Housing Ombudsman Self-assessment June 2024

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Policy – section 4. Link to website – Make a complaint Haringey Council	Our policy has been redrafted to include all changes covered by the new code. Our definition of a complaint has been consistent with the approach in the code since 2022 and remains the same. Note: Our policy is currently in draft form (draft is published on website) and will be presented to Cabinet for formal approval in July 2024.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Policy – section 8	We treat any indication of dissatisfaction as a complaint, and where we may be unsure, we engage with the resident to verify their request. Relevant officers have attended Housing Ombudsman complaints training online to subsequently access the KIM training.

				We are also in discussions with our learning and development team regarding a corporate complaints training module.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Policy – section 3 / 4 Non-Complaint Contact Annual Feedback Report – 22/23	Our policy clearly defines the difference between a service request and a complaint. Service requests are captured and shared with the relevant service area for action.

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Work instructions	Our system enables us to link cases, so where a service request has escalated to a complaint, we are able to link the two. Once the draft policy has been approved by the Cabinet, we will be developing and rolling out a refreshed procedure for all responding officers.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Kwest Research TSM Report 202324	Our tenant satisfaction survey is conducted by a third party. They advise tenants and leaseholders on how to make a complaint where necessary.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Policy – section 7 Link to website – <u>Make a complaint Haringey Council</u>	Circumstances under which we are unable to accept a complaint are clearly defined in our policy. It is also outlined on our website.
	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Yes	Policy – section 7	Circumstances under which we are unable to accept a complaint are clearly defined in our complaints policy.
2.2	The issue giving rise to the complaint occurred over twelve months ago.			
	Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.			

	Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Policy – section 10 Link to website – Make a complaint Haringey Council	Our policy details a list of exclusions which defines complaints that we cannot consider. The exclusions listed are consistent with the code published by the Ombudsman. The complaints we cannot deal with are also published on our website.
2.4	If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Policy – section 7/ 10 Work instructions Templates	The team triaging complaints have been provided with detailed work instructions which outline the steps to take when we may be refusing a complaint. We also have templates created for officers to use in these circumstances.

2.5 Landlords must not take a blanket approach to excluding complaints; the must consider the individual circumstances of each complaint.	Yes /	Work instructions	Any decision made is recorded on the case management system for audit purposes.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Policy – section 6 / 8 /14	Complaints can be made through various channels including in person, telephone, letter, online and via representatives. Mandatory training is provided to all staff on the Equality Act 2010 and how to respond to reasonable adjustments in line with this.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Local training material Feedback Forum slides	We provide ad-hoc training to services when required, however we are in the process of developing a training package around the importance of Feedback – in addition to the material we already have.

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Annual Report – 22/23	We believe our complaint volumes are comparative to other Local Authorities in London.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Policy Link to website – Make a complaint Haringey Council Add a note to the website about if you require this in another format - then we can link	The policy is published on our website, and if residents require it in a different format, this is available upon request. If residents are not digitally confident or do not have access, they are able to approach an officer in one of our customer service centres, where they will be happy to print a copy. Our complaints policy is available online and states we will make reasonable adjustments for accessibility where appropriate. We also outline the complaints process, detailing the timeframes for responding at each stage.

3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Policy – section 18 Link to website – Make a complaint Haringey Council	The policy is published on our website, along with details of each Ombudsman and this code.
			Homezone (in-house Housing magazine) Housing magazines and bulletins	We also communicate how to provide feedback to the Council in our regular tenant and leaseholder magazine – Homezone.
3.6	Landlords must 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.	Yes	Policy – section 8	This is included within our policy.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Templates Link to website – Make a complaint Haringey Council Homezone (in-house Housing magazine) Housing magazines and bulletins	This is included within our policy, and information shared on our website. We also include the Ombudsman information on our response templates at Stage 1 & Stage 2.
				We have Housing Ombudsman posters displayed in our face-to-face contact centres and libraries throughout the Borough.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Job descriptions Structure chart CLT slides AR is shared on website	We have a Feedback and Resolutions Team dedicated to the administration of complaints. Cabinet is our Governing Body. We will be presenting the annual report to Cabinet in October 2024, and then to the Overview and Scrutiny Committee in November 2024.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Escalation process / work instructions Feedback Forum HSMT attendance / reports	We attend bi-monthly meetings with the Senior Management Team for Housing, where a performance report is shared. Our Feedback Forum is open to all responding officers and Senior Managers which is held quarterly. This has created a network for responding officers to enable effective resolution and to

Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaints are seen as a core service and must be resourced to handle complaints effectively. Annual Feedback & Resolutions Report 22/23 Training material Feedback Forum Slides Annual Feedback & Resolutions Report 22/23 Training meeting initial plan We recognise corporate systematically learning complaints is an area the continues to require fur work. We are currently capture learning on an ad-hock directly from services a can evidence this is in order to an evidence this is in order to a complaint to a provide the evidence to an evidence the evidence that the evidence th					share good practice.
4.3 Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaints are seen as a core service and must be resourced to handle complaints effectively. Training material Feedback Forum Slides systematically learning complaints is an area thread complaints are seen as a core service and must be resourced to handle complaints effectively. Training material Feedback & Resolutions Report 22/23 continues to require fur work. Training meeting initial plan We recognise corporate systematically learning complaints is an area thread continues to require fur work. We are currently capture learning on an ad-hock directly from services a can evidence this is in order to the complaints.					Work instructions provide officers within the Feedback and Resolution Team a clear route of how to escalate matters to when necessary.
We are in the process of developing a casework management system will better allow us to trade learning and improvement in the process of the	4.3	complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to	No	Feedback Forum Slides Annual Feedback & Resolutions Report 22/23	We recognise corporately that systematically learning from complaints is an area that continues to require further work. We are currently capturing learning on an ad-hoc basis directly from services and we can evidence this is in our last annual Feedback report. We are in the process of developing a casework management system which will better allow us to track learning and improvements. This is due to be delivered by December 2024. The new system will allow us

strategic planning. We will also be in an improved position to view our data holistically, which will give us better insight into common themes We will expect services to use this data – alongside other forms of customer feedback. performance information, Ombudsman reports etc – to improve services throughout the year. Additionally, we have created a new Feedback and Resolutions Insights Officer post which will focus on the quality of our data, and how we can learn from it. We anticipate that this role will filled by the end of Summer 2024. We are working with our Learning and Development team about how relevant information about complaint handling is available to all staff, and specifically how we can provide e-learning for

	those officers responsible for responding to complaints within their service area. Officers working in the
	Feedback and Resolutions team already receive relevant and appropriate training and
	professional development.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Policy Link to website – <u>Make a complaint Haringey Council</u>	Our Corporate, Statutory and Housing policies have been combined into one. We are using the draft policy as a working document at present. However, this will be presented to Cabinet in July 2024 for formal approval.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Policy Link to website – Make a complaint Haringey Council	We have a two-stage process, Stage 1 & Stage 2.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Policy Link to website – Make a complaint Haringey Council	We have a two-stage process, Stage 1 & Stage 2.

	Where a landlord's complaint response	Yes	Policy	Our policy outlines that where
	is handled by a third party (e.g. a			a complaint relates to a third
5.4	contractor or independent adjudicator)		Link to website –	party, they may undertake the
0.4	at any stage, it must form part of the		Make a complaint Haringey Council	Stage 1 investigation. This
	two stage complaints process set out in			will depend on the specific
	this Code. Residents must not be			arrangements in place under
	expected to go through two complaints			each contract.
	processes.			
				Our policy is also clear that
				residents are not expected to
				go through two complaint processes. We will take
				proactive steps to ensure
				contractors are familiar with
				our new complaints policy
				following its approval by
				Cabinet.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.			Where this arrangement is in place we are engaging with our contractors to ensure that all complaints are handled in line with the code. This will form part of contract management to ensure that contractors are processing complaints in line with the code. This will also form part of our procurement / tender process for new contracts awarded moving forward where we determine that the contractor is best placed to handle stage
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Templates Work instructions Respond Manual	one complaints themselves. Our templates and user guides have been updated to reflect this.

