

# 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:  ‘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	Definition in Crawley Borough Council’s Complaints Policy (2022) (CBC Policy)  <b>“an expression of dissatisfaction, however made, about the standard of a service, actions or lack of actions by the council, its own staff, or those acting on its behalf, affecting an individual or group of individuals that requires a response”</b>
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	CBC policy  The complaints policy also covers complaints made via your local Councillor or Member of Parliament.  We can accept complaints by a representative. Although not explicitly mentioned in the policy. We are considering specifically stating 3 <sup>rd</sup> party in the policy.  Our revised online complaint form clearly states who can complete the form, including family members and health professionals.  Staff training will be given to ensure they can identify complaints and treat as such.
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	Staff training will be given to ensure they can identify complaints and treat appropriately.

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p><b>CBC Policy - What wouldn't be considered as a complaint?</b></p> <p>There are some instances where an expression of dissatisfaction will not be treated as a complaint under the council's complaints policy. Examples of these are:</p> <ul style="list-style-type: none"> <li>• A request for a service (e.g., a missed waste collection or reporting problems like fly tipping or litter.) These may subsequently be treated as a complaint if we don't deal with the original request.</li> <li>• Requests for information under the Freedom of Information Act or the Data Protection Act</li> <li>• Disagreement with a decision where a right of appeal exists, either within the council or externally (e.g. Benefits tribunal, Planning inquiry and Penalty Charge Notices)</li> <li>• An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision.</li> <li>• Services which are the responsibility of another organisation, e.g. highways, education and adult social care (West Sussex County Council), health matters (NHS), or local bus services (Metrobus).</li> <li>• Where we have taken legal action that we have a duty to perform, such as recovery of Council Tax or enforcement action.</li> <li>• A request for compensation only.</li> <li>• When there is a formal legal claim against the council or legal dispute.</li> <li>• When the matter is being dealt with through our insurers.</li> <li>• Disagreement with a council policy or legislation decision that we are applying when delivering a service.</li> </ul> <p><b>Time limit for making complaints</b></p> <p>Complaints should be made as soon as possible after the incident and no more than 6 months from the event or issue being complained about. Special circumstances for considering complaints beyond this time will be considered, including the reason for the delay in telling us what went wrong.</p>
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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	As above (section 1.7)
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	If a complaint is not accepted, the Service Manager would contact the complainant in the format it was received in to explain why e.g. email or post.  If the complaint is a service request, this will be acknowledged back by the Corporate Performance Team to the customer, explaining why it is not being logged as 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	CBC Policy states  "Upon receipt of the complaint, we will look at the issues you are raising to see if we need to do a full investigation or if we could resolve the issue for you quickly. We may need to contact you to discuss your issue further with you to help us fully understand what the problem is".
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	We will review surveys to include, where appropriate, information about how to make a complaint.

## 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>Complaints can be submitted using our online complaints form. You can also make a complaint by email, telephone on 01293 438000, visiting the Town Hall, or by writing to us:</p> <p>Corporate Performance Team, Governance People &amp; Performance Division, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ.</p> <p>Our preference is for customers to use the online form. If a complaint is received direct to the service by email, or by the other methods, this will be logged using the online form in the new process.</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	<p>New CBC policy. - This will be available on the website and in paper or other formats on request.</p> <p>We will promote this to tenants.</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>The launch of the updated policy and complaints management system will include a redesigned contact us webpage with separate forms for complaints and compliments. A separate complaints webpage will exist. <a href="https://crawley.gov.uk/contact">https://crawley.gov.uk/contact</a></p>
2.5	<p>Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.</p> <p>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.</p>	Yes	<p>CBC Policy - The Council is committed to ensuring the way we work does not place people who require assistance at a disadvantage when accessing our services. We will consider each request individually, aiming to agree and provide appropriate reasonable adjustments when they are needed and in compliance with the Equality Act 2010.</p> <p>The council has recently updated its Corporate Equality, Diversity and Inclusion Statement along with an Action Plan to support delivery of our priorities. This is available on the CBC website <a href="https://crawley.gov.uk/council-information/how-council-works/equalities">https://crawley.gov.uk/council-information/how-council-works/equalities</a></p> <p>Staff training will be given to ensure complaint handlers have knowledge of the act and how these requests can be dealt with.</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 Partially	We will be publicising to tenants the new CBC Policy once it has been formally agreed, along with information about the Housing Ombudsman Service.  We need to continue to consider how we might include information on our regular correspondence and ensure we publicise these at any events we may run.  The implementation of a new IT system will include a tenant portal and consideration as to how we use this for providing information to tenants is being discussed.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes partially	See above (section 2.6)
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	This information is included with the stage 1 response.

