

Appendix A: Self-assessment form

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

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	This is the definition of a complaint included in the council’s Complaints Procedure.	
1.3	<p>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.</p> <p>A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>The Complaints Procedure states:</p> <p>“9.1 Often customers simply want the issue they are raising to be resolved, rather than to pursue a complaint under the council’s formal procedure. The council will therefore often seek to resolve complaints by promptly delivering the service or correcting the error highlighted by the customer, without following the formal complaints procedure.</p> <p>9.2 Where this approach is not appropriate, and in all cases where the customer requests it, the complaint will proceed to Stage 1.”</p> <p>“3.2 We will accept complaints brought by third parties (such as a friend or relative of the person</p>	

			affected) where there is clear evidence that the customer has given their permission. A complaint can also be made through an independent advocacy service and details of those services will be provided to the customer where appropriate.”	
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	<p>Our Complaints Procedure currently includes the following:</p> <p>“2.3 A complaint does not fall within this Complaints Procedure if it...is a routine first-time request for a service.”</p> <p>“9.1 Often customers simply want the issue they are raising to be resolved, rather than to pursue a complaint under the council’s formal procedure. The council will therefore often seek to resolve complaints by promptly delivering the service or correcting the error highlighted by the customer, without following the formal complaints procedure.</p> <p>9.2 Where this approach is not appropriate, and in all cases where the customer requests it, the complaint will proceed to Stage 1.”</p>	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the	Yes	The Complaints Procedure states:	

	<p>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.</p>		<p>“9.2 Where this approach [of resolving a complaint as a service request] is not appropriate, and in all cases where the customer requests it, the complaint will proceed to Stage 1.”</p> <p>The auto-acknowledgement email sent from the council’s Complaints mailbox asks customers to indicate if they are emailing about an existing service request so it can be treated as formal complaint.</p> <p>An independent mock inspection of the HRA service that reported in May 2024 states:</p> <p><i>“2.5.1 WC’s complaints process is clear and gives guidance on how to make a complaint, and timescales - which align to the Housing Ombudsman’s handling code. The Housing Board receives highlights of complaints but believes there is an issue with complaints being dealt with as a service request. We heard of examples where tenants think they have made a complaint, which had been treated as a service request and not formalised. Some tenants are confused by this as they think they have made a formal complaint. This highlights poor communication between WC and the</i></p>	
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			<p><i>complainant.</i></p> <p><i>Recommendation (TIA 2.5.1): WC to ensure that complaint classifications meet the Ombudsman's guidance on differentiating complaints from service requests, and this is communicated to tenants at the appropriate point in time."</i></p> <p>Proposals to Full Council in October 2024 to amend the Complaints Procedure will include clarification of complaint classifications, with reference to 'informal resolution' being removed.</p>	
1.6	<p>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.</p>	In progress	<p>Action is now being taken to ensure all resident surveys include details of how respondents can make formal complaints.</p>	

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	Where a complaint is not accepted, a reason is always given and always refers to the relevant exclusion as set out in the Complaints Procedure.	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>The Complaints Procedure states:</p> <p>“2.3 A complaint does not fall within this Complaints Procedure if it:</p> <p>2.3.1 is a routine first-time request for a service.</p> <p>2.3.2 relates to legal proceedings involving the complainant, including proceedings brought by or against the Council.</p> <p>2.3.3 concerns a disagreement with a decision where a statutory right of appeal exists, for example in relation to council tax, planning or licensing.</p> <p>2.3.4 is an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our</p>	

			<p>final decision.</p> <p>2.3.5 is a matter relating to a contract between the Council and an organisation providing services to it, or vice-versa.</p> <p>2.3.6 relates to personnel matters, including appointments, dismissals, pay, pensions and discipline.</p> <p>2.3.7 it is a challenge to a policy/decision made by the Council.</p> <p>2.3.8 concerns school management issues (these are managed by individual schools).</p> <p>2.3.9 falls within the scope of another statutory complaints process, such as those dealing with adult social care, some aspects of children's services, elected members, or the Wiltshire Police and Crime Commissioner (see below).</p>	
2.3	<p>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.</p>	Yes	<p>The Complaints Procedure states:</p> <p>"7. Time limit for making complaints</p> <p>7.1 In line with guidelines set by the Local Government and Social Care Ombudsman and the Housing Ombudsman, this procedure sets a time limit of 12 months from when</p>	

