

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually. Evidence should be included to support all statements with additional commentary as necessary.

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

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’</i>	Yes	Section 3 ‘Scope of this policy’ provides a definition of a complaint. The wording is different but covers all points required.
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	Covered in section 3 ‘Scope of this policy’ Section 12 ‘Additional Information for Tenanted Housing Complaints’ in the policy regarding third party representatives complies.
1.6	<i>... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.</i>	Yes	Section 8 ‘How to complain’ complies and covers putting things right. It is standard practice to raise a complaint should the resident request that we do so. The policy gives clear examples of how to make a complaint and how this will be logged.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Section 4 ‘Exemptions to this policy’ addresses the only circumstances when a complaint wouldn’t be accepted. Contractor complaints are excluded from main policy but included in section 12 ‘Additional information for Tenanted Housing Complaints’.

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 4 'Exemptions to this policy' lists what would not be covered by the policy.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	Section 4 'Exemptions to this policy' complies. Wording of section 4 says we wouldn't <i>usually</i> investigate a complaint under certain circumstances. In the interests of being fair and reasonable, this is always assessed on a case by case basis.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Section 4 'Exemptions to this policy' covers service requests. Service requests are triaged as such by the Customer Resolution team. Where no investigation is required and a solution can be offered quickly, the complaint service request is handled and responded to immediately.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Acuity carry out surveys on our behalf and ask relevant questions in line with Tenant Satisfaction Measures (TSMs). Acuity will signpost to the complaints process if customer is dissatisfied. If the information captured has all the detail to log the complaint this is passed to the customer resolution team to log a complaint.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>Section 8 'How to complain' details channels to complain.</p> <ul style="list-style-type: none"> • Online Form – www.somerset.gov.uk/complaints • Telephone – 0300 123 2224 • Email – generalenquiries@somerset.gov.uk • Mail – Customer Experience Team, Somerset Council, County Hall Taunton TA1 4DY <p>Section 12 'Additional information for Tenanted Housing Complaints' includes social media as a method for making a complaint. Where we are able to identify a complainant by the post online, we will attempt to engage with them in line with the policy to manage their complaint.</p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>Accessibility statement at the start of the policy complies.</p> <p>Section 12 'Additional Information for Tenanted Housing Complaints' clearly sets out the complaints process and the timescales for responding.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>Somerset Council website has the all the necessary details on how to raise a complaint -</p> <p>Complaints, comments and compliments (somerset.gov.uk)</p>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>Section 7 'Equalities' complies.</p> <p>Section 8 'How to complain' (and refers to Reasonable Adjustments Policy).</p> <p>Section 14 'Unreasonable customer behaviour' complies.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>Regular newsletter mailings to tenants include details of the Complaints Policy and how to complain. Folder is retained on file by Customer Resolution Team with evidence of these publications.</p> <p>Included in Tenancy Handbook and online.</p>

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We include HO contact information and news updates in our regular newsletters to tenants.</p> <p>Following a recent transition to one Council the request for this information has been submitted to the website team to add all the necessary contact details on the new Somerset Council website</p>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	<p>Section 13 Ombudsman Services</p> <p>We include HO contact details at stage one of our complaints process so that residents can seek advice from the HO at any stage of their complaint.</p> <p>Following a recent transition to one Council a request for this information has been submitted to the website team to add all the necessary contact details for the Housing Ombudsman on the new Somerset Council website</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes	The Customer Resolution team fulfil this role. The team consists of three members of staff, two of which are dedicated full time to complaints. The team consists of the Performance and Improvement Lead, the Senior Case Manager, and the Case Manager.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Customer Resolution team oversee and gatekeep all housing complaints, to ensure quality, impartiality, and fairness. The Customer Resolution team attend regular webinars and training delivered by the HO or HQN to remain up to date and upskill knowledge. This learning is then passed to the Housing Directorate.

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	‘Credibility’ section of the policy complies. Training was carried by the Customer Experience team in the month of November 2022, providing detailed guidance on how to effectively respond to a complaint. The Customer Resolution team attend regular webinars and training and have a wealth of complaints experience in a housing environment. They have access to staff at all levels across the directorate and can propose and agree resolution advice at any point during the complaint process.

Section 4 - Complaint handling principles

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents.</p> <p>When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>We engage with the complainant if we think their concerns can be resolved quickly in the first instance and are confident that we know what has gone wrong and why. This will be recorded as a stage 1 complaint and a response sent out immediately.</p> <p>Section 12 'Additional Information for Tenanted Housing Complaints' We will acknowledge receipt of the complaint within 5 working days. The acknowledgement will set out our understanding of the issues, and the outcome requested by the resident. If anything is unclear, we will ask for clarification and a full description of the complaint will be agreed.</p>
4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking.</p> <p>If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	<p>Complaints are directly triaged by the Customer Resolution team an acknowledgment is sent using a template for stage 1 and 2 clearly setting out our understanding of the complaint, the issues we need to address, and the outcome sought by the resident.</p> <p>If anything remains unclear, the complainant is asked within the acknowledgement to get back in contact within 3 working days.</p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>Section 2 'Our principles – Fairness' complies. All housing complaints are overseen by the Customer Resolution team to ensure impartiality.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Section 2 'Our principles – Fairness' complies.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>All reasonable arrangements are discussed and agreed with the resident during the complaint investigation.</p> <p>Section 8 of policy 'How to complain'</p>