### 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.	No	The council have not considered this as part of our process at this time. We still encourage residents to report a complaint via the current method e.g. online, email, phone, in person or in writing  We respond to questions and feedback on social media but not as part of the formal complaints 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	The Corporate Performance Manager is the Complaints Officer for the Council  CBC Policy  "As a council we take complaints seriously and as such the reporting of complaints and lessons learned are an integral part of our performance management framework. This is vital to ensure we are delivering the best services for our customers.  This data is monitored on a quarterly basis at our Corporate Management Team meetings and monthly at a departmental level."
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Online training from the Housing Ombudsman and Workshops with the Local Government and Social Care Ombudsman have been completed.  Further training will continue to ensure handlers continue to meet the requirements in Section 3.3

### 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"> <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.	See above (Section 3.2)

## 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 <b>within five days of receipt</b> .	Yes	<p>CBC Policy This is the first stage, and we will acknowledge and log the complaint within four working days of receipt. Our acknowledgement can be made in writing (email or post) and will include:</p> <ul style="list-style-type: none"> <li>Confirmation that your complaint has been received and a date by which you can expect to receive a response. We endeavour to respond to you in full within 10 working days of the complaint being logged. In exceptional cases, we will provide an explanation to you containing a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good reason.</li> </ul>
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>A standard corporate response acknowledges the complaint and for any complaints for the landlord service an acknowledgment telephone call will be made to the complainant by the complaint handler.</p> <p>CBC Policy</p> <p>This is the first stage, and we will acknowledge and log the complaint within four working days of receipt. Our acknowledgement can be made in writing (email or post) and will include:</p> <ul style="list-style-type: none"> <li>Confirmation that your complaint has been received and a date by which you can expect to receive a response. We endeavour to respond to you in full within 10 working days of the complaint being logged. In exceptional cases, we will provide an explanation to you containing a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good reason.</li> </ul>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints are investigated by an officer not directly involved with the basis of the complaint.

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	<p>Staff handling complaints have completed the Housing Ombudsman Online training: Dispute resolution e-learning</p> <p>Some staff have completed training with the Local Government and Social Care Ombudsman on complaint handling.</p> <p>Ongoing training will ensure complaints are handled in a professional and impartial way.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We will ensure that we respect the tenants preferred method of communication. We will manage expectations to ensure that we can comply with any communication arrangements agreed with the tenant.
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>	No	We will include in our process a further conversation or communication (ideally by telephone unless a different communication method had been requested) for complaints we judge to be partly upheld or not upheld.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>CBC Policy</p> <p>If you have received a Stage 1 response and you wish to escalate this to a Stage 2, this should be made within one month of receiving the Stage 1 response.</p>
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	<p>CBC Policy</p> <p><b>2. What wouldn't be considered as a complaint?</b></p> <p>There are some instances where an expression of dissatisfaction will not be treated as a complaint under the council's complaints policy. Examples of these are:</p> <ul style="list-style-type: none"> <li>• A request for a service (e.g., a missed waste collection or reporting problems like fly tipping or litter.) These may subsequently be treated as a complaint if we don't deal with the original request.</li> </ul>



			<ul style="list-style-type: none"> <li>• Requests for information under the Freedom of Information Act or the Data Protection Act</li> <li>• Disagreement with a decision where a right of appeal exists, either within the council or externally (e.g. Benefits tribunal, Planning inquiry and Penalty Charge Notices)</li> <li>• An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision.</li> <li>• Services which are the responsibility of another organisation, e.g. highways, education, and adult social care (West Sussex County Council), health matters (NHS), or local bus services (Metrobus).</li> <li>• Where we have taken legal action that we have a duty to perform, such as recovery of Council Tax or enforcement action.</li> <li>• A request for compensation only.</li> <li>• When there is a formal legal claim against the council or legal dispute.</li> <li>• When the matter is being dealt with through our insurers.</li> <li>• Disagreement with a council policy or legislation decision that we are applying when delivering a service.</li> </ul> <p>Stage 1.....</p> <ul style="list-style-type: none"> <li>• There may be occasions when we consider the matter has been exhausted at Stage 1 and any further investigation would not change the outcome or decision. If this is the case, the decision to conclude the Council's complaints process at Stage 1 will be taken by the relevant Head of Service in consultation with the service manager. We will clearly state the reasons for not escalating the complaint and you will have the right to refer the matter to the Local Government and Social Care Ombudsman or Housing Ombudsman for their consideration.</li> </ul>
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 Partially	The complaint and its outcomes and reviews are recorded centrally. A new complaint management system will simplify the collation of all records and we will utilise our document management and housing management systems to ensure we track all correspondence and reports.