			the customer first knew, or ought to have known, of the problem, within which time they may ask us to consider the complaint, unless there are special circumstances for considering complaints beyond this time.	
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	See 2.1 above.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>The Complaints Procedure states:</p> <p>“13.1 Everyone has the right to access to our complaints procedure. Customers who do not have English as a first language may need help with interpretation and translation services, and other customers may have specific needs that we will seek to address to ensure easy access to the complaints procedure.</p> <p>13.2 We will always take into account our commitment and responsibilities to equality. This includes making reasonable adjustments to our service to help the customer where appropriate.</p> <p>13.3 Several support and advocacy groups are available to support customers in pursuing a complaint and customers will be signposted to these as appropriate.”</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	In progress	Communications to all staff will be circulated in July highlighting this responsibility and how to refer complainants to the relevant team and webpage.	

	person within the landlord.			
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>The council produces and publishes a comprehensive Annual Complaints Report providing data on the number of complaints received. This is considered by the Standards Committee and Overview and Scrutiny Management Committee.</p> <p>The Complaints Procedure states:</p> <p>“14.1 This Complaints Procedure is provided to all complainants and is available on the Council’s complaints webpage (here).”</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>The Complaints Procedure sets out the two-stage process in an easy-to-read flowchart. It is available in multiple languages. It states:</p> <p>“13.1 Everyone has the right to access to our complaints procedure. Customers who do not have English as a first language may need help with interpretation and translation services, and other customers may have specific needs that we will seek to address to ensure easy access to the complaints procedure.”</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the	Yes	<p>The Complaints Procedure states:</p> <p>14. Publicising the Complaints Procedure</p>	

	Ombudsman and this Code.		14.1 This Complaints Procedure is provided to all complainants and is available on the Council's complaints webpage (here).	
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	The Complaints Procedure states: "3.2 We will accept complaints brought by third parties (such as a friend or relative of the person affected) where there is clear evidence that the customer has given their permission. A complaint can also be made through an independent advocacy service and details of those services will be provided to the customer where appropriate."	
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	All complainants are informed of their right to access the Ombudsman service and provided with the relevant contact details. The Complaints Procedure states: "15. Ombudsmen details 15.1 Local Government and Social Care Ombudsman (LGSCO): www.lgo.org.uk , t. 0300 061 0614 15.2 LGSCO Complaint Handling	

			Code (here)	
			15.3 Housing Ombudsman: www.housing-ombudsman.org.uk , t. 0300 111 3000	
			15.4 Housing Ombudsman Complaint Handling Code (here)”	

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	<p>The council has a dedicated Complaints Team which sits within in its Legal, Governance and Customer Services directorate led by the Monitoring Officer. The team coordinates the council’s response to all formal complaints and liaison with the two Ombudsmen.</p> <p>Housing Revenue Account officers allocate and monitor complaints and assign keywords for reporting purposes. Data is presented to team meetings, the Housing Board, and our Annual Report to Tenants and Leaseholders. Corporate data is presented through the corporate system too.</p>	
4.2	The complaints officer must have access to	Yes		

	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.			
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	The Complaints and HRA teams have collaborated on the development of complaint handling guidance and training for those staff involved in the process.	

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	All eligible complaints about the council as a landlord are handled under the Complaints Procedure.	
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	The Complaints Procedure allows for matters to be resolved as 'service requests where appropriate. However, the formal Complaints Procedure comprise only two 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	Yes	See above An independent mock inspection of	

	and delay access to the Ombudsman.		<p>the HRA service that reported in May 2024 states:</p> <p><i>“1.6.1 WC’s stage 1 process flowchart complies with the Housing Ombudsman’s Code of Conduct and takes into account extensions and feedback. The Draft HRA Complaints Procedure is taking into account the recommendations within the Housing Ombudsman’s handling code in terms of timescales.</i></p> <p>Recommendation (TIA 1.6.1): <i>WC to ensure that the HRA complaints procedure is aligned to the Complaints Handling Code 2024. Ensure all staff are trained on the amendments to the code. While stage 3 complaints are 'accepted', they are not recommended by the Housing Ombudsman, and WC should consider removing this from the housing complaints process.”</i></p> <p>The Complaints Procedure is already a two-stage process. However, proposals to Full Council in October 2024 to amend the Procedure will clarify this, with service requests defined separately from formal complaints.</p>	
5.4	Where a landlord’s complaint response is handled by a third party (e.g. a contractor or	Yes	Housing Revenue Account officers liaise with contractors, where	

