



Complaints Process 2025

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Castle Point Borough Council, Council Offices, Kiln Road, Benfleet, Essex, SS7 1TF. 01268 882200

Foreword:

We always want to provide our customers with the best service possible; however we appreciate that sometimes things can go wrong. If there is a problem, we need you to tell us so that we can investigate, put things right and learn from it. This will help us to continuously improve our service to you.

This policy explains how you can make a complaint, how we will investigate and respond to your concerns and how you can progress the matter if you remain dissatisfied. It also covers what types of issues the complaints process can address and what it cannot.

The Council is committed to equality and equal access for all, and the strategy complies with the authority's single equality scheme and associated actions and principles.

To ensure we act and learn from customer feedback, all comments, compliments and complaints need to be recorded and progress monitored. The process for doing this is outlined below.

This policy meets the requirements of the complaint handling code of conduct introduced by the Local Government and Social Care Ombudsman (LGSCO) and the Housing Ombudsman Service (HOS) in April 2024.

This document addresses the above two categories of complaints and is split into the following parts:

1. General corporate complaints under the requirements of the handling code of conduct by the Local Government and Social Care Ombudsman (LGSCO) – see page 9
- and,
2. Complaints received by the Council as a social landlord as governed by the handling code of conduct by the Housing Ombudsman Service (HOS) – see page 14

1. Definitions:

A complaint is ***“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.”***

A service request may be defined as ***“a request that the organisation provides or improves a service, fixes a problem or reconsiders a decision.”***

2. Issues which the Complaints process cannot address

Our Complaints Process cannot be used to report service requests such as;

- A missed bin collection

- Fly tipping
- An abandoned vehicle
- Noise disturbances or nuisance
- Anti-Social Behaviour
- A problem with your property that requires repair
- Complaints made as part of a survey

Should you wish to make an initial report of a problem that requires assistance from Council services, this can be done through the relevant departments ([Contact us | info@castlepoint.gov.uk](mailto:info@castlepoint.gov.uk)) or by calling 01268 882200.

If you have previously reported a problem but feel appropriate action has not been taken, you may then raise this as a formal complaint.

Freedom of Information Requests & Subject Access Requests

The Freedom of Information Act 2000 (FOIA) gives the public the right to request information held by us.

The General Data Protection Regulation (GDPR) provides individuals with a right of access to their personal information, through a Subject Access Request (SAR).

Such requests for information cannot be processed as part of the Complaint process and will be discharged separately.

Please visit our website, for details how to submit a request for FOIA or SAR information or contact the Data Protection Officer on DPO@Castlepoint.gov.uk.

Matters where you have a formal or legal right of Appeal

The complaints process cannot be used to address matters pertaining to planning permission, applications for housing benefit, or other matters which are the subject of legal proceedings, such as eviction proceedings.

In these cases, departmental Officers will advise you on appropriate steps that you can consider.

Matters over which the Council has no jurisdiction

The Complaints process cannot be used to address matters where Castle Point Borough Council has no jurisdiction, such as:

- Potholes & Road Repairs – this is the responsibility of Essex County Council
- The Public Highway – this is the responsibility of Essex County Council
- Adult Social Care – this is the responsibility of Essex County Council

- Childrens' Social Care – this is the responsibility of Essex County Council
- Local Policing – this is the responsibility of Essex Police

Any damages or loss incurred due to conditions of roads, pavements etc. is the responsibility of Essex County Council.

Matters involving insurance claims

The complaints process cannot address matters which must be investigated for the purposes of an insurance claim.

In such instances where a claim against the Council's insurers is made, this should discuss this with your own insurer.

Duplicate Complaints

If you submit the same or similar complaint while a matter is under investigation, this will not be treated as a new Stage 1 complaint, and you will be advised of such.

Matters already addressed

If your complaint has already gone through the complaints process and you have received a formal response and decision, this will not be investigated as a new Stage 1 complaint.

3. Issues which the Complaints process can address

- Failure to provide a service which we should have provided.
- Unreasonable delays in providing a service.
- Dissatisfaction with the way a policy has been applied.
- Failure to fulfil our statutory responsibilities.
- Provision of inaccurate or false information.
- Inappropriate conduct of staff or contractors.

4. Diversity and Inclusion

The Council is committed to taking action to ensure that the way we work does not place disabled people at a disadvantage, and to meet our legal obligations under the Equality Act 2010.

The Equality Act 2010 requires us to provide reasonable adjustments for you if you are disabled. Under the Act this means you have a “physical or mental impairment which has a substantial and long-term adverse effect on your ability to carry out normal day to day activities”. Our duty is to make “reasonable adjustments” if the way that we carry out our complaints process places you, as a disabled person, at a “substantial disadvantage” compared to someone who is not disabled.

Requesting reasonable adjustments

Specific reasonable adjustments are not defined by the Act. If you feel there is reasonable adjustment to be made during the complaints process then please contact us with your request.

Some examples of adjustments that we can make during the complaints process are;

- Providing documentation in larger print.
- Giving you more time than usually allowed to provide further information or respond accordingly.
- Calling you in addition to corresponding in writing.
- Corresponding via post instead of email or using online tools.
- Communicating with you via your representative or advocate.
- Providing translated letters.

