	This is standard practice. A standard letter template is in place to assist staff and ensure consistency in responses.
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 stages. • 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 standard practice. A standard letter template is in place to assist staff and ensure consistency in responses.

Stage 2			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	This is standard practice and complaints will be progressed to stage 2 of our complaints policy. Appendix 1 sets out the circumstances where a complaint would not be considered under the complaints policy.

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	When acknowledging the stage 2 complaint we will set out our understanding of the complaint and the outcomes the resident is seeking, if any aspect of the complaint is unclear we will ask for clarification. For objectivity and transparency, we ask our Infomanagement team to make decisions as to whether a Stage 2 process should be undertaken.
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	Complaints are only escalated to stage 2 once a stage 1 has been completed and at the request of the resident.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are dealt with by a senior officer independent of the original complaint.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	We always aim to respond within 20 working days. If we need to extend the timescale this will be explained to the resident and a new timeframe given, this will not exceed a further 10 days without good reason.
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 things right. • details of any outstanding actions and 	Yes	This is standard practice. A standard letter template is in place to assist staff and ensure consistency. Arun District Council does not have a stage 3 within its complaints policy.

	<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. 		
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Stage 3			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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.	Yes	The council operates a two-stage complaint process
5.2	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	Not applicable as the council operates a two-stage complaint process

Best practice 'should' requirements			
Stage 1			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
5.2	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	We aim to respond to complaints within the target timescales, if an extension is required this is confirmed to the resident and they are provided with an opportunity to consult should they disagree with the complaint extension request.
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	The details of the ombudsman would be provided in cases where we cannot reach an agreement. It is standard practice for complaints to be informed that they can contact the Housing Ombudsman at any point within the complaint process.
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	Background information is considered as part of the complaint investigation.
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	This is stated within our complaint policy "Where you raise additional complaints during the investigation, these will be incorporated into Stage 1 response if they are relevant, and the stage 1 response has not been issued".

Stage 2			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations

5.14	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	We aim to respond to complaints within the target timescales, if an extension is required this is discussed with the resident and they are kept informed of the timeframe
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	The details of the ombudsman are on our website and also would be provided in cases where we cannot reach an agreement

Stage 3			
Code section	Code requirement	Do we comply	Evidence, commentary, and explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	This council operates a two stage complaints process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Not applicable the council operates a two stage complaints process

Section 6 - Putting Things Right			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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 complaints policy sets out that when things go wrong, we will apologise and take actions to put things right as quickly as possible and use the feedback to change and improve the way we deliver our services.
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	<p>When applying remedies staff consider the Ombudsman's guidance on remedies, and also refer to our compensation policy concerning redress to be made.</p> <p>To ensure ongoing compliance with the complaint handling code we provide regular training to staff on applying remedies.</p> <p>If a complaint requires more than what our compensation policy allows, this will either be done in conjunction with senior managers to approve a large compensation policy payment</p>
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	<p>Our complaint response letters are written clearly and considerately, setting out the remedies offered and will be followed through to conclusion.</p> <p>The Housing Project Officer will set any complaint to monitoring once the complaint response has been sent, to ensure that any actions that are outstanding are completed by action owners.</p>
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been	Yes	In awarding compensation these points are considered, the council also has a compensation

	incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.		policy in place to refer to on these matters. If a complaint is deemed to fall outside what the compensation policy supports, these decisions will be done in conjunction with senior managers,
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Best practice 'should' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	Service managers review the learnings from complaints, identifying trends, seeking to drive forward improvements and identify if anything needs to be changed in terms of policy, process, procedure, or systems.
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	Where a resident may have a legal entitlement to redress we will offer a resolution where possible, and will obtain legal advice as required.

Section 7 - Continuous learning and improvement			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	A consistent process for tracking and collating data from complaints is consistently improving. Wider learning and improvement from complaints is reported via the annual report and in our resident's magazine.

			Learning from complaints is also shared with our residents' group.
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Best practice 'should' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	The Group Head of Law and Governance has lead responsibility for complaints. With the support of the Group Head of Housing regular performance reports are provided to members which provides scrutiny of our complaint handling performance.
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 	Yes	<p>The provision of regular performance information to the committee is provided to our Housing & Wellbeing committee on a quarterly basis.</p> <p>At every committee meeting a KPI update is provided on our complaints position, and information on root causes and lessons learnt.</p>

	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	A quarterly report on themes and trends is presented to the corporate management team, and a monthly report is presented to the housing management team to discuss potential systemic issues, serious risks, or policies and procedures that require revision.
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	We are undertaking a service transformation as part of our implementation of a new housing management system, that will include review of objectives for employees, which will include best practice around complaint handling.

Section 8 - Self-assessment and compliance			
Mandatory 'must' requirements			
Code section	Code requirement	Do we comply	Evidence, commentary, and 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	This is undertaken annually in December
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will be undertaken in the event of a significant restructure and/or change in procedures

8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members. • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents. • include the self-assessment in their annual report section on complaints handling performance. 	Yes	<p>This self-assessment is reported to committee in January 2024. The self-assessment will be published on our complaints page on our website and will be included within our annual report.</p>
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