



**Westmorland
& Furness
Council**

HOUSING OMBUDSMAN'S COMPLAINT HANDLING CODE COMPLIANCE SELF-ASSESSMENT 2024

This self-assessment sets out the current processes Westmorland and Furness Council has in place to comply with the Housing. Ombudsman's Complaint Handling Code.

Further detailed compliance with the code is evidenced within our Policy, Procedure and associated documentation which are accessible either on our website or upon request in a format to meet your requirements.

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	<u>Evidenced:</u> Policy - Page 2 Website	Our Policy, Procedure include the complaint definition as detailed 1.2.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlord must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<u>Evidenced:</u> Policy- Page 2 Website	Our Policy sets out that: <ul style="list-style-type: none"> The resident does not have to use the word complaint for it to be treated as such A complaint that is submitted via a third party or representative will be handled in line with the landlord's complaints policy.
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	<u>Evidenced:</u> Policy- Page 2 Appendix 2	Our Policy sets out the definitions of a Service Request Staff training
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	<u>Evidenced:</u> Website	The information on the housing pages of the website explains this to residents and staff guidance clearly explains this.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
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.	No		This has been recognised and included within the next survey and will form part of any future surveys carried out.

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	<u>Evidenced:</u> Policy- Page 3 Appendix 2	We will accept all complaints unless there is a valid reason not to do so as detailed within our Policy and appendix.
2.2	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: <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. 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.	Yes	<u>Evidenced:</u> Appendix 2 of the policy	Our Policy clearly sets out where a matter will not be accepted as a complaint.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so			
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	<u>Evidenced:</u> Policy- Page 4	Our Policy states that we will accept complaints referred within 12 months of issue, in addition will apply discretion to accept complaints made outside of this time limit.
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	<u>Evidenced:</u> Website	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<u>Evidenced:</u> Policy- Page 2	

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	Yes	<u>Evidenced:</u> Website	There are multiple options available on the website to enable people to make complaints in different ways to have

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	adjustments of residents who may need to access the complaints process.			<p>regard for individual needs and preferences.</p> <p>The housing management system also records communication information about tenants where we have consent to do so and officers have access to this information.</p>
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	<p><u>Evidenced:</u></p> <p>Policy sets out responsibilities</p> <ul style="list-style-type: none"> • Website 	<p>Website provides different ways to complain and all frontline staff and also those who may have contact with residents are aware of the complaints policy, process.</p> <p>Roll out of new corporate policy will include training. all times on our website and internal intranet.</p>
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	<p><u>Evidenced:</u></p> <p>Internal guidance and supervision with management</p>	<p>This is actively discussed at meetings and in one to ones with staff.</p>
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	<p><u>Evidenced:</u></p> <p>Policy</p> <p>Website</p>	<p>Alternative formats are available and we hold information on individual communication needs on the housing management system which we would have due regard to.</p>
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	<p><u>Evidenced:</u></p> <ul style="list-style-type: none"> • Website • Newsletters 	<p>Information on the complaints policy and process are well publicised to residents in different formats including the twice yearly newsletter and also leaflets available in</p>

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
			<ul style="list-style-type: none"> • Leaflets 	customer service area. This sits alongside website information.
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	<u>Evidenced</u> Policy – Page 2 Website	Our Policy state that Complainants will be given the opportunity to have a representative deal with their complaint on their behalf.
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	<u>Evidenced</u> <ul style="list-style-type: none"> • Website • Policy • Newsletter • Leaflets • Correspondence sent in relation to the complaint 	We provide residents with the Housing Ombudsman’s contact details in a range of different areas, including: <ul style="list-style-type: none"> • Our website • Leaflets • Policy • All formal correspondence with the resident whilst the complaint is ongoing • Newsletter

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	<u>Evidenced:</u> Policy- Page 3, 6 and 7	Our Policy sets out responsibility for dealing with complaint handling absence of or if it was deemed not appropriate to be carried out by the Complaints Officer.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
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	<u>Evidenced:</u> See narrative	The Complaints Officer has knowledge of the relevant staff at all levels to ensure a timely and fair 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	<u>Evidenced:</u> See narrative	Dedicated officer who deals with complaints from start to end. Staff have training and guidance on complaint handling. Quarterly meetings with senior officers and management includes a review of complaints performance, looking at trends, common issues. TSM action plan around feedback on complaints.