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Templates Work instructions Respond Manual	Our templates and user guides have been updated to reflect this.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and	SFRO Workshops PP Work instructions Feedback Forum	Our Feedback Forum is open to all responding officers & Senior Managers which is held quarterly. This has created a network for responding officers to enable effective resolution and to share good practice. We have recently set objectives for officers in the Feedback and Resolution Team which is in line with the Ombudsman code.

	d. consider all relevant information and evidence carefully.			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Feedback Forum #5 Templates Work instructions	All responding officers are aware that where a complaint investigation cannot be completed within the required timeframe, the resident must be informed and kept updated.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		Appendix 1 – Draft Vulnerable Council Tenants and Leaseholders Policy Vulnerability Comms Flags	Our draft policy is being presented at Cabinet in July. We also have a 'flag' system in place on our housing system which will indicate any resident vulnerability. The information that filters through to these flags are formally reviewed through tenancy audits and welfare checks but these procedures are also subject to review following the new policy.

5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		Policy – section 9 Refusal template Work instructions	This is referred to in the policy and is made clear on our templates when refusing a complaint.
5.12	A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.	Yes	Snip of case inc. survey	We use a case management system where all this information is recorded.

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Training Feedback Forum	We actively encourage all responding officers to seek resolution to a complaint at the earliest opportunity.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			We have recently re-written our unreasonable behavior policy, and this is published on our website. A record of restrictions is attached to the relevant case in our case management system. We also have a local version of restrictions which can be accessed by the Feedback and Resolutions management team.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.		Policy for Managing Unreasonable or Unacceptable Customer Behavior	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Policy Link to website – <u>Make a complaint Haringey Council</u>	Our policy clearly sets out the stages of a complaint and the process behind it.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Policy CLT Quarterly Reports	Our system has been configured to accommodate a 5-working day acknowledgement period and this is reiterated in our policy.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Policy Performance Reports	Our system has been configured to accommodate 10 working day response period from acknowledgement and this is reiterated in our policy.

	Landlords must decide whether an	Yes	Policy	All responding officers are
6.4	extension to this timescale is needed		Feedback Forum #5	aware that where a complaint
0.4	when considering the complexity of the			investigation cannot be
	complaint and then inform the resident			completed within the required
	of the expected timescale for response.			timeframe, the resident must
	Any extension must be no more than 10			be informed and kept
	working days without good reason, and			updated.
	the reason(s) must be clearly explained			·
	to the resident.			

6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Templates	Our templates have been amended to reflect this.
6.6	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes	Ombudsman Complaint Handling Codes (Briefing) Feedback Forum	We have provided guidance of this following the introductions of the code.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Senior Sign off (HoS / AD / Director) Templates	Our templates are designed to assist services to provide thorough responses in line with the code. The sign off process ensures that this is adhered to.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being	Yes	Work instructions	Noted.

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	•	Our templates have been amended to reflect this model.

Stage 2

Code	('Ode requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	1	This is our process in line with the code.

Ī		Requests for stage 2 must be	Yes	Policy	Our system has been
	6.11	acknowledged, defined and logged at		Work instructions	configured to accommodate a
		stage 2 of the complaints procedure			5-working day
					acknowledgement period and
					this is reiterated in our policy.

	within five working days of the escalation request being received.			
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Work instructions	Where possible, investigating officers will make reasonable efforts to understand why the resident remains unhappy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.		Work Instructions Link to website – Make a complaint Haringey Council	S2 investigations are completed by an impartial, central team and signed off by the relevant Assistant Director.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.		Policy Work instructions Performance Reports SFRO Workshops	Please refer to policy.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.		Stage 2 work instructions	Our Investigating officers are aware that where a complaint investigation cannot be completed within the required timeframe, the resident must be informed and kept updated.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Templates	Our templates have been amended to include this.

