

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|--|------------------|--|--------------------------------------|
| 1.2            | A complaint must be defined as:<br><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>  | Yes              | Page 2 of the complaints policy states a complaint is defined as "A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the council, its own staff, or those acting on its behalf, affecting an individual or a group of individuals."<br><br>The definition is also defined on the website <a href="#">Council Housing Service Complaints</a> . | As set out in the 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              | Page 2 of the complaints policy states "A customer does not have to use the word complaint for an expression of dissatisfaction to be treated as a complaint and whenever a customer expresses dissatisfaction with Waverley's services they will be given the option to make a complaint."<br><br>Page 2 also states "Third parties or representatives can also   | As set out in the complaints policy. |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                |  |                  | include an advocate such as a friend or representative of an external organisation.”   |   |
| 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              | Page 2 of the complaints policy states “Service requests i.e. a request from a customer to the Council requiring action to be taken to put something right, are not complaints.” Examples of complaints are listed on page 2.  | As set out in the complaints policy.  |
| 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              | Page 3 of the complaints policy states “However, a complaint will be raised if the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. A complaint will not prevent or have any impact on the actions taken to put right any immediate issues i.e. the service request.” | As set out in the complaints policy.  |
| 1.6            | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though   | Yes              | ‘Hot alerts’ identified through surveys are acted on and the tenants are contacted and   | Tenants who express high levels of dissatisfaction in the transactional repairs |

| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b>                   | <b>Commentary / explanation</b>   |
|-----------------------|---|-------------------------|-----------------------------------|---|
|                       | 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. |                         | advised of how they can complain. | survey and in the Tenant Satisfaction Measures survey trigger a 'hot alert'. They are contacted by an officer who will try to resolve the issue and offer them the opportunity to complain. |

## Section 2: Exclusions

| <b>Code provision</b> | <b>Code requirement</b>  | <b>Comply: Yes / No</b> | <b>Evidence</b>  | <b>Commentary / explanation</b>      |
|-----------------------|--|-------------------------|--|--------------------------------------|
| 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                     | Page 4 of the complaints policy states "We will take an objective view of the issues being complained about, to get a clearer understanding of what has caused the complaint."   | As set out in the complaints policy. |
| 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:        | Yes                     | Page 2 of the complaints policy outlines why a complaint may not be considered and states "We will not usually consider a complaint about a matter that occurred over 12 months ago, where legal procedures have started or where the issues being | As set out in the complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation                               |
|----------------|---|------------------|--|--|
|                | <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul> |                  | complained about have already been considered under the complaints procedure.”   |  |
| 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              | <p>Page 2 of the complaints policy states “We will not usually consider a complaint about a matter that occurred over 12 months ago, where legal procedures have started or where the issues being complained about have already been considered under the complaints procedure. However, where there are good reasons to do so, we will consider whether to apply discretion to accept complaints made outside this time limit.”</p> <p>Page 5 of the complaints policy states “We will be sensitive to</p> | All complaints are considered on a case-by-case basis. |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                |  |                  | customers' individual needs, empathising with the customer's situation, and will consider whether to accept complaints where more than 12 months have passed since the customer became aware of the issues that are causing them concern."                           |   |
| 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              | Page 3 of the complaints policy states "If it is decided not to accept a complaint, the customer will be provided with an explanation of the reasons for that decision and will be given information on how to raise their concerns with the appropriate Ombudsman." | Complaints are refused very rarely but residents are always given a full explanation if this is the case. |
| 2.5            | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes              | Page 4 of the complaints policy states 'We will be sensitive to customers' individual needs, empathising with the customer's situation.'   | As set out in the complaints policy.  |

## 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>Page 2 of the complaints policy states "Complaints submitted via a third party or representative, for example by a councillor or MP, will be dealt with in line with this policy, provided that the complainant has given their permission for the third party or representative to act on their behalf."</p> <p>Page 4 of the complaints policy states "We will be flexible in how complaints are received – by phone, letter, email, via the internet or in person. We will treat all customers fairly and impartially. We will be sensitive to customers' individual needs, empathising with the customer's situation. We will make reasonable adjustments for customers where appropriate under the Equality Act 2010, keeping a record of those</p> | As set out in the complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation                                    |
|----------------|---|------------------|--|---|
|                |   |                  | adjustments which will be kept under active review.”   |   |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord. | Yes              | <p>Page 4 of the complaints policy states “We will be flexible in how complaints are received – by phone, letter, email, via the internet or in person.”</p> <p>Training given in March 2024 to the Housing team to ensure all are aware of the complaints process</p> |   |
| 3.3            | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.        | Yes              | Training which has been delivered by Corporate Complaints Officer stresses that complaints should be seen as an opportunity to learn from the experiences of tenants.  | See document “Complaints Procedure Presentation March 2024” |



| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|--|------------------|---|---|
| 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 <a href="#">complaints policy</a> is available on the website, in summary on webpages and as pdf for the full document.</p> <p>The updated version of the policy will be added to the website following its formal adoption.</p> <p>Translations into other languages, easy reads and large print versions are available on request.</p>                           | <p>As set out on the website.</p> <p>Information on the website meets accessibility standards (WCAG 2.2 AA).</p> <p>The updated policy will be reviewed to ensure it meets the latest requirements for accessibility.</p> |
| 3.5            | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.   | Yes              | <p>Page 3 of the policy states “The Policy takes into account the requirements of the Housing Ombudsman’s complaint handling code.”</p> <p>Page 4 of the policy states “We will ensure that details of our complaints procedure are published on the Council’s website and are available in printed form for those customers who do not have access to the internet.”</p> |   |
| 3.6            | Landlords must give residents the  | Yes              | Page 2 of the complaints policy   | As set out in the complaints  |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
|                | opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.                       |                  | states " Complaints submitted via a third party or representative, for example by a councillor or MP, will be dealt with in line with this policy, provided that the complainant has given their permission for the third party or representative to act on their behalf. Third parties or representatives can also include an advocate such as a relative, friend or representative of an external organisation."   | policy.  |
| 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              | In level 2 complaint responses residents are advised "This response means that you have come to the end of the Council's complaints procedure, and if you continue to feel that the Council has not dealt properly with your complaint you can now raise your concerns with the Housing Ombudsman Service. This is a free service, and you can obtain further details from the Ombudsman's website at <a href="http://www.housing-ombudsman.org.uk">www.housing-ombudsman.org.uk</a> " | The next edition of Homes and People Magazine has a section dedicated to complaints. It includes information about the Ombudsman and a link to find out more about it. |

| Code provision | Code requirement | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|------------------|------------------|--|--------------------------|
|                |                  |                  | <p>Page 6 of the complaints policy states “Level 2 complaints will be acknowledged in 5 working days and responded to within 20 working days with details of how to escalate the matter to either the Local Government and Social Care Ombudsman or the Housing Ombudsman Service as appropriate if the complainant is not satisfied with the response.”</p> <p>The website states “If you are a tenant or leaseholder of Waverley and your complaint concerns a housing matter: You can raise your concerns directly with the Housing Ombudsman. More details can be found on the Housing Ombudsman’s website.”</p> |                          |

## 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>Page 7 of the complaints policy states "The Corporate Complaints Officer is responsible for:</p> <ul style="list-style-type: none"> <li>• Managing the Council's complaints handling database and working with Service Complaints Administrators to ensure efficient and timely handling of complaints.</li> <li>• Keeping under close review all complaints received at Level 2 and providing direct assistance to Assistant Directors in the investigation of Level 2 complaints.</li> <li>• Providing guidance and training to staff on good complaints handling, including response templates, and on the requirements of the Housing Ombudsman's complaint handling code and the proposed Local Government and Social Care Ombudsman's complaint handling code.</li> <li>• Responding to requests for</li> </ul> | <p>The Assistant Director of Communications and Customer Services has overall responsibility for complaint handling. They are supported in this role by the Customer Services team. There is a dedicated Complaints Officer in the Housing Service. There is also a Corporate Complaints Officer who is dedicated to Level 2 complaints. The Corporate Complaints officer also liaises with the Housing Ombudsman Service and Local Government and Social Care Ombudsman.</p> |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|---|------------------|---|--|
|                |   |                  | <p>information received from the Local Government and Social Care Ombudsman and the Housing Ombudsman Service in respect of complaints they have received about Waverley's services.</p> <ul style="list-style-type: none"> <li>• Acting as the Council's Link Officer with the two Ombudsman Services.</li> <li>• Providing statistical information on performance in complaints handling to the Chief Executive, Directors, Assistant Directors, senior managers and Councillors." </li></ul> |  |
| 4.2            | <p>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.</p> | Yes              | <p>Officers have access to staff of all levels. This is stated in the job description of the role:</p> <ul style="list-style-type: none"> <li>• To work proactively with the Senior Management, Head of Housing, Managers and other colleagues within the Housing Service, and with contractors, legal representatives to ensure that prompt action is taken to address any lessons learned from complaints to improve service delivery.</li> <li>• To develop close working</li> </ul>         | <p>As set out in the Service Improvement Officer for Complaints Officer's job description.</p> |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
|                |   |                  | <p>relationships with other Housing colleagues, contractors, legal representatives and the Customer Services Team.</p> <ul style="list-style-type: none"> <li>• To promote a positive complaint handling culture across the Housing Service, raising awareness of all relevant policies and providing refresher complaints handling training to teams as and when appropriate.</li> </ul> |                          |
| 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              | <p>The new dedicated Service Improvement Officer for Complaints has been resourced to ensure complaints are handled effectively.</p> <p>Page three of the policy sets out the aims including “Learning from past events including mistakes, taking prompt action to put matters right.”</p>   |                          |

