

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.

The Action Plan for work to be undertaken to become fully complaint is attached at the bottom of this self-assessment

Appendix A: Self-assessment form

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Council Complaints Policy (Updated 2024) - Corporate Complaints Policy (wigan.gov.uk)	Definition in policy: <i>A complaint is 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 a group of individuals or residents</i>
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	In current Complaints policy – Corporate Complaints Policy (wigan.gov.uk)	Current policy states: <i>You can make a complaint to us in whichever way is easiest for you. This policy applies to any customer of the council, or a person or body acting on behalf of the council.</i> <i>A customer of the council is anyone who:</i> • is receiving or seeking to receive a service from the Council or its contractors • is acting on behalf of an individual or group of individuals <i>We are committed to improving accessibility for everyone when accessing any of our services. We will ensure you are able to access support to make a complaint or provide the opportunity for you to confirm that you have given consent for a representative to act on your behalf.</i> The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
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	Complaints policy – Corporate Complaints Policy (wigan.gov.uk) Reflected in Jadu – system guidance	The policy sets out definition for Service Requests: <i>A service request is a request from a customer requiring action to be taken to put something right. Service requests are not complaints, but they are recorded, monitored and reviewed regularly.</i> JADU system affirms the classification of compliant and service request. Detailed guidance is available to all staff on intranet: Complaints. Training on Jadu and the new code sets this out also.

				Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow
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	In current Complaints policy – Corporate Complaints Policy (wigan.gov.uk) Jadu system rolled out and training is included in this.	Current policy states: <i>We will investigate your complaint and the outcomes you are seeking, and always aim to resolve your complaint to your satisfaction. We will listen and understand your concerns, allowing you time to fully explain your circumstances. We will ensure that our approach to complaint handling reflects the need to:</i> · have a collaborative and cooperative approach towards resolving complaints · take collective responsibility for any shortfalls identified through complaints · act within the professional standards for engaging with complaints as set by any relevant professional body Examples available such as social media and inquiries being identified as complaints The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Added to TSM Letter to state that any comments made would not be followed through with as a complaint. If there was a complaint guidance was provided in the letter on how a complaint can be made. Survey questions	Wording added to 2024 Tenant Satisfaction Measures

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Clear in policy Corporate Complaints Policy (wigan.gov.uk)	Clear parameters set out in policy (pp. 3-4).
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. - Matters that have previously been considered under the complaints policy.	Partial	In current policy Corporate Complaints Policy (wigan.gov.uk)	Set out in current policy (pp. 3-4). The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
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	In policy - Corporate Complaints Policy (wigan.gov.uk) There is discretion outside of the time limit. <i>Needs to be updated to reflect Ombudsman recommendation on Policy</i>	Policy states: <i>Complaints must be made not later than twelve months from the date on which the issue(s), which is the subject of the complaint, occurred or twelve months from the date on which the issue(s) came to the notice of the complainant. However, if there is a valid reason why the complainant did not or could not make the complaint within the timescale, or if there is a reasonable possibility for the complaint to be effectively and meaningfully investigated then it should be investigated and responded to.</i> This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Under policy section 'complaints that cannot be dealt with under this procedure' (p.5) it states: <i>If your complaint falls into one of these categories we will tell you, and let you know how it will be dealt with</i> The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'our promise' section of the policy (p.6).

	must consider the individual circumstances of each complaint.			
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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	In policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	Policy states: <i>We will make reasonable adjustments for customers where appropriate under the Equality Act 2010. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities that have been disclosed. Any agreed reasonable adjustments will be kept under active review.</i> This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Complaints form asks if the complainant requires additional support so adjustments can be identified Triage process being further developed to ensure adjustments can be more easily identified and monitored
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	In policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	Covered by definition in policy as covered in earlier sections. There has been a series of staff communications about the complaints codes and policy. This was also covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow
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	In policy - Corporate Complaints Policy (wigan.gov.uk) Website updated to the complaints pages.	Policy states: <i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery</i> Welcoming feedback on our services is part of Wigan Council's Progress With Unity work (See the Person / Listen Deeply) Staff undertake training on New Era and associated behaviours. We have undertaken a major piece of work on our culture, building on national priorities on the tenant voice and tackling stigma (See the Person, See the Home Experience). We have incorporated complaint handling into this culture work. This was also covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow Tenant Complaints Focus Group established to gather feedback and feed into the Council's work.
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	The complaints process ensures complaints are accepted from complainants in all formats. Online accessibility is completed for all published information. PDF functions for Read Aloud and Translate Reasonable adjustments are made available, staff are aware of this. There is help available at customer facing offices such as the Life Centre/Contact Centre that can offer support accessing different versions. However, there is further work to be done to evidence the effectiveness of this and how it is monitored. The last update to the Complaints Policy was shared with Housing Advisory Panel: Agenda for Housing Advisory Panel on Tuesday, 26th March, 2024, 2.00 pm. This ensured there was tenant oversight of the

