

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	No	To avoid any confusion, the Housing Complaints Policy uses the same definition as the Council’s corporate complaints policy, which is the definition provided by the Local Government and Social Care Ombudsman and is very similar.
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	In our Complaints Procedure it is noted that it is not necessary for the complainant to use the word ‘complaint’ for it to be deemed as a complaint. Ref: Housing Complaints Procedure, page 3. When a complaint is made by a third party or representative, it is accepted on the basis that we receive confirmation from whom it is on behalf of. Ref: Complaints Policy for Housing Service, 2.9
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	A complaint is routinely logged when it is first received from a customer, both corporately and in a separate log of housing complaints Ref: Housing Complaints Procedure, Page 4, step 2
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Unless a complaint has been dealt with previously or is defined as unreasonable, we will accept it. Ref: Complaints Policy, page 4, section 2.13

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	The Housing Complaints policy explains the circumstances and this is currently considered fair but we will seek the view of tenants on this. Ref: Housing Complaints Policy, section 2.13
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	The resident will receive a letter containing a clear explanation as to why it will not be accepted, and the Ombudsman's details should they want to take that decision to them. Ref: Complaints Procedure, page 2, point 1.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Our policy states: 'All staff are responsible for taking appropriate steps to resolve issues appropriately for residents as early as possible and for recognising when a repeated service failure is to be treated as a complaint.' The Procedure states that it is not necessary for the complainant to use the word 'complaint' for it to be deemed as a complaint. Staff training followed the implementation of the Policy and Procedure in January 2021 and refresher/new staff training is provided regularly.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	No	If a tenant expresses dissatisfaction in a repairs survey, staff may contact them to follow up. Staff training covers what is and what is not a complaint, so staff know when to signpost customers to the complaints procedure. A new programme of surveys is planned and will incorporate advice on how to make a complaint

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	There are multiple channels available for residents to complain, including a E-form, email address, contact number, by visiting the Civic Centre, and by letter. All this information is accessible through our website and the customer service centre. Ref: www.runnymede.gov.uk/say/complaints/4
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	The Council's complaints policy is available on our website with a clear indication of the stages involved and the expected timeframes. Ref: www.runnymede.gov.uk/say/complaints/4
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Our dedicated corporate Complaints webpage includes information on how to raise a complaint. Customers can find the complaints page on the homepage of the Council's website or by searching 'complaint' using our search bar. We are also building a complaints page dedicated to Housing issues and this will include the Housing Complaints Policy
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Our Housing Complaints Policy states: <i>'In accordance with the Equality Act we will make changes in our approach as necessary to ensure our services are accessible to disabled people as well as everybody else. The reasonable adjustments required may be physical, but we will also adjust this policy and procedure, as well as staff training, to ensure that the objectives are delivered equally well for all our customers including people with, for example, learning disabilities and those who cannot read or write or speak English.'</i> Ref: Complaints Policy, page 4, 2.Policy details, section 3.

2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	We have promoted the Housing Ombudsman and accessing our complaints in regular correspondence and communications with our customers. For example: Tenants newsletter November 2020 (runnymede.gov.uk)
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We currently only promote when seen to be relevant. I.e., Tenants' newsletters, annual reports, and the written responses to complaints.</p> <p>However, we recognise that we can improve this by including increasing promotion of the Ombudsman service and our complaints process. We will include this in future revisions of the policy and procedure and associated staff training</p>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	<p>The Housing Ombudsman service is promoted at every stage of the complaints process for relevant complaints.</p> <p>Ref: Housing Complaints Procedure, Stage 1 response template letter, and Stage 2 response template letter.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	<p>When an issue is raised via social media the Housing Complaints Policy states that we will usually suggest this is formalised by the complaint process so it can be logged and dealt with in line with this policy. We cannot investigate a complaint where data protection could be compromised as a result of responding, without the explicit consent of the person the complaint concerns.</p> <p>Ref: Housing Complaints Policy, page 3, point 2.10</p>

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>All Housing staff are trained to identify complaints. Complaints are logged corporately and in Housing by the Policy and Performance Officer who has the authority to engage with the relevant service or team to ensure the complaint is dealt with in accordance with policy and procedure. The Housing Business Development Manager is responsible for reporting analysis of complaints handling to the management team and to Housing Committee.</p> <p>Ref: Housing Complaints Procedure, section title <i>Responsibilities</i></p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Service managers handle complaints with no conflicts of interest. They have relevant knowledge regarding the subject matter, therefore best at identifying when we have provided an unsatisfactory service.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	All staff are trained on the complaints procedure. However, primarily our complaint handlers are managers, all of which have the experience and are trained to meet all the requirements to the left.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>All correspondence is recorded from both the resident and the landlord.</p> <p>All complaints are logged within 5 days as stage 1.</p> <p>When we acknowledge a complaint, we often contact the customer to discuss their concerns.</p> <p>Ref: Housing Complaints Procedure, page 4, step 5.</p>