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	Section 10 of the CBC Policy 10. Unreasonably Persistent or Vexatious Complainants Policy There are a small number of customers whose behaviour we feel is unreasonable in pursuing the resolution of their complaint. This policy exists to deal with these instances and explains our approach.....
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### Best practice 'should' requirement

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	We will manage expectations within our acknowledgement phone call and explain clearly to residents if their desired outcome is unreasonable or unrealistic.  Including details of the Housing Ombudsman.
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	CBC Policy  We aim to provide excellent services to all our customers. If we get something wrong, we want to try to put it right quickly and learn from the mistake to help improve our services in the future  Responding to complaints in a timely manner is key to our approach.
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	CBC Policy  The Council is committed to ensuring the way we work does not place people who require assistance at a disadvantage when accessing our services. We will consider each request individually, aiming to agree and provide appropriate reasonable adjustments when they are needed and in compliance with the Equality Act 2010.  We would see the use of a representative as a reasonable request to ensure residents are not disadvantaged by the process.
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	We will explain legal obligations in a clear and concise way using plain language, with guidance from our legal team as necessary.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We will ensure all Data Protection and GDPR requirements are met. Only identifying individuals, if necessary, in a complaint.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We will agree contact times with complainants to keep them updated if the complaint takes longer than 10 working days to resolve.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	No	A satisfaction survey to gather feedback from complainants is in development
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	Regular meetings as teams and with individuals take place to understand the learning gained and any impact this may have.
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>CBC Policy</p> <p>When we believe a complainant to be unreasonably persistent or vexatious, we will use this policy to consider the appropriate and proportionate action based on evidence.</p> <p>The Council is committed to ensuring the way we work does not place people who require assistance at a disadvantage when accessing our services. We will consider each request individually, aiming to agree and provide appropriate reasonable adjustments when they are needed and in compliance with the Equality Act 2010.</p>

## Section 5 - Complaint stages

### Mandatory 'must' requirements - Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	<p>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 timeframe for when the response will be received. This should not exceed a further 10 days without good reason.</p>	Yes	<p>CBC Policy This is the first stage, and we will acknowledge and log the complaint within four working days of receipt. Our acknowledgement can be made in writing (email or post) and will include:</p> <ul style="list-style-type: none"> <li>• Confirmation that your complaint has been received and a date by which you can expect to receive a response. We endeavour to respond to you in full within 10 working days of the complaint being logged. In exceptional cases, we will provide an explanation to you containing a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good reason.</li> <li>• Our response can be provided by email, letter, face to face or by telephone. Where a response is given by telephone or in person, we will provide you with written confirmation of our discussions and any actions agreed.</li> <li>• Our response will set out the following: <ul style="list-style-type: none"> <li>○ the complaint stage and complaint definition</li> <li>○ the decision on the complaint and 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 2 if you are not satisfied with the response or in some cases refer you to the relevant Ombudsman Service.</li> </ul> </li> </ul>
5.5	<p>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.</p> <p>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>	Yes	<p>CBC Policy - We aim to provide excellent services to all our customers. If we get something wrong, we want to try to put it right quickly and learn from the mistake to help improve our services in the future</p> <p>Responding to complaints in a timely manner is key to our approach. The complaint handler will track outstanding actions or identify an officer to be responsible for keeping the complainant informed. We will build capacity into our Housing management systems to track outstanding items.</p>

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	We will ensure complaint handlers are skilled in completing Responses. Responses are monitored by senior managers.
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"> <li>the complaint stage</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	CBC Policy Our response will set out the following: <ul style="list-style-type: none"> <li>the complaint stage and complaint definition</li> <li>the decision on the complaint and 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 2 if you are not satisfied with the response or in some cases refer you to the relevant Ombudsman Service.</li> </ul>

## 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	CBC Policy <ul style="list-style-type: none"> <li>If you do require a further review, please make the request within one month of receiving the Stage 1 response and specify which aspects of the complaint you remain dissatisfied with i.e., what is specifically wrong or missing from the Stage 1 response.</li> <li>There may be occasions when we consider the matter has been exhausted at Stage 1 and any further investigation would not change the outcome or decision. If this is the case, the decision to conclude the Council's complaints process at Stage 1 will be taken by the relevant Head of Service in consultation with the service manager. We will clearly state the reasons for not escalating the complaint and you will have the right to refer the matter to the Local Government and Social Care Ombudsman or Housing Ombudsman for their consideration.</li> </ul>