All complaints at formal Stage 1 and 2 should be recorded in the corporate database. The database also allows for a compliment or comment to be recorded and services may nominate a specific Officer to enter the details according to local management arrangements.

If your complaint is being registered by a third party, we require your consent and authorisation to discuss this matter with the named individual or organisation.

As part of your complaint, you will need to provide your contact details and a clear explanation of:

- What you think we did wrong, and
- What you believe should have happened under the circumstances.

Please provide any supporting documentary evidence that you wish to be considered as part of your complaint.

5. Unacceptable Behaviour during the process.

Aggressive or abusive behaviour

We understand that you may be frustrated about an issue you are reporting, particularly if the issue has escalated to the point where you feel it is necessary to make a complaint. It is, however, unacceptable if this frustration turns into aggressive or abusive behaviour towards our staff.

Verbal abuse, aggression and violence towards our staff is **not** tolerated. This can include behaviour or language (whether spoken, written or via social media) that makes our staff feel offended, afraid, threatened or abused. For example, threats, personal abuse, offensive remarks, shouting or swearing.

Language that is racist, sexist, homophobic or that makes serious allegations that staff have committed criminal or corrupt conduct without evidence is unacceptable. Similar comments which are aimed at third parties are unacceptable because of the effect they may have on staff. We also consider inflammatory statements to be

abusive behaviour.

Other unreasonable behaviour and demands.

We appreciate the concern you have raised is important to you and we will do our best to respond within the timescales given. It is however deemed unacceptable to bombard our staff with calls or other forms of contact especially when Officers have managed expectations around timescales. This is deemed as unreasonable levels of contact.

Actions that may be taken due to such behaviour.

Our staff do not have to tolerate unacceptable behaviour in any circumstances and should the behaviour continue following warnings given (face to face, by telephone, email etc), the line of communication will end. Should the behaviour continue to take place, the decision to restrict contact will be carefully considered. The decision for restricted contact will be considered in line with the Council's Unacceptable Behaviour Policy.

6. Monitoring complaints and acting to improve.

Throughout the complaints process the complaints database must be updated with details of any correspondence and the progress in the case.

The complaints database contains a full history of the complaint, the stage the complaint is at, the correspondence entered into, the officer dealing and a contact history. This database is strictly private and confidential. Details of the complainant will not be released to any third party, unless that third party has been authorised by the complainant.

The Council will look beyond the circumstances of the individual complaint and consider whether any service improvements can be made as a result of any lessons learnt from the complaint.

The Council must produce an annual Complaints Performance and Service Improvement Report for scrutiny and challenge, which must include:

- the annual self-assessment against the Complaint Handling Code to ensure this complaints policy remains in line with its requirements;
- a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the Council has refused to accept;
- any findings of non-compliance with this Code by either of the Ombudsmen;
- the service improvements made as a result of the learning from complaints;
- any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

The annual Complaints Performance and Service Improvement Report will be reported to the Overview and Scrutiny Committee and then to the Cabinet for endorsement.

7. Further information

For more information on Castle Point Borough Council's Complaints Process, please contact us:

Website: www.castlepoint.gov.uk

Email: customercare@castlepoint.gov.uk

Phone: 01268 882200

We review and assess our Complaints Policy and processes in line with LGSCO and HOS Complaint Handling Codes.

For more information on The Local Government and Social Care Ombudsman and the Housing Ombudsman, please contact;

- Local Government Ombudsman: www.lgo.org.uk or telephone 0300 061 0614
- Housing Ombudsman: www.housing-ombudsman.org.uk or telephone 0300 111 3000

We reserve the right to make amendments to this policy as necessary.



GENERAL CORPORATE COMPLAINTS

Complaints should be made within 12 months of the events occurring, otherwise we may not be able to investigate the matter.

1. How to make a complaint

You can make a complaint in writing (addressed to the Customercare@castlepoint.gov.uk), via the Council's online form www.castlepoint.gov.uk/form-make-a-complaint or by telephoning the Council. This is not a comprehensive list of how to make a complaint. Your complaint can be submitted via another route, and we will make reasonable adjustments to facilitate this being put through our Complaints process.

All complaints at formal Stage 1 and 2 should be recorded in the corporate database. The database also allows for a compliment or comment to be recorded and services may nominate a specific Officer to enter the details according to local management arrangements.

If your complaint is being registered by a third party, we require your consent and authorisation to discuss this matter with the named individual or organisation.

As part of your complaint, you will need to provide your contact details and a clear explanation of:

- What you think we did wrong, and
- What you believe should have happened under the circumstances.

Please provide any supporting documentary evidence that you wish to be considered as part of your complaint.

Stage 1 Complaint.

When you make a complaint, you will receive an acknowledgement within 5 working days. At this stage, you will be informed whether the matter is to be dealt with as a service request or is a formal complaint.

If it is accepted as a formal complaint, the initial Stage 1 investigation will be carried out by the relevant Team Manager or Assistant Director (the Lead Officer for the complaint) and a full response will be issued within 10 working days of your complaint being acknowledged.