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	<u>Evidenced-</u> Policy Website	We have a single policy in place which is publicised on our website, the website also provides further information
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	<u>Evidenced:</u> Policy Website	We only have stage 1 and stage 2

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
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	<u>Evidenced:</u> Policy Website	No stage 3
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	<u>N/A</u>	Complaints owned by the Council
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	<u>Evidenced:</u> Policy Website	Templates include the definition. Where further information is required, this will form part of the initial contact with the relevant senior officer/manager.
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	<u>Evidenced:</u> Policy	Template letters include 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;	Yes	<u>Evidenced:</u> Policy- Pages 3-6	Complaints are dealt with impartially and information collected from both parties so that fair and appropriate findings and recommendations can be made.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully</p> <p>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.</p>			<p>Complaint handlers are experienced and know to act independently and with an open mind. They will not be assigned the complaint if they've had any prior involvement.</p>
5.9	<p>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.</p>	Yes	<p><u>Evidenced:</u> Policy- Page 4</p>	<p>We aim to deal with all of our complaints within the set timescales. If there was a delay, the customer would be provided an explanation for the delay and also be kept up to date thereafter. This is clear within managers guidance.</p>
5.10	<p>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.</p>	Yes	<p><u>Evidenced:</u></p> <ul style="list-style-type: none"> • Policy • Website • Housing • Management System 	<p>The website sets out the Council's approach to Equality and Diversity.</p> <p>A record of any reasonable adjustments/disabilities are stored and reviewed using our Housing Management system Cx.</p>
5.11	<p>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.</p>	Yes	<p><u>Evidenced:</u> Policy- Pages 4 and 5</p>	<p>We would not refuse to escalate a complaint to the next stage of our process</p>
5.12	<p>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,</p>	Yes	<p><u>Evidenced:</u></p>	<p>Complaints are held and records kept of complaints within the Democratic Services Dept.</p>

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		Policy- Pages 6 and 7	
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	<u>Evidenced:</u> Website	We have a dedicated Complaints Officer, Service Managers are responsible for providing appropriate remedies to resolve the complaint and do so at any stage as appropriate.
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	<u>Evidenced:</u> Policy Page 7 Appendix 3	
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	<u>Evidenced:</u> See narrative	Equality and Diversity training takes place annually and officers dealing with complaints and making such decisions have regard to this in making those decisions/adjustments. Dedicated health and safety team can advise as necessary. SLA with ASB consultancy and Equality and Diversity service for further support/legal advice.

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	<u>Evidenced:</u> See narrative	Experienced managers Damp and Mould Standard Policy sets out this approach
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	<u>Evidenced:</u> Policy – Page 3	Our Policy and Procedure sets out that Stage 1 complaints are acknowledged, defined and logged within five 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	<u>Evidenced:</u> Policy – Page 3	All of our complaints are responded to within 10 working days. If there are delays, the Code is followed.
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	<u>Evidenced:</u> Policy – Page 4 Website	
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	<u>Evidenced:</u> See narrative	Housing Ombudsman Details are provided within our extension agreement contact.
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	Yes	<u>Evidenced:</u> Website	This is set out on the website and within additional guidance issues to senior officers and managers

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		Guidance	
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	<u>Evidenced:</u> Policy Page 5	
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	<u>Evidenced:</u> Website	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <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. the details of any remedy offered to put things right 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	<u>Evidenced:</u> Policy Page 5	Additional guidance for managers sets this out

STAGE 2 FORMAL COMPLAINT

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	<u>Evidenced:</u> Policy Page 5 Website	If the complainant remains dissatisfied with the response at Stage 1 they can escalate to Stage 2 of the Formal Complaints process
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	<u>Evidenced:</u> Policy Page 3 Website	Our Stage 2 Formal Complaint acknowledgement letter includes: <ul style="list-style-type: none"> • our understanding of the outstanding issues • the outcome required by the resident <p>If any of these issues are unclear we will seek clarity from the resident that our understanding of their escalation request is correct. The complaint will be defined and logged within five working days.</p>
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	<u>Evidenced:</u> Website	If the complainant remains dissatisfied with the response they can escalate to Stage 2 of the Formal Complaints process without being expected to explain their reasons. We advise they should explain but do not require them to.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Evidenced:</u> Policy Page 4	We have separate officers dealing with Stage 1 and Stage 2 Formal Complaints.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
				<ul style="list-style-type: none"> • Stage 1 Formal Complaints are dealt with by the appropriate senior officer or manager • Stage 2 Formal Complaints are dealt with by a Senior Manager or Assistant Director
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	<u>Evidenced:</u> Policy Page 3 Website	All of our complaints will be responded to 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	<u>Evidenced:</u> Policy Page 4	
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	<u>Evidenced:</u> See narrative	Housing Ombudsman Details are provided at various stages
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	<u>Evidenced:</u> Website	Managers guidance sets this out. Plans to enhance the way the housing management system records and monitors complaints will improve this further.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	<u>Evidenced:</u> Policy	Managers guidance sets this out See 6.9