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	The acknowledgement indicates the reason for the complaint from the complainant's point of view to ensure that the definition of the complaint is shared between both parties. Ref: Housing Complaints Procedure, page 3
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Either the acknowledgement or the phone call will establish a shared definition of the complaint to ensure that it is answered impartially. Ref: Housing Complaints Procedure, page 3, point 1 Our Policy requires that complaints are considered by a "Senior Manager. We will consider how we can better evidence impartiality e.g. by researching what do other landlords do on this
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	All complaint handlers have access to the Complaints Procedure which states the following advice when investigating: <ol style="list-style-type: none"> 1. The investigation will seek to answer: <ul style="list-style-type: none"> • What information is relevant, reliable and important to the issue being complained about? • Who/where/when is the information from? • Is it supported by other information? • Are there any gaps? Is there enough information to make a decision that will stand up to scrutiny? • Was the Council at fault? If so, how has this disadvantaged the complainant? What were the consequences? • What does the Council need to do to put things right? • Do we or the tenant have a legal obligation? Ref: Housing Complaint Procedure, page 4-5, Step 10.

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>We tailor our communication on the needs of the resident. We offer face-to-face meetings, letter, or what deems appropriate to the resident.</p> <p>We will also usually respond using the same method used to contact us.</p> <p>Ref: Housing Complaints Procedure, page 3, point 3.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>When the complaints handler is conducting an internal investigation, they will give the staff member(s) the opportunity to set out their position and make any comments. Between stage 1 and stage 2, the resident is also given this opportunity.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>In the letter template that complaint handlers use to respond to complaints, it states the following:</p> <p><i>'If you are dissatisfied with my response, you should reply within 14 days explaining why you remain dissatisfied and what you are seeking as an outcome. Your complaint will then be reviewed by a senior manager.'</i></p> <p>Ref: Housing Complaints Procedure, page 6-7 Stage 1 letter templates.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	<p>A complaints procedure ensures the following steps are taken, before a complaint is refused:</p> <p><i>'During the course of a complaint's investigation or following its conclusion, officers may conclude that they are dealing with an unreasonable complainant if they meet one or more of the characteristics outlined above.'</i></p> <p><i>In such cases the matter will be referred to the relevant Corporate Head who will decide whether or not to classify the complainant as unreasonable.'</i></p> <p>Ref: Complaints – Runnymede Borough Council</p>

	procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All complaints, it's correspondence and reviews are recorded. Should a resident complete a survey and their response informs us of their dissatisfaction we will act on it, should it not conflict with one of our existing policies.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	The Unreasonable Complaints Behaviour policy and protocol ensures complaint handlers are equipped to manage such situations. Complaints – Runnymede Borough Council

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	If a complaint is not appropriate for the complaints process, we ensure that the customer receives a detailed explanation of the reason(s) why and ensure that they are not left without a response for a lengthy period of time. Alternative advice will also be provided, for example the Housing Ombudsman Service.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	All staff are responsible for taking appropriate steps to resolve issues for residents as early as possible. We encourage the complainant to speak with a member of staff to discuss the matter and resolve the issue without delay. This option is also given to the complainant in their acknowledgement letter, along with the complaint handlers' details should they decide to use this process instead. Example: Complaints – Runnymede Borough Council
	Landlords should give residents the opportunity to have	Yes	A complainant can approach their

4.5	a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.		representative for advice at any time, can help resolve the complaint or refer the complaint to the Housing Ombudsman. Cllrs, who can be representatives, have the responsibility of signposting and pursuing complaints on behalf of the product.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	If a complaint touches on our or the tenants legal obligations, we will answer the complaint due regard to the law and sensitivity to the case.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We do not unnecessarily identify staff or contractors who are unrelated or minimal involvement in the complaint. Where necessary to gain a shared understanding for the resolution we will use the names of staff or contractors for clarity.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	In our policy, we encourage that wherever possible dialogue with the customer is encouraged to challenge any area of dispute before the final decision is made. This also gives us the opportunity to update the customer. Ref: Housing Complaints Policy, page 6, point 7.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	We are currently working on implementing surveys where we ask residents for feedback on how we handle complaints. www.runnymede.gov.uk/housing/housing-complaints
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Service managers are responsible for creating a positive complaint handling culture among staff and residents. There is a clear understanding that analysing complaints allows us to learn and action improvements to policy and practice. Ref: Housing Complaints Policy, page 5, paragraph 2.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our complaints policy does cover our responsibilities under the Equality Act 2010. We will strengthen the provisions on reasonable adjustments in the next review of the Housing Complaints policy.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	A complaint would be responded to within 10 working days. The only exception is due to staff absence or the complexity of the complaint. Should either of these scenarios occur, the resident will be informed in a timely manner.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	The Complaints procedure explains the following: 'The acknowledgement should define the complaint from the complainant's point of view, include details of what the complainant thinks has gone wrong and how it impacted them. Also, if appropriate, the outcome sought.'