If the matter is complex and we require more time to complete our investigations, we will let you know the expected timescale for response at the earliest opportunity and, if possible, no less than 2 working days before the response due date. You will also be provided with the contact details of LGSCO..

If further information is submitted during any stage of the investigation, additional time may be required to review the submission and provide our response.

To investigate the complaint, the Lead Officer may:

- Arrange to meet with appropriate Officers to clarify the complaint as appropriate.
- If appropriate, arrange to meet with the complainant to clarify the issues and clarify any action the complainant feels appropriate to resolve the complaint as appropriate.
- Seek to obtain and examine all relevant evidence.
- Reach a conclusion based on the evidence.
- If the complaint is about a proposed action by the Council, consider whether the action should be deferred while the complaint is investigated.

Our Stage 1 response will tell you:

1. If we have identified any fault, and,
2. If a fault is identified, what actions we will take to put matters right.

If you are dissatisfied with our response, you may request for a Stage 2 review which will be escalated to a senior member of the Leadership Team.

Stage 2 Complaint – Escalation Request.

This is the final stage of investigation and is undertaken by the Chief Executive or delegated to one of the Directors.

The Complaints Monitoring Officer will undertake to acknowledge receipt of the complaint within 5 working days. The acknowledgement should contain:

- Confirmation that the complaint has been progressed to Stage 2, and
- Appropriate contact details of the Officer investigating the complaint.

If the matter is complex and requires more time to complete our investigations, we will let you know the expected timescale at the earliest opportunity, and if possible, no less than 2 working days before the response due date.

If further information is submitted during any stage of the investigation, additional time may be required to review the submission and provide our response.

The following actions may be undertaken:

1. Contact the complainant to:
 - clarify the complaint;
 - clarify the outcome sought;
 - establish if the complaint can be resolved without further investigation
 - check whether the complainant needs support of any kind, or has poor sight or hearing, or a language difficulty, and check what help the complainant needs to be able to understand the discussion properly;
 - explain the investigation procedure; and
2. Assess whether the complaints procedure is the most appropriate way of handling this complaint. Consider possible alternative procedures:
 - an appeal to a tribunal;
 - legal action; or
 - police involvement.
 - discuss the alternatives with the complainant.

As consideration of the complaint proceeds, the question of the appropriate mechanism should be reviewed as necessary.

A full and comprehensive investigation will need to be undertaken at Stage 2.

- If the complaint is about a proposed action by the Council, consider whether the action should be deferred while the complaint is investigated.
- Obtain all relevant documents (ensuring that you see the originals, not copies). These may include files, logbooks, and time sheets. Get copies of all the documents you need.
- Establish the relevant sequence of events from the complaints database and by speaking to Officers concerned

- Speak with any Officers concerned, noting the content of the discussion and ensuring that all those to be interviewed are aware that they can be accompanied by a friend or a union representative.
- Arrange to speak with the complainant if appropriate, noting the content of the discussion and ensuring they are aware of their right to be accompanied by an advocate
- Consider whether you need a witness to an interview which may be particularly difficult.
- Interviews should be conducted in an informal and relaxed manner, but persist in your questions if necessary. Do not be afraid to ask the same question twice. Make notes of each answer given.
- Deal with conflicts of evidence by seeking corroborative evidence. If this is not available, then as an exceptional measure, consideration can be given to organising a confrontation between the conflicting witnesses.
- At the end of the interview, summarise the main points covered and ask if the interviewee has anything to add.
- Make a formal record of the interview from your written notes as soon as possible after the interview, while your memory is fresh. Never leave it longer than the next day.
- If appropriate, visit the establishment complained about unannounced to check normal practices.
- Investigate thoroughly, but only enough to get sufficient information to make a fair and properly informed decision.
- Draft a report setting out the evidence obtained, without conclusions, recommendations or opinions. Circulate this for comment to all those interviewed, including the complainant, unless there are special reasons not to do so.
- Consider comments and amend the report as necessary, adding conclusions and, if appropriate, a suggested remedy for the complainant.

If you disagree with the outcome of our investigations

If on conclusion of our complaints process you believe your concerns have not been addressed appropriately, you have the right to take your case to an Ombudsman.

The Local Government and Social Care Ombudsman is an independent body that will impartially review your complaint.

The Ombudsmen will not usually accept a complaint until it has fully completed the Council's process.

Further information can be obtained directly from the relevant Ombudsman themselves:

- Local Government and Social Care Ombudsman: www.lgo.org.uk or telephone 0300 061 0614



COUNCIL HOUSING COMPLAINTS

Introduction

The Regulator of Social Housing (RSH) requires us to adopt an approach to complaints that is simple, accessible and publicised. Complaints should be resolved promptly, politely and fairly. The Housing Ombudsman Complaint Handling Code requires landlords to build a positive and consistent complaint handling culture.

Failure to handle complaints effectively can impact on our overall customer satisfaction and result in an excessive amount of resources being used. Complaints should be resolved promptly whenever possible with the individual circumstances taken into consideration. Landlords must make it easy for residents to complain and consider the Equality Act 2010 to anticipate the needs of and make reasonable adjustments for residents who need to use the complaints process. Residents making a complaint should be asked if they have any needs or disability that would require reasonable adjustments to be made under this policy. How complex a complaint is and whether the complainant is vulnerable or at risk should be considered as early as possible in the complaint process. Further information on dealing with complaints made by someone vulnerable or with a disability can be found in the Housing Reasonable Adjustments Policy.