	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.		appropriate, and provide responses to the resident, with copies provided to the Complaints team.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Housing Revenue Account officers liaise with contractors, where appropriate, and provide responses to the resident, with copies provided to the Complaints team.	
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	All Stage 1 and 2 responses include a clear statement of the council’s understanding of the complaint.	
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	All Stage 1 and 2 responses include a clear statement of the council’s understanding of the complaint.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of 	Yes		

	<p>interest; and</p> <p>d. consider all relevant information and evidence carefully.</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		
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>The Complaints Procedure states:</p> <p>“13.2 We will always take into account our commitment and responsibilities to equality. This includes making reasonable adjustments to our service to help the customer where appropriate.”</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		
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, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.</p>	Yes	<p>The Complaints team maintains a central, corporate log of all complaints being handled under the Complaints Procedure.</p> <p>The Housing Revenue Account team registers complaints on QL (its internal computer system) which includes dates and the substance of</p>	

			<p>the complaint. It also assigns keywords for reporting purposes. Outcomes are logged as Upheld / Upheld Substantially / Not Upheld. Correspondence and documents are stored either on QL or Documotive (a document repository).</p>	
5.13	<p>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.</p>	Yes	<p>The Complaints Procedure states:</p> <p>8.1 At all stages of the complaints handling process the emphasis will be on resolving the complaint at the earliest opportunity.</p> <p>An independent mock inspection of the HRA service that reported in May 2024 states:</p> <p><i>“2.3.3 We found limited evidence showing how WC communicates its progress on issues reported by tenants. WC’s complaints flowchart outlines when and how a tenant making a complaint will be contacted [note that the Ombudsman produces a template version of this]. Other progress updates are provided passively through newsletters or, for planned works, by direct mail / email.</i></p> <p>Recommendation (TIA 2.3.3): <i>review the communication process following a service request from a tenant (repairs, lettings, ASB,</i></p>	

		<p><i>complaint etc.). Explain how and when WC will communicate back to the tenant. Ensure that tenants' communication preferences are understood and adhered to. No one should be excluded from this due to communication preferences."</i></p> <p>In line with procedural guidance for HRA staff, on receipt of a service request officers must ensure contact is made within three working days to gain a full understanding of the issue the tenant is facing and the resolution they require/need Their preferred method of contact will be established at first point of contact. If contact cannot be made by the preferred method and several attempts have been made to contact using the preferred method, then all methods of contact will be explored to ensure tenant is kept updated and advised on the progress of their service request. Each case will receive an allocated officer responsible for updating and liaising with the tenant throughout. Service requests will only be closed if the tenant has been informed and is satisfied that their service request has been met and dealt with accordingly. In line with procedure receipt of a service requests must be responded to within 3 working days</p>	
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			however there are exceptions to this if the case requires urgent attention for example ASB, Domestic Abuse or in situations where the service request highlights immediate action being needed then this can be in as little as 4 hours.	
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	<p>The council has the following policies in place:</p> <ul style="list-style-type: none"> • Unwanted Behaviour from Members of the Public Policy and Procedure. • Unreasonable (vexatious) Communications Policy and Procedure. 	
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 Policies above reflect the council's responsibilities under the Equality Act 2010.	

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	The council's responses to complaints at all stages seek to do this. The allocated officer would also address the matter as appropriate.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Under the current Complaints Procedure, the council acknowledge all complaints within 2 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	This is the timescale required under the Complaints Procedure.	
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	This is the extension permitted under the Complaints Procedure.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact	Yes		

	details of the Ombudsman.			
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		
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	To further support comprehensive complaint responses, corporate guidance on good complaint handling is being developed.	
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		
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; 	Yes		

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes		
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 council acknowledge requests for escalation within 2 days .	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes		
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	All Stage 2 investigations are undertaken by members of the Complaint team, rather than by members of the relevant service.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	This is the timescale required under the Complaints Procedure.	

