# Appendix 1: City of Lincoln Council - Annual Complaints Self-assessment 2024-2025

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# Section 1: Definition of a complaint

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| 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 | This is section 3.1 of the corporate complaints policy. |  |
| 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 | See section 3.2 of the corporate complaints policy. | We consider that this provision has led to an increase in the number of complaints recorded over this year compared to previous years. See below.2021-2022 – 392 complaints2022-2023 – 459 complaints2023-2024 – 418 complaints2024-2025- 562 complaints |
| 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 | See sections 3.4 through 3.6 of the corporate complaints policy. | Quite often a customer will state that they want to complain that their refuse has not been collected. In this instance – where this is a one-off service request, and the customer is satisfied when we either return to rectify the missed collection or explain the reasons why their bin has not yet been emptied. This is not recorded or dealt with as a complaint. |
| 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 | See section 3.6 of the corporate complaints policy. |  |
| 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 | See section 3.7 of the corporate complaints policy. In all surveys sent to tenants and general citizens surveys we include the following statement: “If you would like to make a complaint about any of our services you can do this by completing our on-line form at <https://lincoln.gov.uk/y/provide-us-feedback> or call our Customer Services team on 01522 881188” |  |

# Section 2: Exclusions

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| 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 | See Section 6 of our corporate complaints policy which sets out the limited circumstances when we would justify excluding a complaint from the process.  | We have no recorded instances of any complaints being refused during the year. |
| 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:* 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 | See Section 6 of our corporate complaints policy which sets out the limited circumstances when we would justify excluding a complaint from the 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 | Section 6.2 of the corporate complaints policy. | Where a customer had good reason for a delay in complaining we would always consider and investigate the complaint. |
| 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 | Section 6.5 of the corporate complaints policy. | There have been no excluded complaints in the last 12 months and therefore we have not had to apply this part of the policy. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Section 6.1 through 6.5 of the corporate complaints policy. Each complaint received will be considered under the provisions set out in our policy. |  |

# Section 3: Accessibility and Awareness

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| 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 | See section 7 of the corporate complaints policy | We accept complaints via any channel which the customer wishes to use. Where a customer makes a verbal complaint, it is often to a Customer Service adviser who will complete the online complaint form on behalf of the customer if possible. This is to ensure that as much relevant data as possible is captured and provides an audit trail for the complaint. |
| 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 | See section 7 of the corporate complaints policy.  | The complaints officer has completed a staff briefing shared with all staff either in meetings or via a recording published on the Hub. This sets out the provisions of the policy and the important role of all staff in ensuring compliance. |
| 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 |  | We have seen an increase in the number of complaints recorded since changing our policy. See below.2021-2022 – 392 complaints2022-2023 – 459 complaints2023-2024 – 418 complaints2024-2025 - 562 complaintsThese complaints have been discussed and learning points recorded. |
| 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 | The policy is on our website. It can be viewed via this link: [Corporate\_customer\_complaints\_policy.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.lincoln.gov.uk%2Fdownloads%2Ffile%2F1771%2Fcorporate-customer-complaints-policy&wdOrigin=BROWSELINK) | We do not print leaflets as they go out of date easily and potentially deliver the wrong information. However, staff will print the policy and send in the post or issue to face to face customers on request. |
| 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 | See section 11 of the corporate complaints Policy which outlines how we will demonstrate our compliance with the code and where the public can access our reports. |  |
| 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 | See the corporate complaints policy - section 3.3 |  |
| 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 | See the corporate complaints policy section 7.4 and Appendix 1. All level 2 complaint response letters include information about the relevant Ombudsman Service and how to contact them. |  |

# Section 4: Complaint Handling Staff

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| 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 |  | The responsible person for handling and reporting on corporate complaints is the Customer Services Manager. |
| 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 |  | The Complaints Officer is able to contact staff at all levels including the CEO. As Customer Services Manager they are able to contact staff at all levels across the organisation and request information or escalate for action. |
| 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 |  | In addition to the Corporate Complaints Officer, each Directorate has its own Complaints Officer. Complaints Outcome forms are completed for all complaints, and these are monitored for trends, learning points and follow-up action. |