We will not discriminate against anyone who makes a complaint. If a complainant behaves inappropriately, we will seek to manage that behaviour as necessary and in line with the Unacceptable Behaviour Policy. All communication will be evaluated to consider the circumstances, including:

- Whether there is a likelihood that complaints are being made to intentionally cause harassment, divert resources or to cause disruption.
- Whether there have been persistent or unreasonable demands made in the past.
- Evidence of abusive or threatening behaviour to staff or producing excessive correspondence or making excessive communications.
- Whether the complainant displays unreasonable behaviour.

Complaints can be resolved at any stage of the complaints process, information on appropriate remedies are set out in the Housing Compensation Policy. Each complaint must be considered on the individual circumstances of the complaint and the person making the complaint. A blanket approach to complaints must not be taken, with each complaint being dealt with on its own merits and all relevant information and evidence considered.

1. Purpose

- 1.1 The Housing Complaints Policy sets out our approach to handling customer complaints relating to housing. All complaints are dealt with in-line with Castle Point Borough Council's Complaints Process and the Housing Ombudsman's Complaint Handling Code. All complaints should be welcomed, treated seriously and dealt with in a professional manner. We aim to resolve all complaints fairly, effectively and promptly.
- 1.2 Complaints are viewed as an opportunity for us to learn by identifying issues and introducing positive changes in service delivery. We reserve the right to use discretion when applying this Policy and may deal with a complaint differently where individual circumstances merit it. A high volume of complaints is viewed as a positive, as it demonstrates we have an accessible complaints process that our residents have confidence in.
- 1.3 A complaint is defined in the Housing Ombudsman Service's (HOS) Complaint Handling Code. For the purpose of this policy a complaint is "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Castle Point Borough Council, council staff or those acting on behalf of the council, affecting an individual resident or group of residents". This can include:
 - something we have said we would do – and didn't
 - the time it's taken us to sort out an issue
 - a decision we have made
 - something we have done – and shouldn't have done
- 1.4 The aim of this policy is two fold: firstly to provide clarity to the tenants and leaseholders of Castle Point Borough Council so they know how complaints can be made and how they will be handled. Secondly for members of staff who provide landlord services so they know how to receive a complaint and how complaints and residents must be treated. Our tenants and leaseholders can make a complaint to any member of staff however they choose including face to face, telephone or by email. A resident does not have to use the word "complaint" in order for it to be treated as such.

2. Scope

- 2.1 The policy covers the handling of complaints relating to properties owned and/managed by the Council's Housing Service, including rented and leasehold. Anyone that has a landlord/tenant relationship with us or has a service agreement related to accommodation with us. We will only consider complaints relating to a rehousing application in the way their application was managed under this policy.
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- 2.2 We will consider and recognise the difference between a service request and a complaint utilising the Housing Ombudsman's guidance and example case studies in the Complaint Handling Code. If a resident is dissatisfied with our response to their service request, it will be recorded as a complaint.
- 2.3 We will accept a complaint from a representative, including a MP or local

Councillor, who is authorised by the person wishing to make a complaint. This could be a friend or family member or a representative from an external organisation. We will require written permission from the person wishing to make the complaint.

2.4 We will consider each individual circumstance of each complaint request. We will not deal with complaints:

- that relate to an issue that occurred more than 12 months ago (we will apply discretion to this time limit where there are good reasons)
- where legal proceedings have started with a claim form filed at court
- if matters have previously been considered under the complaints policy

When we decide not to deal with a complaint, we will provide an explanation to the resident or representative and the contact details of the Housing Ombudsman.

2.5 Where a resident is seeking compensation for personal injury, the circumstances around the alleged service failure may be investigated as part of the complaints process but complainants will be advised to contact our insurers to respond to that aspect specifically regarding the personal injury claim.

2.6 The Housing Ombudsman will only investigate and adjudicate on complaints where there is, or was, a landlord/tenant relationship which includes customers who have a lease, tenancy, license to occupy, service agreement or other arrangements to occupy premises owned or managed by Castle Point Borough Council. A resident has the right to challenge any decision not to record a complaint with the Housing Ombudsman.

3 Policy Statement

3.1 Castle Point Borough Council is committed to handling complaints in accordance with the Housing Ombudsman Complaint Handling Code. We will:

- give the resident a fair chance to set out their position
- be easy to reach and helpful at all times, with a customer friendly process that enables residents to be heard and understood
- deal with complaints on their merits, acting independently with an open mind
- take measures to address any actual or perceived conflict of interest
- try to resolve our resident's problem as quickly as possible
- offer help and support to our residents
- fully investigate complaints, considering all relevant information and evidence carefully
- learn from our mistakes
- use complaints to improve the services we provide to our residents

3.2 Whenever we conduct a resident survey, we will always remind residents of how they can make a complaint if they wish to. When we are asking for wider feedback, we will also provide details of how they can make a complaint. Our Annual Tenant Satisfaction Measures (TMS) surveys are checked for expressions of dissatisfaction.