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	The head of service contacts complainants, usually by telephone, to understand the request for a review and where they are unhappy with the stage 1 outcome.
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	<p>CBC Policy</p> <p>Our response will set out the following:</p> <ul style="list-style-type: none"> <li>• the complaint stage and complaint definition</li> <li>• the decision on the complaint and 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 2 if you are not satisfied with the response or in some cases refer you to the relevant Ombudsman Service.</li> </ul> <p>If you do require a further review, please make the request within one month of receiving the Stage 1 response and specify which aspects of the complaint you remain dissatisfied with i.e., what is specifically wrong or missing from the Stage 1 response.</p>
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 Head of Service completes all stage 2 reviews.
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	<p>CBC Policy</p> <ul style="list-style-type: none"> <li>• We aim to respond to Stage 2 complaints within 20 working days of the complaint being escalated. In exceptional cases, we will provide an explanation to you containing a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good reason.</li> </ul>

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 stage</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> </ul> <p>and</p> <ul style="list-style-type: none"> <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>		<p>CBC Policy</p> <p>Our response will set out the following:</p> <ul style="list-style-type: none"> <li>• the complaint stage and complaint definition</li> <li>• the decision on the complaint and 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 relevant Ombudsman if you remain dissatisfied with the response.</li> </ul> <p>Completion of the Stage 2 review will conclude the Council's complaints process.</p>
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**Stage 3 – Not applicable**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	<p>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.</p>	N/A	
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 stage</li> <li>• the complaint definition</li> </ul>	N/A	

	<ul style="list-style-type: none"> <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>		
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## 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 will aim to agree a realistic time frame with the complainant and confirm in writing.
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	If we are unable to agree a time frame, we will confirm this in writing and include the details of how to contact the Housing 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.	Partially	We will refer to all previous reports as background information if the complaint is about a recurring issue.
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	CBC Policy  If more information or additional complaints are raised during the complaint investigation and is relevant to the original issue and a response has not been provided, we will include these in our response



## 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 will aim to agree a realistic time frame with the complainant
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	If we are unable to agree a time frame, we will confirm this in writing and include the details of how to contact the Housing Ombudsman

## Stage 3 – Not applicable

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>within 20 working days</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.	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	Staff have completed the Housing Ombudsman Online training: Dispute resolution e-learning  Some staff have completed training with the Local Government and Social Care Ombudsman on complaint handling.  Ongoing training will ensure complaints are handled in a professional and impartial way.
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	We manage resident expectations and ensure any remedy is fair and deliverable.  Remedies will follow the guidance offered by the Housing Ombudsman in his guidance notes and our own Compensation Policy.
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.	Partially	The resolution and any remedy offered clearly explains what will happen.  The complaint handler will track outstanding actions or identify an officer to be responsible for keeping the complainant informed
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	We follow our Compensation policy and the Housing Ombudsman Guidance and consider statutorily payments.

## 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	We learn from complaints and will to continue to ensure our systems are fit for purpose and correct any failings in our processes that we find.
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	We will consult with the Councils' legal team if there is a legal entitlement to redress.

## 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>Basic learning is included in our summary annual report. Greater depth to learning from complaints is included in our Annual Report available online.</p> <p>Our tenant scrutiny panel TLAP receive updates on complaints at their quarterly meetings.</p> <p>Feedback to staff takes place in team meetings and at the weekly maintenance learning board.</p> <p>We need to continue to consider how we might include more frequent information on our learning to our residents. This could include on our website and at our events.</p>

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	<p>A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.</p>		<p>Regular updates on complaints are a standing item on the Corporate Management team's quarterly agenda</p> <p>The Corporate Performance Manager as the Council's Complaints Officer also attends these meetings on a quarterly basis.</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.</li> <li>• The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Partially	<p>Complaint handling performance will be discussed with the Cabinet member for housing and leader of the council at monthly meetings.</p>
7.5	<p>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.</p>	Yes	<p>Meetings to discuss complaints, their outcomes and any themes or trends are held by the senior management team monthly.</p> <p>The weekly Learning Board session for maintenance staff and contractors helps to identify themes and trends.</p>

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <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 act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>		<p>We include a standard objective regarding complaints in the Annual Plan, Develop and Review (PDR) conversation held between managers and staff.</p> <p>This reflects working together collaboratively in a no blame culture.</p> <p>We will refer to elements of the CIH professional standards within the training we do.</p>
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## 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	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The completion of this self-assessment has been deferred to September 2022 to ensure we capture the updates to the Council's corporate complaints policy.
8.3	<p>Following each self-assessment, a landlord must:</p> <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	<p>The outcome will be reported to the Cabinet member for Housing and the Leader of the Council.</p> <p>The assessment will be published on the council's website</p> <p>Our online version of the Annual Report will include a commentary on the self-assessment and a link to the full assessment.</p>