# Section 5: The Complaint Handling Process

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| 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 | The corporate complaints policy is applied across all services and for all complainants |  |
| 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 | We have a 2-stage complaints process which sees all complaints as ‘formal’. There are no informal levels or pre-complaint stages. |  |
| 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 | We have a 2-stage process which ends at the level 2 response. Complainants who remain dissatisfied at this stage are directed to the Ombudsman. |  |
| 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. | Yes |  | All complaints received about our services, whether they are delivered in-house or by a contractor are dealt with through our complaint policy. Customers are not directed to complain direct to the contractor. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes |  | All complaints received about our services, whether they are delivered in-house or by a contractor are dealt with through our complaint policy. Customers are not directed to complain direct to the contractor. |
| 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 | See corporate complaint policy section 4.10 |  |
| 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 | The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. |  |
| 5.8 | At each stage of the complaints process, complaint handlers must:  1. deal with complaints on their merits, act independently, and have an open mind.
2. give the resident a fair chance to set out their position.
3. take measures to address any actual or perceived conflict of interest; and
4. consider all relevant information and evidence carefully.
 | Yes | The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. |  |
| 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 | This is in our complaint handling guidance which is issued to all staff who investigate complaints. Section 2.6 of the guidance document refers. |  |
| 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 | Reasonable adjustments for residents are made where appropriate under the Equality Act 2010.  Individual vulnerability assessments or equality impact assessments are completed when appropriate. A full tenant census is in progress and providing updated information about the current needs of our tenants.  | The new housing system which is in the process of development will allow for improved recording and review of tenant needs and preferences.  |
| 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 | All valid complaints are investigated at level one and escalated to level two at the request of the complainant or their representative. |  |
| 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 | Records are currently kept in spreadsheets and individual files by the Directorate Complaints Officers. These are then sent to the Corporate Complaints Officer on a quarterly basis for reporting to Members and senior management. We are developing an automated process and database which will collate all the complaints in one place and make reporting a simpler process. |  |
| 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 | See section 9 of the corporate complaint policy and the separate DHI Remedies Policy. |  |
| 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  | The Unreasonable Customer Actions policy covers complainants as well as other kinds of unacceptable customer contact. |  |
| 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 | The Unreasonable Customer Actions policy has regard to the Equality act 2010 and other relevant legislation. | Where appropriate an Equality Impact Assessment will be undertaken before taking enforcement action. |

# Section 6: Complaints Stages

Stage 1

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| --- | --- | --- | --- | --- |
| 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 | The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. |  |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.  | Yes | The corporate complaints policy has this standard – see section 2.2 | Performance for 2024-2025 demonstrates that 100% of all complaints dealt with were acknowledged and allocated to an investigator within 5 working days. |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.   | Yes | The corporate complaints policy has this standard – see section 2.2 | We endeavoured to achieve full compliance, however there were 30 out of a total of 504 level 1 complaints responded to, which were not answered within 10 working days. This is a **94%** compliance at level 1 with 6% not reaching the target response time. We have made a huge improvement on 67% compliance last year, but we will work to achieve full compliance in the coming year. |
| 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 | Section 4.9 in the corporate Complaint Policy and set out in Complaint Handling Guidance section 2.6 |  |
| 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 | Section 4.9 in the corporate Complaint Policy and set out in Complaint Handling Guidance section 2.6 |  |
| 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 | See section 3.6 in the Complaint handling guidance for staff. This contains the text as set out in the commentary column to the right. | Where relevant, ensure that remedial work has been done or is planned to put things right as soon as possible. Where it has not yet been completed ensure that you follow-up the issue to make sure that the customer is satisfied that the issue has been resolved. |
| 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 | This is set out in our policy and in the complaint handling guidance issued to staff. See section 3. |  |
| 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 | Section 4.8 in the corporate Complaint Policy |  |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  1. the complaint stage.
2. the complaint definition.
3. the decision on the complaint.
4. the reasons for any decisions made.
5. the details of any remedy offered to put things right.
6. details of any outstanding actions; and
7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
 | Yes | This is set out in our corporate complaints policy at section 4.10.The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. It sets out clearly what information should be included in letters to the complainant.  |  |