## 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              | Page 4 of the complaints policy state “We will treat all customers fairly and impartially.”   | There is a single complaints policy which applies to all complaints received by the council. |
| 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              | Page 6 of the complaints policy states “Waverley’s complaints procedure has two levels: Level 1 - Complaints will initially be investigated by the appropriate Team Leader or Manager in the Service that is being complained about. Level 1 complaints will be acknowledged within 3 working days and responded to within 10 working days with details of how to escalate the matter to Level 2 if the complainant is not satisfied with the response. Level 2 - If the customer is unhappy with the response to their Level 1 complaint they can ask the appropriate Assistant Director to investigate their concerns under Level 2. Level 2 complaints will be acknowledged in 3 working | As set out in the complaints policy.   |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                |  |                  | <p>days and responded to within 20 working days with details of how to escalate the matter to either the Local Government and Social Care Ombudsman or the Housing Ombudsman Service as appropriate if the complainant is not satisfied with the response.”</p> <p>Page 4 of the complaints policy states “ We will encourage staff to try to resolve complaints at the earliest opportunity, thereby benefiting the customer and organisation.”</p> <p>There are no extra named stages.</p> |   |
| 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              | There is a two stage process as outlined in the complaints policy.   | The complaints policy covers all statutory, corporate and Ombudsman complaints.   |
| 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 | Yes              |  | No aspect of the complaints policy is handled by a third party. Residents are not expected to utilise any complaints procedure with other organisations such as |



| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                | expected to go through two complaints processes.   |                  |  | contractors and all complaints are directed to Waverley for consideration under the two-stage process which is outlined in the policy.  |
| 5.5            | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes              |  | No aspect of the complaints policy are handled by a third party.  |
| 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              | Page 6 of the complaints policy states that for both level 1 and 2 “The acknowledgement will also include our understanding of the complaint, the outcomes the customer is seeking, the aspects for which Waverley is responsible and those for which it is not, and a request for clarification from the customer if any part of the complaint is unclear.” |   |
| 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              | Page 6 of the complaints policy states that for both level 1 and 2 “The acknowledgement will also include our understanding of the complaint, the outcomes the customer is seeking, the aspects for which Waverley is responsible and those for which it is not, and a request for clarification from the customer if any part of the                        | Where we are not responsible for any aspect of a complaint, we will clearly clarify this in the acknowledgement. If we can, we will signpost any elements we are not responsible for to the correct organisation. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|---|------------------|--|--|
|                |   |                  | complaint is unclear.”   |  |
| 5.8            | <p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ol> | Yes              | Page 4 of the complaints policy states “We will take an objective view of the issues being complained about, to get a clearer understanding of what has caused the complaint.” | <p>All complaint handlers must adhere to the Code.</p> <p>The Complaints Officer will be required to:</p> <ul style="list-style-type: none"> <li>• Communicate directly with members of the public who have made complaints while demonstrating excellent interpersonal skills. At all times you will need a sympathetic yet objective approach</li> <li>• Provide advice and support to colleagues in all service areas regarding our complaint’s procedures.</li> <li>• Record, monitor and produce monthly and quarterly performance reports on the progress of complaints and compliance with statutory and corporate procedures as required.</li> <li>• Ensure complainants and colleagues follow the appropriate complaints procedure within relevant timescales whilst promoting</li> </ul> |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                |  |                  |  | <p>a positive culture of learning from complaints.</p> <ul style="list-style-type: none"> <li>• Work well under pressure, prioritise a varied workload, meet strict deadlines and operate effectively as part of a team.</li> </ul> |
| 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              | Page 5 of the complaints policy states in a standalone paragraph, “Where it is necessary to extend the timescale for response to a complaint at either Level 1 or Level 2 due to the complexity of the complaint, we will inform the complainant of the expected timescale for response making sure that any extension is no more than 10 working days, and explaining the reasons for this extension. We will also provide them with contact details of the appropriate Ombudsman. If a full response cannot be issued within the initial timeframe and the extended timescales permitted in the Ombudsman’s complaint handling code, we will contact the customer to agree suitable intervals for being updated on the progress of the complaint.” | As set out in the complaints policy.  |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
| 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              | Page 4 of the complaints policy states: "We will make reasonable adjustments for customers where appropriate under the Equality Act 2010, keeping a record of those adjustments which will be kept under active review." | The Housing management system records protected characteristics of residents.                            |
| 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              | Page 6 of the complaints policy states "If the customer is unhappy with the response to their Level 1 complaint, they can ask the appropriate Assistant Director to investigate their concerns under Level 2."           | The content of section 2 of the complaints policy aligns with section 2 of the Housing Ombudsman's code. |
| 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              | Full records of every complaint and outcomes are stored on the complaints database.  |  |
| 5.13           | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints  | Yes              | Page 4 of the complaints policy states "we will encourage staff to try to resolve complaints at the  | As set out in the complaints policy.   |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|---|------------------|--|---|
|                | process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.   |                  | earliest opportunity, thereby benefiting the customer and organisation.”   |   |
| 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 a Single Point of Contact (SPoC) procedure and an ASB policy. Page 9 of the complaints policy states “Dealing with unreasonably persistent and unreasonable complainants An unreasonably persistent complainant is a person who:</p> <ul style="list-style-type: none"> <li>• Repeatedly makes an unreasonable complaint or expects an unrealistic outcome;</li> <li>or</li> <li>• Makes a reasonable complaint in an unreasonable way (for example by making excessive demands on time and resources of staff, changing the basis of the complaint as the investigation proceeds, refusing to accept that certain issues are not within the scope of our complaints procedure or refusing to accept the Council’s response). This issue is addressed in more detail in the Council’s policy on dealing with unreasonably persistent and</li> </ul> | <p><a href="#">Complaints policy</a></p> <p>Add policy below if relevant</p> <p>As set out in the <a href="#">Policy for dealing with unreasonably persistent complainants</a>.</p> |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
|                |  |                  | unreasonable complainants.”  |  |
| 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 Single Point of Contact (SPOC) procedure is outlined in the policy for dealing with unreasonable persistent complaints. The purpose of the policy as stated on page 3 is to “Help the Council to deal with unreasonable and unreasonably persistent complainants in a way that is open, fair and proportionate.” | As set out in the <a href="#">Policy for dealing with unreasonably persistent complainants</a> . |

## 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              | <p>Page 4 of the complaints policy states “we will encourage staff to try to resolve complaints at the earliest opportunity, thereby benefiting the customer and organisation.”</p> <p>Page 8 of the complaints policy states “A complaint response should be provided to the complainant when the answer to the complaint is known and not when the outstanding actions required to address the issue are completed.”</p> | As set out in the complaints policy.       |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>  | Yes              | Page 6 of the complaints policy states “Level 1 complaints will be acknowledged within 5 working days and responded to within 10 working days of the complaint being acknowledged with details of how to escalate the matter to Level 2 if the complainant is not satisfied with the response. The acknowledgement will also   | <a href="#">As set out on the website.</a> |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation                   |
|----------------|--|------------------|---|--|
|                |  |                  | include our understanding of the complaint, the outcomes the customer is seeking, the aspects for which Waverley is responsible and those for which it is not, and a request for clarification from the customer if any part of the complaint is unclear.”  |  |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                 | Yes              | Page 6 of the complaints policy states “Level 1 complaints will be acknowledged within 5 working days and responded to within 10 working days of the complaint being acknowledged with details of how to escalate the matter to Level 2 if the complainant is not satisfied with the response. The acknowledgement will also include our understanding of the complaint, the outcomes the customer is seeking, the aspects for which Waverley is responsible and those for which it is not, and a request for clarification from the customer if any part of the complaint is unclear.” | <a href="#">As set out on the website.</a> |
| 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 | Yes              | Page 5 of the complaints policy states “Where it is necessary to extend the timescale for response to a complaint at either   | As set out in the complaints policy.       |



| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|---|------------------|--|--------------------------------------|
|                | 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.  |                  | Level 1 or Level 2 due to the complexity of the complaint, we will inform the complainant of the expected timescale for response making sure that any extension is no more than 10 working days, and explaining the reasons for this extension. We will also provide them with contact details of the appropriate Ombudsman.”  |                                      |
| 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              | As above.  | As set out in the complaints policy. |
| 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              | <p>Page 5 of the complaints policy states “we will encourage staff to try to resolve complaints at the earliest opportunity, thereby benefiting the customer and organisation.”</p> <p>Page 9 of the complaints policy states “A complaint response should be provided to the complainant when the answer to the complaint is known and not when the outstanding actions required to address the issue are completed.”</p> | As set out in the complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                |   |                  | Page 9 of the complaints policy states "All outstanding actions will be tracked and actioned promptly with appropriate updates provided to the customer."   |                                      |
| 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              | Page 4 of the complaints policy states "We will make sure that all responses to a complaint include the 'complaint definition' i.e. our understanding of the issues being raised by the complainant. We will take an objective view of the issues being complained about, to get a clearer understanding of what has caused the complaint."   | As set out in the complaints policy. |
| 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              | Page 6 of the complaints policy states "Any additional complaints that are raised by the customer during the investigation will be included in the Level 1 response if this has not been issued. However, if those new issues are raised after the Level 1 has been issued, are unrelated or would unreasonably delay the Level 1 response, these will be logged as a new complaint." |                                      |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
| 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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes              | Response template used for all complaints to ensure this information is provided.<br><br>Training which will be provided to all housing staff will include this. |                          |

**Stage 2**

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|------------------|------------------|----------|--------------------------|
|----------------|------------------|------------------|----------|--------------------------|

| 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              | Page 6 of the complaints policy states "Level 2 If the customer is unhappy with the response to their Level 1 complaint they can ask the appropriate Assistant Director to investigate their concerns under Level 2. Level 2 complaints will be acknowledged in 3 working days and responded to within 20 working days with details of how to escalate the matter to either the Local Government and Social Care Ombudsman or the Housing Ombudsman Service as appropriate if the complainant is not satisfied with the response." | As set out in the complaints policy. |
| 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              | Page 7 of the complaints policy states "Level 2 complaints will be acknowledged in 3 working days and responded to within 20 working days from the complaint being acknowledged, with details of how to escalate the matter to either the Local Government and Social Care Ombudsman or the Housing Ombudsman Service as appropriate if the complainant is not satisfied with the response"  | As set out in the complaints policy. |
| 6.12           | Residents must not be required to  | Yes              | Page 6 of the complaints policy  |                                      |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                | 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. |                  | states "If the customer is unhappy with the response to their Level 1 complaint they can ask the appropriate Assistant Director to investigate their concerns under Level 2. They do not need to provide reasons for requesting that their complaint is escalated."   |                                      |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes              | Housing Service Manager and Housing Service Improvement Officer for Complaints investigate Level 1. Corporate Complaints Officer and Head of Housing investigate Level 2  |                                      |
| 6.14           | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes              | Page 6 of the complaints policy states "Level 2 complaints will be acknowledged in 5 working days and responded to within 20 working days from the complaint being acknowledged, with details of how to escalate the matter to either the Local Government and Social Care Ombudsman or the Housing Ombudsman Service as appropriate if the complainant is not satisfied with the response" |                                      |
| 6.15           | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the   | Yes              | Page 6 of the complaints policy states "If it is not possible to respond to the complaint within  | As set out in the complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|---|------------------|--|--------------------------------------|
|                | 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.   |                  | 20 working days of the complaint being acknowledged, we will extend the timescale for response by up to a further 20 working days and inform the resident.”  |                                      |
| 6.16           | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes              | This is included in the response template.   |                                      |
| 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              | <p>Page 4 of the complaints policy states “we will encourage staff to try to resolve complaints at the earliest opportunity, thereby benefiting the customer and organisation.”</p> <p>Page 9 of the complaints policy states “A complaint response should be provided to the complainant when the answer to the complaint is known and not when the outstanding actions required to address the issue are completed.”</p> <p>Page 6 of the complaints policy states “All outstanding actions will be tracked and actioned promptly with appropriate</p> | As set out in the complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                |   |                  | updates provided to the customer. “   |                                      |
| 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              | The complaint response template used for responses ensures that this is made clear. |                                      |
| 6.19           | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> | Yes              | As above in 6.9.  |                                      |
| 6.20           | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.   | Yes              | Page 6 of the complaints policy outlines the 2-stage process.                       | As set out in the complaints policy. |

## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes              | <p>Page 9 of the complaints policy states “When a complaint is upheld there needs to be an appropriate remedy, and if they have not done so already the complainant should be asked how they would like their complaint to be resolved. The Local Government and Social Care Ombudsman advises that: ‘As far as possible the complainant should be put in the position he or she would have been in had things not gone wrong”</p> <p>Remedies include:</p> <ul style="list-style-type: none"> <li>• An apology.</li> <li>• An explanation of the way the matter was handled and what</li> </ul> | As set out in the complaints policy. |



| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                |   |                  | <p>went wrong.</p> <ul style="list-style-type: none"> <li>• Action by Waverley to make sure that the problem complained about does not happen again which could include a review of policy and procedures, and feedback to the complainant on how their complaint has been used to improve the service.</li> <li>• A face-to-face discussion/interview.</li> <li>• Compensation which may not always be money but could include vouchers or an offer to provide another form of assistance to the complainant.</li> </ul> |                                      |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes              | As above.   | As set out in the complaints policy. |
| 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              | Actions and agreed timeframes identified in complaint responses are monitored by the Service Improvement team until completion.   |                                      |
| 7.4            | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes              | Remedies are outlined in the policy.  | As set out in the complaints policy. |



## Section 8: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of</li> </ul> | Yes              | See Complaints Performance and Service Improvement Report 2024/25. |                          |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---------------------------|
|                | the landlord.   |                  |   |                           |
| 8.2            | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.                       | Yes              | Complaints Performance and Service Improvement Report is reviewed at the Landlord Services Advisory Board and published on the website. |                           |
| 8.3            | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes              |   | Not necessary in 2024/25. |
| 8.4            | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes              |   | Not necessary in 2024/25. |
| 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 necessary in 2024/25. |

## Section 9: Scrutiny &amp; 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              | Quarterly complaints report about learning from complaints is provided to the Landlord Services Advisory Board for review.  |                          |
| 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              | Quarterly complaints report about learning from complaints is provided to the Landlord Services Advisory Board for review.  |                          |
| 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              | Quarterly complaints report about learning from complaints is provided to the Landlord Services Advisory Board for review. Share report with Customer experience Group and Housing Service manager team |                          |
| 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  | Yes              | Assistant Director of Communications and Customer Services is accountable.  |                          |

|     |   |     |  |  |
|-----|---|-----|--|--|
|     | identify potential systemic issues, serious risks, or policies and procedures that require revision.  |     |  |  |
| 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 | Portfolio Holder for Customer Services and IT  |  |
| 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 | Quarterly complaints report about learning from complaints is provided to the Landlord Services Advisory Board for review. |  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and</li> </ul> | Yes | Quarterly complaints report about learning from complaints is provided to the Landlord Services Advisory Board for review. |  |

|            |   |            |   |  |
|------------|---|------------|---|--|
|            | <p>progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>   |            |   |  |
| <p>9.8</p> | <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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | <p>Yes</p> | <p>Training offered by the Complaints Officer stresses that all complaints must be handled respectfully and colleagues must cooperate with enquiries from the assigned investigating officer.</p> <p>Training material is based on guidance and resources from the Housing Ombudsman Service.</p> | <p>See slides 7 and 10 in the document “Complaints Procedure Presentation March 2024”.</p> |