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	The current Complaints Procedure only permits an extension of 10 working days.	
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		
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		
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		
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes		

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes		

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes		
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		
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>The council produces a comprehensive Annual Complaints Report presenting the information required. This is presented to the Corporate Leadership Team, Standards Committee and Overview and Scrutiny Management Committee.</p> <p>An independent mock inspection of the HRA service that reported in May 2024 recommended:</p> <p><i>“2.5.2 WC’s Housing Board Service Changes from Complaints document clearly outlines four changes that have been made to service delivery following complaints. We felt that more should be more documented here, even if no changes were made. The Complaint report demonstrates that the volume of complaints are tracked on a monthly basis and broken down into the key service areas. This report did highlight areas of missing information (key dates etc.) which will need to be rectified.</i></p> <p>Recommendation (TIA 2.5.2 A):</p>	

			<p><i>WC to produce tenant-facing documentation recording changes made as a result of complaints. We saw internal communication on this, but not external. We also recommend documenting feedback from complaints where no changes have been made – with an explanation.”</i></p> <p>HRA Officers hold regular complaint review meetings to ensure implementation of lesson learnt and best practice. Proposal to expand this with a Communications Review Group (CRG). The CRG will be formed of an officer group made up with staff from different teams across the service and will involve the Comms and Tech Group. The Comms and Tech group is the tenant group informing and influencing communications across the HRA from a tenant perspective. Consideration will be given to how to best document and feedback from complaints where no changes have been made.</p>	
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report</p>	Yes	<p>The Annual Complaints reports are presented to the Standards Committee and Overview and Scrutiny Management along with the minutes of the committees’ discussion.</p>	

	must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	-		
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		

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>Complaints data is monitored and, when a trend in complaints is identified, the Complaints team liaises with the relevant service to identify the cause and any actions needed.</p> <p>An independent mock inspection of the HRA service that reported in May 2024 stated:</p> <p><i>“2.5.2 WC’s Housing Board Service Changes from Complaints document clearly outlines four changes that have been made to service delivery following complaints. We felt that more should be more documented here, even if no changes were made. The Complaint report demonstrates that the volume of complaints are tracked on a monthly basis and broken down into the key service areas. This report did highlight areas of missing information (key dates etc.) which will need to be rectified.</i></p> <p>Recommendation (TIA 2.5.2 B): WC to ensure that any key dates with regards to complaints are</p>	

			<i>captured and reported accurately.”</i>	
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	See above	
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 council’s Annual Complaints Report 2023-24 will be published shortly and includes a breakdown of complaints by service, the issues leading to complaints and the actions taken to address them. Social housing complaints data is used by the Challenge and Change Group (resident scrutiny) group and provided in the Annual Report to Tenants and Leaseholders. Data is also reported to internal team meetings, along with keywords.	
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	The Monitoring Officer and Director for Legal, Governance and Customer Services has officer responsibility for complaint handling generally. The Director for Assets and the Head of SAM&FM and Housing Management Service, also discuss complaints data in team meetings and at the Housing Board.	

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	<p>The Standards Committee and Cabinet Member with responsibility for Governance have general responsibility for the complaints handling framework at the council.</p> <p>The Housing Board is the MRC in regard to housing complaints.</p>	
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	<p>Wiltshire Council's Housing Board receive an annual Complaints and Compliments Report (ordinarily at its May meeting).</p> <p>When a Housing Ombudsman Service report is received, it is ordinarily presented to the Board; this has occurred on one occasion in the past and officers will be reminded that any Housing Ombudsman Service reports received must be listed on the next available Housing Board agenda.</p> <p>The annual performance report produced by the Ombudsman will be listed on the Housing Board agenda (or that of a sub-committee).</p> <p>The annual self-assessment report produced against the Complaint Handling code is listed on the Housing Board agenda (or that of a sub-committee).</p>	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>The Housing Board is provided with complaints data at every meeting as part of the HRA Scorecard. Reviews of issues and trends are addressed verbally and via the annual report to the Housing Board, which covers performance and improvements.</p> <p>For Ombudsman's investigations, please see the point above.</p>	
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 co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>The Complaints Procedure states:</p> <p>"We aim to deliver a complaints function that:</p> <ul style="list-style-type: none"> 1.3.1 Is simple for everyone to use and understand 1.3.2 Is led and supported by the very top of the organisation 1.3.3 Ensures excellent service standards are delivered 1.3.4 Fulfils the needs of our customers 1.3.5 Enables us to learn from customer feedback in order to improve 1.3.6 Complies with the relevant legislation and council policy 1.3.7 Focuses on fair, proportionate resolution at the earliest stage 	

			1.3.8 Works in an open-minded and impartial way”	
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