4. Related Documents

- Housing Compensation Policy 2025
- Housing Reasonable Adjustments Policy 2025
- Unacceptable Behaviour Policy 2024
- Housing Policy Statement

5. The Complaints process

5.1 We operate a two-stage complaint process each with clear timescales that are compliant with the Housing Ombudsman's Complaint Handling Code 2024. We will try to resolve a complaint at the first point of contact and provide the resident with a resolution to their complaint.

5.2 Complaints are owned by the relevant service area within housing and investigated by managers who have been trained in managing complaints in accordance with the Housing Ombudsman Complaint Handling Code.

5.3 The housing customer relations team role is to:

- provide oversight to ensure compliance with the complaints process
- consider which complaints can be responded to as early as possible, and which require further investigation
- support lead officers with formal written complaint responses
- provide oversight to enable compliance with the Housing Ombudsman Complaints Handling Code and the Housing Ombudsman dispute resolution principles
- consider the complexity of the complaint and whether the resident is vulnerable or at risk
- support residents in navigating the complaints process and keep them updated throughout the process

5.4 Complaints are formally acknowledged:

- All complaints will be acknowledged, either by letter or email, within 5 working days of the complaint being received. If clarity is required as to the outcomes being sought, or if the basis of the complaint is not clear, the customer relations team will make contact with the resident.
- Our acknowledgement will make it clear which aspects of the complaint we are, and are not responsible for, and clarify any areas with the resident where this is not clear. It will also set out the date the response is due.
- Residents will also be provided with details regarding their right to access the Housing Ombudsman Service for advice at anytime.

5.5 The housing customer relations team will:

- assess the complaint and determine the most appropriate service area to investigate
- discuss the complaint with the lead officer and allocate for investigation
- gain the correct authority for permission to share from the resident if the

complaint is made by a third party

6. The Complaint Stages

6.1 Stage 1 complaint

- 6.1.1 Complaints can be made through a range of ways, including by email, telephone, on-line, in writing or in person, and all staff should be able to take the details of a complaint and pass the details through to the relevant email contacts (housingcomplaints@castlepoint.gov.uk) to enable them to be correctly recorded and acknowledged. Unless a complaint or expression of dissatisfaction can be resolved within one day, it should formally logged and acknowledged.
- 6.1.2 All complaints must be confirmed as a failure of service before they are acknowledged as a complaint. Areas that are often confused as whether they should be dealt with as a complaint are:
- **Rent and Service charge** – the level of rent increase or the reasonableness of a service charge should not be deemed a complaint, unless the complaint is about our failure to manage the process, or services were not delivered.
 - **Anti-social Behaviour** - should not be recorded as a complaint, unless the complaint is regarding how we have handled a report of ASB.
 - **Allocations and Lettings** – decisions regarding lettings will be dealt with under the Allocations and Lettings Policy unless the handling of an application has not followed our policy and/or Policy.
- 6.1.3 If a decision is made not to accept a complaint, an explanation will be provided to the resident. It will set out the reasons why the matter is not suitable for the complaints process and advise them that they can contact the Housing Ombudsman for advice.
- 6.1.4 Once a formal acknowledgement has been sent to advise that the complaint has been logged and is currently being investigated a folder should be set up in the shared complaints folder for all documents and communications related to the complaint to be saved into. The response date will be 10 working days from the day the acknowledgement was sent.
- 6.1.5 Once a complaint has been logged it should not be withdrawn unless it was raised in error. All complaints that are received should be dealt with in line with this policy and any issues not covered under landlord responsibilities should be made clear to the complainant.
- 6.1.6 Complaints should be logged and recorded by the service area that the complaint is for, and which category the complaint falls into and an overview of the complaint. If a complaint is against a contractor working on behalf of the council the contractor will be asked to investigate and provide sufficient information to enable a response to be drafted unless delegation for the response has been agreed.
- 6.1.7 Once a complaint has been registered it will be assigned to lead officer (a manager) who will be responsible for carrying out an investigation into the issues raised. This should involve discussions with others and checking existing records to establish whether the issue has been raised before.