			We will make reasonable adjustments to our complaints process ensuring customers with a specific need are not at a disadvantage when accessing the service. This includes making this Policy available in an alternative format on request. Please see our Reasonable Adjustments Policy for more details.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Residents are contacted at stage one of the complaints process to discuss the complaint. Residents can use stage two as their opportunity to set out their position or comment on our findings if they are not satisfied with the response at stage one. Stage two is considered the 'final decision' on a complaint. We try to speak or meet with the resident at stage two. Staff members who are complained about are given the opportunity at the complaint investigation stage to set out their position and comment on findings.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' of policy applies under the heading 'Stage Two'.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	The policy does not refuse to escalate a complaint unless one of the exemptions in section 4 'Exemptions to this policy' applies.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	A full audit of the case will be retained on iCasework (complaints system). Customer data is retained in line with the Council's Data Retention Policy.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Section 14 'Unreasonable customer behaviour' section of the policy applies and refers to the 'Managing Unacceptable Customer Behaviour Policy' which is available on Somerset Council's website.

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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	We do not make assumptions until we have the full picture of the complaint and we have had the opportunity to investigate, but we will be clear with residents as to what we are able to do to resolve a complaint. We manage expectations through the stage 1 complaint.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Section 8 of policy 'How to complain' complies. We engage with the complainant if we think their concerns can be resolved quickly in the first instance and are confident that we know what has gone wrong and why. This will be recorded as a stage 1 complaint and a response sent detailing action to resolve.
4.5	Landlords should 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 where this is reasonable.	Yes	Sections 3 'Scope of this policy' and 12 'Additional information for Tenanted Housing Complaints' complies. Complainants may be accompanied by representatives at any meeting where this is considered reasonable.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This would always be included in our complaint responses.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Yes, unless the resident is aware of a staff member or contractor's identity, we would usually refer to a staff member by job title and use wording such as 'our contractor' in our responses.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We contact the customer where a complaint deadline cannot be achieved, to advise them when a complaint needs to be extended and why. The Customer Resolution team use iCasework to keep the complainant and investigating officer up to date of contacts

			received.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture	Yes	Acuity carry out surveys on our behalf with our tenants, and record complaint handling feedback. TSM Satisfaction Survey includes two measures on complaint handling. Project for the Senior Case Manager to introduce customer satisfaction surveys in the future.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Staff have access to counselling services through work if required, and are provided with support by their line managers where needed. More work is needed to look at this in a complaints context, which has been assigned to the Senior Case Manager.
4.19	Any restrictions place on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Section 14 'Unreasonable customer behaviour' section of the policy applies. The Customer Resolution team carry out an assessment of the customer's behaviour against the Unreasonable Customer Behaviour Policy before restricting contact with the housing directorate. Usually, a letter is sent to the customer before invoking the policy to advise that their behaviour has triggered the policy but where action may be taken if it continues. Part of the assessment is to consider any vulnerabilities under the EA 2010.

Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	No	Sections 2 'Our principles' and 12 'Additional Information for Tenanted Housing Complaints' complies with the timeframes in the code of practice. We are making improvements to ensure that complaints at stage one are answered in the agreed timescales. This is monitored by the Customer Resolution team and extension are only recommended as a last option. Currently our agreed working practice is to recognise the need to extend a complaint in