5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Complaints procedure explains the following: <i>'The acknowledgement should define the complaint from the complainant's point of view, include details of what the complainant thinks has gone wrong and how it impacted them. Also, if appropriate, the outcome sought.'</i>
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • 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 • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	Runnymede Borough Council's complaint procedure includes a template letter for responses to follow, which covers these points.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	In the procedure we state that 'If the complaint is not resolved to the complainant's satisfaction it will be progressed to the next stage, to ensure the customer can challenge the decision by correcting any errors or raising any additional concerns.' We provide the advice in our complaint's procedure that a good decision letter, in this instance a complaint not being progressed, should consist of their decision and how they reached it. It will follow with information on how they can challenge this decision. At the end of stage 2, we must advise the complainant of their right to refer the complaint to the relevant Ombudsman Service. In the Housing instance, it will be the Housing

			Ombudsman.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	On receipt of the complaint, we will seek clarification if the complaint is not clear. The acknowledgement should define the complaint from the complainant's point of view, include items of what the complainant thinks has gone wrong and how it impacted them. Also, if appropriate, the outcome of sought. This gives the complainant the opportunity to challenge any area of dispute prior to the decision.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Complaint handlers understand that a complaint cannot progress to stage 2 until stage 1 has been completed.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 1 is handled by a senior manager, whereas stage 2 will be handled by the head of service.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Our policy recognises that we will provide a full response in 10 working days. If the complaint required lengthier investigation, the complainant will be advised and updated.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two 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 <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Our stage 2 letter template for complaint handlers to use details the bullet points in the letter, including that stage 2 concludes our internal complaints process. We do not have a stage 3 of our complaints process, however our letter does explain that if the complainant is dissatisfied with our response, we provide information and contact details on the Local Government and Social Care Ombudsman or the Housing Ombudsman (depending of the nature of their complaint.)

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	The complaints process includes two stages. If the customer is not satisfied with our final stage 2 response, they are informed of the Housing Ombudsman and how to contact them.

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	
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Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	When informing the complainant that an extension will be required, they are given the opportunity to discuss this.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	No	The HO details are provided to the complainant early on in the process, however we will specifically include this provision in the next review of the procedure, and subsequent training, in case this situation ever arises.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Complaint Handlers understand that they must consider the history and background with a recurring complaint.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	If a customer raises additional issues prior the stage one response, it will be added to the complaint. We consider each complaint on a case-by-case basis, and depending on the issues raised will dictate whether a new complaint is logged.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Should the circumstance occur that a complaints handler cannot respond in 10 days, they will advise the complainant with a update on when they can respond by which it is then agreed with the complainant.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's Response	Yes	The HO details are provided to the complainant early on in the process, however we will specifically include this provision in the next review of the procedure, and subsequent training, in case this situation ever arises. .

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not offer a third stage.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not offer a third stage.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Our complaints procedure includes the following to ensure we take accountability of our mistakes: 'If there is something to apologise for, we will do so. There must be a clear and direct link between the injustice we are remedying, and the fault we have identified. Any remedy should be appropriate and proportionate to the harm suffered. LGO guidance is available at www.lgo.org.uk/information-centre/reports/guidance-notes/guidance-on-remedies
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We are currently in the process of consulting on our Compensation Policy to ensure our service faults are remedied proportionately. Addendum: Compensation Policy approved Sept 2022
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	No	As part of the work on the compensation policy detailed above, we are improving how we remedy our complaints.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	No	As part of the work on the compensation policy detailed above, we are improving how we remedy our complaints.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	<p>Investigations into all complaints should be proportionate and pragmatic. If we have not made a mistake but recognise there may be something to improve a process, etc, staff are encouraged to identify learning opportunities and act on them.</p> <p>Addendum: From Sept 2022 these are monitored via the Corrective Action Log</p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	<p>If we receive a complaint, for example a complaint that mentions repair issues, we consider an appropriate remedy, regardless of any other potential legal remedy.</p> <p>We will strengthen this provision in the next review of the procedure</p>

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Our annual report informs residents of service improvements which were influenced by complaints. If complaints are made through resident engagement, feedback is provided through newsletter, letters and on our website. Example: Housing consultations and surveys – Runcymede Borough Council

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	We log and monitor all formal complaints received and report these to the Standard and Audit Committee. In addition, we report regularly to Housing Committee and the Housing Management Team reviews the volume and outcome of complaints and complaints handling performance to drive service improvements.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	We provide regular performance information on complaints to Housing Committee. The management team have access to key performance information on complaint handling. As part of the complaints analysis, we look at the most common causes of complaints, which informs our priorities for policies and procedures. We publish information on Ombudsman findings when applicable.

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Learning from complaints informs our risk management, audit functions and contracting arrangements, aids governance and helps us to make improvements to policies, processes and training.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	In our letter template response to stage 2, we offer signposting which encourages the respondent to signpost the complaint to other services.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	In line with the Ombudsman's requirement, we have completed self-assessments when required.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Though our organisation has not experienced a significant restructure, should this occur, we will carry out a self-assessment to ensure we continue to follow the Ombudsman's requirements.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	The self-assessment is reported back to elected members and included in the committee papers. These papers are available online. Moving forward, we will publish it on our Housing web pages. Example: www.runnymede.gov.uk/housing/housing-complaints