- 6.1.8 The lead officer may contact the complainant to clarify exactly what the issue is and how they would like to see it resolved. If the problem is a reoccurring issue they should consider any previous reports as part of the background to the complaint if this will help to resolve the issue.
- 6.1.9 The lead officer must consider the complaint in full to enable them to decide whether or not the complaint should be upheld. If an extension is required, this should be agreed with the complainant along with dates to keep them updated while the investigation is ongoing.
- 6.1.10 Extensions should not be more than 10 working days, and the complainant advised of the contact details of the Housing Ombudsman and their right to contact them. Where a response cannot be sent within 10 working days, the customer relations officer will agree with the resident suitable intervals for keeping them informed about their complaint and provide details of how to contact the Housing Ombudsman Service.
- 6.1.11 At stage 1 the lead officer will:
- consider any vulnerabilities and consider any urgent actions that may be necessary
 - fully investigate the complaint
 - keep the resident informed of the progress of the complaint
 - send a full written response and confirmation of the agreed actions for any proposed resolution within 10 working days of the complaint being acknowledged that addresses all points raised in the complaint and provide clear reasons for any decisions
 - address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice
- 6.1.12 A complaint response should be provided when the answer to the complaint is known. This may be before the actions needed to resolve the complaint are completed. In such cases the outstanding actions must be actioned promptly and tracked until complete, with updates provided to the complainant until all actions are complete.
- 6.1.13. Finally the housing customer relations team will:
- check any learning identified is fully recorded
 - close the complaint if no further contact is received from the resident after 10 working days of the resolution offer being sent
 - ensure a full record of the complaint and the outcomes at each stage, retaining all relevant documents
 - add any outstanding actions to our complaints tracker, so they can be actioned promptly and appropriate updates provided to the resident
- 6.1.14 If additional complaints are raised during the investigation, these must be incorporated into the stage 1 response if they are related, and the response has not yet been issued. Where the stage 1 response has been issued, or the new issues are unrelated to the issues already being investigated or it would

unreasonably delay the response, the new issues will be logged as a new complaint.

6.1.15 All stage 1 responses will follow our template that will confirm in writing 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 and timescale
- f) details of any outstanding actions and timescale
- g) details of how to escalate the matter to stage 2
- h) contact details of the Housing Ombudsman Service

6.2 Stage 2 complaints

6.2.1 If the complainant remains dissatisfied, they can request to escalate to stage 2 within 28 days of the receipt of the stage 1 response. This should be acknowledged within 5 working days and the complaints folder checked to ensure it includes all related information needed to carry out the stage 2 investigation. Residents are not required to explain their reasons for requesting escalation to stage 2 and the person considering the stage 2 must not be the same person who dealt with the complaint at stage 1.

6.2.2 We may ask the resident to allow us time to carry out the actions set out in our stage 1 response, before they escalate their complaint to stage 2 of the process. Where we do this we will set out the reasons why it is not suitable for the complaint to be escalated and the right to take the decision to the Housing Ombudsman Service.

6.2.3 At stage 2, the Directors are responsible for carrying an independent review of the stage 1 response. Their investigation should focus on the handling and reasonableness of the complaint at Stage 1 and whether Housing agreed policies and practices have been followed.

6.2.4 No new unrelated complaint issues should be considered at this stage. If new issues are raised this should be dealt with as a new complaint.

6.2.5 A full written response should be sent within 20 working days from the stage 2 acknowledgement being sent. Complaints should not ordinarily be extended at this stage unless in exceptional circumstances and if required, no more than 20 working days.

6.2.6 The housing customer relations team will:

- ensure there is a clear understanding about why the resident is dissatisfied with the stage 1 response and if required make contact with the resident to clarify
- acknowledge to the resident that the complaint has been escalated to a stage 2 in writing within 5 working days
- prepare a stage 2 assessment pack detailing the actions taken to date, the reasons for dissatisfaction, highlight any deficiencies or gaps in the

stage 1 investigation response or compliance with the Housing Ombudsman Complaints Handling Code

- where a response cannot be sent within 20 working days the complaints officer will send the resident a holding response advising the reasons why and when the resident can expect a response, with details of the Housing Ombudsman Service

6.2.7 The stage 2 investigating officer will:

- investigate the complaint under stage 2 by making contact with the resident ensuring all relevant parties are consulted at the appropriate level to ensure the reason for dissatisfaction is responded to and any identified risks are managed
- assess any vulnerabilities and any actions that may be necessary
- provide a written stage 2 response in plain language when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed
- that confirms the following:
 - 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 and timescale
 - f. the details of the learning
 - g. the details of how to escalate the matter to the Ombudsman if the individual remains dissatisfied
- address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice
- ensure systems are in place to monitor and track the actions promised to resolve all complaints and that they are completed within appropriate timescales
- ensure that all learning identified is progressed including amendments to policies and procedures

6.2.8 If no contact has been made within 2 weeks of the stage 2 response being sent, the complainant may be contacted to check they understood the response, and whether they felt the matter was resolved.

6.3 Remedies

6.3.1 Each case needs to be considered on its own merits and circumstances. We will use the Housing Ombudsman [guidance on remedies](#) to decide what the most appropriate remedy is in each individual case. Questions that will help us decide

what the appropriate remedy to a complaint is include the following:

- what has gone wrong?
- can it be put right – what actions could be taken to remedy the situation?
- how has the complainant been adversely affected?
- is there an actual quantifiable financial loss – for example, has the complainant incurred costs as a result of what happened, or not received payments that they should have?
- what other impact has there been (for example distress caused)?
- did the complainant's actions or inactions, or those of a third party (for example a complainant's advocate), contribute to what happened in the case?
- what remedy would be proportionate, appropriate and reasonable in the circumstances of the case

6.3.2 Where something has gone wrong, we will acknowledge an error has occurred, and set out the actions we have already taken, or intend to take (with a timescale) to put things right.

6.3.3 We will consider the cumulative impact of any service failure. The impact experienced by the complainant could include distress and inconvenience, time and trouble, disappointment, loss of confidence, and delays in getting matters resolved.