				policy. The decision was made to go via Housing Advisory Panel as the Complaints policy is corporate but still ensured there was tenant oversight and input. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025. Information on how this will be monitored to ensure it is effective to be made clearer. All future updates to the Complaints Policy will also be shared with the Housing Advisory Panel.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	This is published on our website, information about the policy is also included in social media posts and tenant engagement communications. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025. Publication and promotion of the policy to be made more explicit within the policy and become fully compliant
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	This is covered by the policy which states: <i>You can make a complaint to us in whichever way is easiest for you. This policy applies to any customer of the council, or a person or body acting on behalf of the customer.</i> <i>A customer of the council is anyone who: · is receiving or seeking to receive a service from the Council or its contractors · is acting on behalf of an individual or group of individuals 6 We are committed to improving accessibility for everyone when accessing any of our services. We will ensure you are able to access support to make a complaint or provide the opportunity for you to confirm that you have given consent for a representative to act on your behalf.</i> This is also set out in correspondence. Staff have been made aware of this.
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	Policy makes this clear - Corporate Complaints Policy (wigan.gov.uk) Templates and processes reflect this also.	Set out on p.10 of Complaints Policy. Included in Stage 1 and Stage 2 letters Included on the website: Housing Complaints

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	In accordance with the codes, we have a lead officer who oversees the complaint process and a lead member who are updated on complaint performance and trends. Governance overseen by: Assistant Director for Customer Experience and Support Assistant Director for Housing Elected Member Lead: Cllr Dane Anderton Corporate Complaints Policy (wigan.gov.uk)	Housing Customer Care Team pick up and handle any complaints in relation to the repairs service. The Corporate Complaints Team pick up all other complaints and ensure these are passed to the relevant service and the complaints manager leading that team. Where complaints cross a number of services, the Corporate Team will identify the lead service and pass the complaint to them. They will then coordinate complaint handling between themselves and other relevant teams.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Jadu system enables centralised case recording.	Policy and Wigan Council's Progress with Unity Six Ways of Working for staff provide empowerment for staff to act to resolve complaints. Quality Assurance function has been built into JADU complaints system. Regular performance reviews are conducted with the Corporate Complaints Team, these include listening to calls received via the complaints line and scoring against the call quality monitoring standards. The complaints teams have access to staff at all levels and that stage 2 reviews are carried out by an independent officer
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	Complaint training on policy and Jadu system has been carried out.	This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow To adequately resource complaint handling there has been an increase in staff resource within the Customer Care Team. Furthermore, there has been additional capacity provided to develop and implement the JADU system. There has been a series of staff communications about the complaints codes and policy. Tenant Complaints Focus group established to provide added quality assurance and checks. Group is updated on learning and changes made based on feedback from complaints.

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	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	In place.

	by this Code. Residents must not be treated differently if they complain.			
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	The initial training for staff also covered these aspects. There is work planned to increase awareness with third party contractors and to review the case recording and communication systems that are in place. Complaints process for tenants involving a third party needs to be clarified within the policy to avoid having additional stages but also to ensure we are aware of issues / trends to inform improvement. Specific work being done with contractors to improve complaint handling and response times. This includes review of systems and changes to Key Performance Measures within specifications as contracts come up for procurement and work being done with existing contractors via contract review meetings to address issues with outstanding complaints. Going forward, See the Person, See the Home and complaints training being offered to contractors. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025 and will clarify the arrangements in place with third parties.
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Partial	Recognise that there is more that we need do to improve customer experience.	
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	In policy and in the templates. In policy - Corporate Complaints Policy (wigan.gov.uk)	The initial training for staff also covered these aspects. Update to policy required to include the following requirements in the landlord's stage 1 acknowledgement and stage 2 escalations acknowledgement: - The outcomes the resident is seeking - Which aspects of the complaint the landlord is and is not responsible for. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025 to clarify these points.
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	In policy - Corporate Complaints Policy (wigan.gov.uk) and in the templates. Jadu supports ID of complaint issues and service requests	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	• Jadu training • Quality Assurance Programme • Complaints Quality Assurance system • Complaints survey findings • Complaints Tenant Focus Group	Set out in policy clearly. The policy states: <i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</i> And in 'our promise' section of the policy (p.6). The initial training for staff also covered these aspects. The wider action plan relating to quality assurance for housing teams will be kept under review. Work for continual improvement is ongoing.