		A complaint response must be provided	Yes	Ombudsman Handling Code	Noted.
6.1	7	to the resident when the answer to the		Briefing	
		complaint is known, not when the			

	outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Director)	Our templates are designed to assist services to provide thorough responses in line with your guidance. The sign off process should ensure that this is adhered to.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	•	Our templates have been amended to reflect this model.

ſ		Stage 2 is the landlord's final response	Yes	Work instructions	Noted.
	6.20	and must involve all suitable staff			
	0.20	members needed to issue such a			
		response.			

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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. These can include:	Yes	Templates Closure notices Annual Feedback & Resolutions Report 2022-23 Training	Noted.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Housing Compensation Policy & Procedure 2023 Training	Noted.
7.3	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	Training Work Instructions	At Stage 2 we track the commitments made, and we are in the process of building capability to ensure that this is also done at Stage 1.

	Landlords must take account of the	Yes	Whilst Ombudsman guidance
7.4	guidance issued by the Ombudsman		is shared across the
7.4	when deciding on appropriate		Feedback and Resolutions
	remedies.		Team, we are in the process
			of designing intranet pages
			where all responding officers
			will be able to access a
			plethora of information,
			including recent Ombudsman
			guidance.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Annual Feedback & Resolutions Report 2022-23	Annual Report (self- assessment is included) will be presented to Overview and Scrutiny Committee & Cabinet.

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Link to website – Make a complaint Haringey Council	The annual report cannot be completed for this period until the HO / LGSCO annual letters are issued. Once we are in receipt of this, the report will be presented to the Cabinet, Overview & Scrutiny Committee and published on our website in line with our governance schedule.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes		Noted
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Noted
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		Noted

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Annual Feedback & Resolutions Report 2022-23 F&R Insights Officer job description S2 Work instructions SFRO Workshop PP – 30 th April 2024	We recognise corporately that this is the area where we still have work to do. We are currently capturing learning on an ad-hoc basis directly from services and we can evidence this is in our last annual report. We are in the process of developing a casework system which will better allow us to track learning & improvements. This is due to be delivered by December 2024. We are in the process of recruiting a Feedback & Resolutions Insights Officer to gain a greater understanding of learning from complaints and driving service improvement using data.

9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Training Feedback Forums Senior Sign Off process CLT Reports HSMT Reports	We report monthly / quarterly on performance across the organisation in relation to complaints to our Senior Leadership Team. Highlights of this performance are then shared in our Feedback Forums, which are designed to encourage shared learning, good practice, problem solving and updates for all responding officers.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Annual Feedback & Resolutions Report 2022-23 CLT Reports HSMT Reports Housing_Performance_Slide_Dec k_February_2024_(RVB version) v2	In addition to the above, performance data is shared with our Residents Voice Board.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Claire McCarthy – Assistant Director of Strategy, Comms & Collaboration	The Feedback and Resolutions team report into the Assistant Director of Strategy, Communications and Collaboration. The Feedback Team, under the supervision of the Assistant Director, will be responsible for providing data and insight on complaints themes and trends to services. They will

	work with Service Directors to
	identify potentially serious
	risks or trends that require
	action alongside ensuring
	learning from complaints is
	embedded more generally in
	teams across the council.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		We have a lead Elected Member who is the Cabinet Member responsible for Residents Services & Tacking Inequality, which includes complaints.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes		Our MRC attends Cabinet, Overview and Scrutiny and other fora to present and discuss the annual report.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	Yes	CL ['] T Reports HSMT Reports Open & Overdue Report – 13 th May 2024	Quarterly performance reports will be shared with the MRS to provide an additional overview of complaint performance. Cabinet Members also receive a weekly report which illustrates open / overdue cases which is shared across the organisation.

	d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	No	Training plan initial meeting notes	We are in discussion with our Human Resources team and operational managers about how we can incorporate this into the standard objective setting for our Responding Officers.