Stage 2

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| 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 | The corporate complaints policy complies with this provision |  |
| 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 | The corporate complaints policy complies with this provision. Additionally, we have guidance documents setting out the process for all staff. |  |
| 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 | The corporate complaints policy complies with this provision |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.  | Yes | The corporate complaints policy complies with this provision | In the past this is an area where we have received a finding of maladministration from the HOS. We made a mistake where a staff member responded to the level 1 and then as they had been promoted to a senior position, they responded at the level 2 as well. This was an uncomfortable situation for the council and has been a lesson learnt.  |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.   | Yes | The corporate complaints policy has this standard – see section 2.2 | We endeavoured to achieve 100% compliance, however there were 12 out of 58 level 2 complaints responded to which were not answered within 20 working days. This is a compliance of just under 80%. level 2 complaints have performed worse than those dealt with at level 1, so this is an area that we need to focus on going forwards. |
| 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 | Section 4.9 in the corporate Complaint Policy and set out in Complaint Handling Guidance section 2.6 |  |
| 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 | Section 4.9 in the corporate Complaint Policy and set out in Complaint Handling Guidance section 2.6 |  |
| 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 | The principle is that the response should be sent at the earliest possible opportunity. See points 2.2 and 2.3 and 2.5 in our guidance to complaint handling staff.  |  |
| 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 | This is set out in our policy and in the complaint handling guidance issued to staff. See section 3. |  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  1. the complaint stage.
2. the complaint definition.
3. the decision on the complaint.
4. the reasons for any decisions made.
5. the details of any remedy offered to put things right.
6. details of any outstanding actions; and
7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.
 | Yes | This is set out in our corporate complaints policy at section 4.10.The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. It sets out clearly what information should be included in letters to the complainant. |  |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | The manner in which staff are expected to investigate and respond to a complaint is set out in the policy and also in internal staff guidance which exists to clarify how complaints should be approached and dealt with. |  |

# Section 7: Putting things right

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| 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: * 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 | This is set out in our corporate complaints policy at section 9 |  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes | Remedies outlined in the Remedies policy look at impact on the complainant as well as actual financial loss if applicable. |  |
| 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 | All upheld complaints are monitored to ensure that outstanding services are delivered and any redress that has been agreed is served. |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | The DHI remedies policy was developed to take reflect the HOS guidance on Remedies. |  |

# Section 8: Self-assessment, reporting and compliance

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| 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: 1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
2. 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.
3. any findings of non-compliance with this Code by the Ombudsman.
4. the service improvements made as a result of the learning from complaints.
5. any annual report about the landlord’s performance from the Ombudsman; and
6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
 | Yes | This is the first year since the Code was introduced, and we have been in a position to do the self-assessment having filled gaps in our existing provision.* 1. Our policy reflects the code and is in line with the provisions that it requires.
	2. The report details a quantitative analysis of the numbers of complaints and the response times. It also refers to the level of upheld complaints. We have not refused to accept any complaints this year.
	3. Ombudsman decisions are reported
	4. There is a section on lessons learnt and service improvements.
	5. Where available the Ombudsman annual report will be included
	6. Any reports or published decisions will be included
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| 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 | The annual Complaints Performance and Service Improvement Report will be reported to Performance Scrutiny Committee on 22 May 2025. Once commented on it will be published on our website and submitted to the Housing Ombudsman Service by the deadline date of 30 June 2025 |  |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Not applicable during the period covered by this report. |  |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Not applicable during the period covered by this report |  |
| 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 | Not applicable during the period covered by this report |  |

# Section 9: Scrutiny & oversight: continuous learning and improvement

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.  | Yes | Annual Complaints Performance and Service Improvement Report being presented to CMT (6 May 2025) and Performance Scrutiny Committee (22 May 2025) |  |
| 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 |  | All upheld complaints are examined to identify lessons learnt and opportunities for service improvements and changes to process. Lessons earned are recorded and reported on. These are discussed at Directorate management level. |
| 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 | The lessons learnt from complaints will form part of the Annual Complaints Performance and Service Improvement Report. This will be presented to our Tenants Panel as well as elected members. It will be available on our website for public scrutiny |  |
| 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 | Customer Services Manager  |  |
| 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 | This is our Portfolio Holder for Customer Experience, Review and Resources.  | Our current MRC has attended the 2024 conference for MRC’s held by the HOS |
| 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 |  |  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: 1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.
2. regular reviews of issues and trends arising from complaint handling.
3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and
4. annual complaints performance and service improvement report.
 | Yes | Volume, outcomes and complaint handling performance are reported to the MRC at a quarterly meeting. Outcomes from Ombudsman investigations are reported quarterly via CMT and to the MRCAnnual Complaints Performance and Service Improvement Report being presented to CMT (6 May 2025) and Performance Scrutiny Committee (22 May 2025) |  |
| 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: 1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.
2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
3. act within the professional standards for engaging with complaints as set by any relevant professional body.
 | Yes | This is a standard requirement under the corporate section of every job description |  |