			expectational circumstances. The Customer Resolution team work with the investigating officer to try and ensure that the complaint is answered in the extended deadline date of 10 working days were possible.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Section 9 'Our corporate complaints process' (under stage 1) applies. We are committed to taking ownership of any outstanding actions and when the customer can expect them to be completed. Actions are logged and tracked by the Customer Resolution team.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Customer Resolution team gatekeep complaints and provide the relevant investigating staff member with bullet pointed issues to address in the complaint response. Regular intervention measures are set out by the Customer Resolution team to monitor the complaint handling. Complaint responses come back through the team for quality control before it is sent to the customer.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' applies, under the heading Stage One. The Customer Resolution team use templates which set out the complaint stage; whether the complaint is upheld, partly upheld, or not upheld; the reasons why; any outstanding actions and who will be tracking these through and details of any remedy offered. All stage one complaints are closed with standard wording of the escalation process to review stage (stage 2). The HO details are provided for advice and guidance. At stage two, complaints are closed with standard wording on how to escalate to the HO.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies under the heading 'Stage Two'. Section 4 'Exemptions to this policy' complies
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies under the heading 'Stage Two'. Once the complaint is triaged by Housing, we will use an acknowledgement template for stage 2 to set out (bullet point) our understanding of the complaint, the issues we need to address, and the outcome sought. If anything remains unclear, the Customer Resolution team will contact the resident by telephone or email to gain clarification and then send the formal acknowledgement. The complaint handler will also speak to the resident for an understanding of their complaint, propose remedies and discuss outcomes.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Two stage Complaint Policy complies Exemption may apply in the damp and mould policy, if you have had a full survey conducted for damp and mould and disagree with these findings this will be escalated to stage two in the complaint process, as the survey will act as the stage one reply. This approach has been implemented to assist residents removing a process of unnecessary investigation work that has already taken place.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies, under the heading 'Stage Two'.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	No	<p>Section 12 'Additional Information for Tenanted Housing Complaints' complies, under the heading 'Stage Two'.</p> <p>As highlighted;</p> <p>We are making improvements to ensure that complaints at stage two are answered in the agreed timescales. This is monitored by the Customer Resolution team and extension are only recommended as a last option. Currently our agreed working practice is to recognise the need to extend a complaint in expectational circumstances. The Customer Resolution teamwork with the investigating officer to try and ensure that the complaint is answered in the extended deadline date not exceeding 10 working days were possible.</p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>Section 12 'Additional Information for Tenanted Housing Complaints' complies, under the heading 'Stage Two'.</p> <p>The Customer Resolution team use templates which set out the complaint stage; bullet point the issues to be addressed; whether the complaint is upheld, partly upheld, or not upheld; the reasons why; any outstanding actions and who will be tracking these through and details of any remedy offered.</p> <p>All stage two complaints are closed with standard wording on how to escalate to the HO should the resident remain dissatisfied.</p> <p>No third stage.</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	Not applicable
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	Not applicable

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies under the heading Stage One, although we will only extend by 10 working days.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' complies under the heading Stage One. Residents are notified in writing of how to escalate the complaint to

			the HO.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Customer Resolution team gatekeep housing complaints which means that historic complaints can be accessed and considered.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Separate issues raised as new complaint. Related issues are added into existing complaint but also logged for statistical purposes. This is considered on a case-by-case basis.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' under the heading Stage Two complies.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. landlords should provide the Housing Ombudsman's contact	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' under the heading Stage Two applies. Residents are notified in writing of how to escalate the complaint to the HO.

Stage 3

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

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take to put things right.	Yes	Section 2 'Our principles' under 'Credibility' of the policy applies. The Housing Performance team have autonomy to resolve complaints quickly and efficiently. The Customer Resolution team's role is to provide impartiality, and in gatekeeping responses will always deliver transparency and admit where we have fallen short. A resolution/next steps is always provided.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Section 12 of policy 'Additional Information for Tenanted Housing Complaints' complies, under heading of Redress. Housing's Redress Policy applies.

6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Section 12 'Additional Information for Tenanted Housing Complaints' under heading of Redress applies. The Customer Resolution team track any outstanding actions through with service areas (eg training, policy reviews) and are responsible for organising any remedy payment or delivery.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to, as well as any distress and inconvenience caused.	Yes	Housing's Redress Policy applies, as well as section 12 'Additional Information for Tenanted Housing Complaints' section of the policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Housing Performance team monitors trends and learning from complaints and highlights any changes needed to service area and/or senior leadership team. Section 2 'Our principles' of the policy applies under the heading 'Credibility' and also section 12 'Additional Information for Tenanted Housing Complaints'
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Statutory payments covered in Housing Redress Policy.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny	Yes	Reports are provided 6 monthly and annual reports to Tenant Strategic Group, Housing Briefing, members and Senior Management. It is also referred to in the Complaints Policy section 12 'Additional Information for Tenanted Housing Complaints'

	panels.		Regular updates in tenant and staff newsletters. 'You Said, We Did' on the website.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Director of Housing and Portfolio Holder for Housing fulfil this role. Corporate Scrutiny Committee (15 Cllrs) who have sight of complaint reports.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Compliant in that reports containing this information are provided 6 monthly to Housing Briefing (PfH) and TSG. Trends and learning currently included as a project for the Customer Senior Case Manager. Compliant in that individual Ombudsman outcomes are shared with Councillors or Members if they have been involved with the complaint. Management responses are tracked through the Customer Resolution team. The self-assessment document will be provided and published to the Somerset Council website at least once a year.

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Customer Resolution team - Senior Case Manager currently fulfils this role through HSMT. The Senior Case Manager is currently considering this as part of their project work. Training and coaching are currently carried out by the Performance and Improvement Lead and Senior Case Manager.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	Customer Resolution team coordinate complaints where investigations cross multiple areas. This team support the collaboration of complaint investigation when need. The Senior Case Manager will be implementing a working process to ensure systemic collaborative working as part of complaint handling inclusive of any lessons learnt following a complaint reply.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Commitment to complete self-assessment every twelve months in line with the Code. More assessments have been undertaken in recent months due to significant policy changes due to LGR.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This further assessment carried out October 2022 to ensure new draft Somerset Council Policy is compliant with HO Code and reflects Housing directorate's needs.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>Document presented to Portfolio Holder – see action above at 7.3</p> <p>Once completed</p> <p>Assessments are included in 6 monthly and annual reports, newsletters, Housing Briefing 7.3</p>