6.3.4 We will endeavour to agree any remedy with the resident, setting out what will happen, and the timescale. We will follow through any proposed remedy making sure it is completed in a timely way.

7 Complaints referred to the Housing Ombudsman Service

7.1 Residents have the right to refer their complaint to the Housing Ombudsman at any point during the investigation and details of how to do this will be included in the complaint correspondence. The Housing Ombudsman will not begin their own investigation into the council's complaint handling until the stage 2 complaint process has concluded.

7.2 Following the exhaustion of the council's complaints process, complaints may be investigated by the Housing Ombudsman Service and the resident can refer their complaint to them.

7.3 The complaints team will:

- respond to all correspondence and requests for information from the Housing Ombudsman within the specified timescales
- review the outcome of the Ombudsman's investigation and either accept the outcome or ask for a review of the decision
- where we accept the outcome of the Ombudsman's investigation we will act upon any findings or recommendations by them
- work closely with the relevant senior officer to respond to the Ombudsman within their given timescales

8 Self-assessment reporting and compliance

- 8.1 Castle Point Borough Council has appointed the Complaints Monitoring Officer as our complaints lead (Assistant Director – Legal and Democratic Service & Monitoring Officer). The complaints lead will meet regularly with the senior Leadership team to ensure learning from complaints feeds into improvement plans for all service areas.
- 8.2 We will undertake an annual self-assessment (See Appendix A) against the complaint handling code, this will be published on our website. We will undertake a review sooner, if directed by the Housing Ombudsman Service, or if we have a change in system or procedures.
- 8.3 The Assistant Director of Housing Health and Partnerships will produce an annual complaints performance and service improvement report for scrutiny and challenge that will be shared with our involved residents, senior leadership team and cabinet to include:
- a) our annual self-assessment against the Housing Ombudsman Complaint Handling Code 2024 to ensure our complaint handling policy remains in line with the requirements, repeated more frequently following a restructure or merger.
 - b) a qualitative and quantitative analysis of Castle Point Borough Council’s complaint handling performance. This will also include a summary of the types of complaints we have refused to accept
 - c) any findings of non-compliance with the Complaint Handling Code by the Ombudsman
 - d) the service improvements we have made as a result of the learning from complaints
 - e) any annual report about the landlord’s performance from the Ombudsman
 - f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the council
- 8.4 The annual complaints performance and service improvement report will be published on the complaints section of our website. The Assistant Director for Housing, Health and partnerships will report back on wider learning and improvements from complaints to stakeholders, involved residents, and staff. A formal report will be made to the Council Audit and Governance Committee and Cabinet.
- 8.5 All complaints must be recorded on the Complaints Spreadsheet and a folder set up for each complaint. This will monitor complaint categories, relevant dates, outcomes and learnings. A quarterly report on complaints will be produced by the Housing Customer Relations Officer.

9 Communications & Training

- 9.1 All customer facing staff must be trained and aware of the Complaints Policy, and any related Policies, and their responsibility in handling complaints. The Ombudsman’s e-learning modules are available for all staff involved in the complaint process.

- 9.2 All staff and contractors will take a collaborative and co-operative approach to resolving complaints promptly and work together to take collective responsibility for any failing, acting professionally and adopting the principles set out in this Policy.
- 9.3 Information on how to make a complaint will be available in a clear and accessible format and readily available through all communication channels. Including details of the Housing Ombudsman and the Compliant Handling Code.

10 Review

- 10. This Policy will be reviewed annually or earlier if there is a significant restructure or change in regulatory requirements.

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints' performance and service improvement report on their website. The governing body's response to the report must be published alongside this. Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Para. 1.3 of the Council Housing Complaints Policy (the policy) sets out this definition	Definition in line with the Complaint Handling Code
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	Para. 1.4 of the policy	Residents do not have to use the word complaint
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	Para. 2.2 of the policy	We use the Ombudsman guidance on service requests and complaints
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	Para. 2.2 of the policy	Dissatisfaction with a response to a service request will be recorded as a complaint

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	Para. 3.2 of the policy	During the TSM survey 8 residents expressed dissatisfaction, 3 of these were later logged as a complaint
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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	Para. 6.1.3 of the policy	All complaints are considered on its own merits
2.2	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Yes	Para. 2.4 of the policy	Sets out issues that are excluded from the complaint process
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	Para. 2.4 of the policy	Allows discretion when dealing with complaints

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	Para. 2.4 of the policy	An explanation will be provided if a complaint is not accepted
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Introduction section of the policy	All complaints are considered on their own merits

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	Introduction section and para. 6.1.1 of the policy	Complaints can be made in any way and reasonable adjustments used
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	Para. 6.1.1 of the policy	All housing staff have undergone training to ensure they are aware
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	Para. 1.2 of the policy	Complaints are welcomed
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	Para. 9.3 of the policy and policy statement	A copy of the policy statement is included with our complaint acknowledgement
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	Para. 9.3 of the policy	Details of the policy are available on the website

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	Para. 2.3 of the policy	Complaints can be made by a third party on behalf of a resident
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	Sections 6 and 7 of the policy	Details of the Ombudsman are provided in all complaint communications