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	referencing the relevant policy, law and good practice where appropriate			
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on the complaint; • the reasons for any decisions made; • the details of any remedy offered to put things right; • details of any outstanding actions; and • details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<u>Evidenced:</u> Managers guidance	Managers guidance sets this out
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<u>Evidenced:</u> Policy Page 5 Website	Our Stage 2 Formal Complaints are dealt with and a formal response issued by the investigating officer

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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; 	Yes	<u>Evidenced:</u> Policy page 4 and 5 Website Managers' guidance	We will always acknowledge where something has gone wrong and will set out in our formal complaint response letters the actions we have already taken or intend to take to resolve the issues.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	<ul style="list-style-type: none"> • 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 practice			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<u>Evidenced:</u> See narrative	Managers guidance provides further advice on this
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	<u>Evidenced:</u> Narrative	Our Formal Complaint response letters set out details of any remedies offered/accepted and this would also be discussed in person with the tenants out of courtesy
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<u>Evidenced:</u>	We have regard to the guidance but we need to embed this within the policy and managers guidance

SECTION 8: SELF-ASSESSMENT, REPORTING & COMPLIANCE

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: <ol style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 	Yes	<u>Evidenced:</u> Quarterly meetings Service report	We produced an annual report which includes items (a-d) of 8.1.

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	<ul style="list-style-type: none"> 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. 			
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<u>Evidenced:</u> Report on website	As 8.1 – in addition the governing body's response to the report published
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		<u>Evidenced:</u> This is the 1 st one since the merge to become W&FC Another planned once new policy is approved	Since the implementation of the Complaints Handling Code we have completed and published our first self-assessment. As there is a new policy and team for handling complaints due to be approved later this year, another self-assessment will be carried out.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<u>Evidenced:</u> See commentary	W&FC are committed to update and review the self-assessment if required

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
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	<u>Evidenced:</u> See commentary	W&FC are committed to informing the Ombudsman if they are unable to comply with the code due to exceptional circumstances.

SECTION 9: SCRUTINY & OVERSIGHT: CONTINUOUS LEARNING & 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	<u>Evidenced:</u> <ul style="list-style-type: none"> • Tenants Forum • Quarterly meetings • Staff development • Annual performance review • TSM 	We capture/share this information by: <ul style="list-style-type: none"> • Residents via our newsletter • Performance report • Tenants' Forum Any identified actions are allocated to the appropriate person to take forward
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	<u>Evidenced:</u> See narrative	We embed this approach through training, staff inductions and team meetings. We encourage complaints and tenant views to be shared via Tenants' Forums and representatives
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	<u>Evidenced:</u> Tenants' Forum Policy Page 7	See 9.1

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
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	<u>Evidenced:</u> See narrative	Interim Senior Manager and Assistant Director have this responsibility The development of the MRC role will also assist with this
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').	Partially	<u>Evidenced:</u> See narrative	There is a lead member for Housing who has oversight of complaints by attending tenant forum meetings, feeding back from other committees/meetings; receiving minutes from management meetings, TSM reports and also the annual report and service improvement plan. The role needs to be refined within her responsibilities in a more effective way, which we have included in the service improvement plan.
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.	Partially	<u>Evidenced:</u> See narrative	See above 9.5
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;	Yes	<u>Evidenced:</u> <ul style="list-style-type: none"> • Agenda/Minutes • Regular meetings with the AD of Housing • TSM reports • Annual report 	This is all in place via meetings attended and minutes provided from those where complaints are discussed/reviewed. Annual reports are shared and discussed in more detail with Lead Member

Code Provision	Code requirement	Comply: YES/NO	Evidence	Commentary/explanation
	<ul style="list-style-type: none"> 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. 			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> 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. 	Yes	<p><u>Evidenced:</u> Policy Page 1</p>	