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	Housing Customer Relations Officer in post from February 2024	Responsible for co-ordinating the complaints process
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	Section 9 of the policy	All staff are aware of the importance to prompt resolution
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 complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Introduction and section 9 of the policy	All staff have undertaken complaint handling training

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	Council Housing Complaint Policy	We do not discriminate against anyone making a complaint
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	Section 5 of the policy	The Council do not have an informal complaint stage
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	Section 5 of the policy	The Council operate a 2 stage complaint process
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	n/a	All housing related complaints are dealt with internally	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	n/a	As above	

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	Para. 5.4 and 6.1.8 of the policy	The officer responsible for the complaint will contact the resident to clarify if necessary
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.	Yes	Para. 5.4	If we are not responsible for an aspect of a complaint this will be fully explained
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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 d. consider all relevant information and evidence carefully. 	Yes	Para. 3.1 of the policy	All staff have had training on the importance of complaint handling
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	Para. 6.1.9 and 6.2.5 of the policy	Extensions to timescales are discussed and agreed with the resident

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.	Yes	Introduction section of the policy and the Reasonable Adjustment Policy	All staff have had training on understanding and identifying when a reasonable adjustment may be appropriate
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.	Yes	Para. 6.2.2 of the policy	Residents are not required to explain their reasons for escalation
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	Para. 6.1.13 of the policy	All records relating to complaints are held centrally
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	Introduction and section 6.3 of the policy	We are committed to resolving complaints quickly
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.	Yes	Introduction section of the policy and our Unacceptable Behaviour Policy	We follow our corporate Unacceptable Behaviour Policy

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.	Yes	Unacceptable Behaviour Policy	Any restrictions put in place are done so after consideration of the residents needs
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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	Council Housing Complaints Policy	Housing complaints are handled in line with our Complaints Process and aims to resolve complaints promptly whenever possible
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Para. 5.4 of the policy	All complaints are acknowledged within 5 working days
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Para. 6.1.4 of the policy	Whenever possible complaints are responded in full within 10 working days
6.4	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 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Para. 6.1.9 of the policy	Extensions are always discussed with 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	Para. 6.1.10 of the policy	Written confirmation of an extension is accompanied with details of the Ombudsman
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	Para. 6.1.12 of the policy	Responses are issued when the answer is known
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	Para. 6.1.11 of the policy	All points raised in a complaint are addressed in the response
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 investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Para. 6.1.14 of the policy	Additional issues can only be added to a complaint if they are related and the response has not yet been sent

6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> 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	Para. 6.1.15 of the policy	Responses are set out in clear, plain language
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Stage 2

Code provision	Code 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	Para. 6.2.1 of the policy	Residents dissatisfied with their stage 1 response are progressed to stage 2
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Para. 6.2.1 of the policy	All requests for escalation are acknowledged within 5 working days

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	Para. 6.2.1 of the policy	Residents do not have to give a reason for escalation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Para. 6.2.1 of the policy	Stage 2 investigations are carried out by a more senior officer
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Para. 6.2.5 of the policy	Whenever possible stage 2 complaints are responded in full within 20 working days
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.	Yes	Para. 6. of the policy	Extensions are always discussed with the resident
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	Para. 6.2.6 of the policy	Written confirmation of an extension is accompanied with details of the Ombudsman
6.17	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	Para. 6.2.7 of the policy	Responses are issued when the answer is known

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	Para. 6.2.7 of the policy	All points raised in a complaint are addressed in the response
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> 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	Para. 6.2.7 of the policy	Responses are set out in clear, plain language
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Para. 6.2.8 of the policy	All relevant staff are part of the investigation

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	Section 6.3 of the policy and the Housing Compensation Policy	All remedies will be considered as part of a resolution
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Para. 6.3.1 of the policy	The impact on the resident will always be considered
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	Para. 6.3.2 of the policy	Response letters set out details of remedies offered
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Para. 6.3.1 of the policy	The Ombudsman remedy guidance was used to develop the Compensation Policy

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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	Section 8 of the policy,	(insert link to website)
8.2	<p>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.</p>	Yes	Para. 8.3 and 8.4 of the policy	(insert link to website)

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Para. 8.2 of the policy	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Para. 8.2 of the policy	
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	We would notify the Ombudsman if this happened	

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	Para. 6.1.13 and 6.2.7 of the policy	Learning from complaints are published in our annual report
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	Para. 8.3 of the policy	All complaints are considered for learning and to identify trends and service improvements
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	Para. 8.3 of the policy	The annual complaints report includes learnings and improvements
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	Director for Place and Communities	Supported by the Assistant Directors and Senior Leadership Team in monitoring complaint handling
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	Councillor with Portfolio for Health, Wellbeing and Housing	

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	The MRC meets regularly with the Chief Executive	Complaint performance is provided quarterly
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 d. annual complaints performance and service improvement report.	Yes	Para. 8.5 of the policy	The MRC receives a quarterly update on complaints, including Ombudsman investigations
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 co-operative 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.	Yes	Para. 9.2 in the policy	All staff are aware of their individual and collective responsibilities in complaint handling