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.	No	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'time-scales' section of the policy (p.7). The policy does not currently state that we will agree suitable intervals for keeping complainants updated. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025 to include the requirement, that it will agree with the resident, suitable intervals for being updated on their complaint, when the landlord's response falls outside of the extended timescales set out in the Code. The wording in holding letters and communications with complainants will also be reviewed.
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk) Jadu system allows for reasonable adjustments to be recorded. Although compliant there is more to do to facilitate cross system data sharing to ensure that these are kept under review and applied in all interactions between the individual and the Council.	The Jadu system has functionality to record required reasonable adjustments. This information is also collected when asking for preferred method of contact and any other relevant information. The complaints form on JADU now asks if the complainant requires additional support so adjustments can be identified. This information can be extracted as a report. However, there is more work to do to ensure that there is regular monitoring processes consistently across all housing services. This area aligns to the vulnerability project and IT/Performance and Insight Team data warehouse. A triage process is being further developed to ensure adjustments can be more easily identified and monitored consistently.
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the 'Complaints Procedure' section of the policy (p.8)
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk) Jadu system case recording	Jadu allows this but there are improvements to be made for capturing and recording third party correspondence. There is work planned to increase awareness with third party contractors and to review the care recording and communication systems that are in place. Work still ongoing.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	In complaints policy - Corporate Complaints Policy (wigan.gov.uk) In new redress policy – Putting Things Right: Redress Policy	Set out in the 'remedies' section of the Policy (p.10). The Redress Policy Approved and implemented; the policy is published on the website
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Under section 'Unreasonable Complainant Behaviour' in complaints policy (p.12). Restrictions are recorded by the Corporate Complaints Team and reviewed as needed.

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			Restrictions kept under review. Stage 1s, no restrictions listed for housing in the last 12 months. Stage 2 has no restrictions.
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Under section 'Restricting access to Council services' in the complaints Policy (p.13) All staff are trained on the Equality Act.

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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out on pp.6-8 of the policy.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk) and website. JADU monitoring reports.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) Details also set out on website. JADU monitoring reports.	Set out on pp.6-8 of the policy. The initial training for staff also covered these aspects. We monitor our performance to ensure we comply with the timescales. JADU enables quicker allocation of complaints in the future, as well as monitoring of target dates, so we expect to see performance improve in 2024/25.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Improvements seen as anticipated, average number of days to complete complaints significantly reduced (See 2025 Complaints Annual Report) 6.2 – Logging figures are collected but not monitored.
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Stipulated under section ‘Local Government and Social Care Ombudsman (LGSCO)’ of the complaints policy (p.10). The initial training for staff also covered these aspects. The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
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	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU allows tracking of corrective action and pulls through to dashboard.	
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	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU process / templates	Tenant Complaints Focus Group established and have been undertaking quality assurance checks on complaints responses. Changes made to response letters as a result are an example of the impact this group is having. The Complaints Governance has been refreshed to incorporate the key role this group has. Work will continue to develop quality assurance processes, including tenant voice.

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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Case examples available
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU templates	This is now included in complaints correspondence. Staff have received initial training on this and it is included in ongoing complaints handling training. Tenant Group have quality assured Complaints Letters and changes resulting from this have now implemented. All future changes to complaints processes and documentation will be shared with this group for review. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role. Action Plan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group which covers quality assurance.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the complaints policy under section 'The Complaints Procedure' (p.8)
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	The initial training for staff also covered these aspects. We monitor our performance to ensure we comply with the timescales. JADU will enable quicker allocation of complaints in the future, as well as monitoring of target dates, so we expect to see performance improve.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	Stage 2 complaints will be investigated by an independent Officer appointed by the Chief Executive The Complaints Policy will be reviewed (6.11 and 6.12) based on the recommendations made by the Housing Ombudsman, August 2025
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	6.11 – Logging figures are collected but not monitored.

6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Stipulated under section 'Local Government and Social Care Ombudsman (LGSCO)' of the complaints policy (p.10).
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	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU function for recording corrective actions and providing reports.	Set out in the policy. The initial training for staff also covered these aspects. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow The Complaints Policy will be reviewed based on the recommendations made by the Housing Ombudsman, August 2025
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'service standards' section of the policy (p.7)
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) And templates	Set out in 'Formal Complaint - Stage 2' of the policy (p.9) This is also now included in complaints correspondence. Staff have received initial training on this. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role. QA assurance workplan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'Formal Complaint - Stage 2' of the policy (p.9)

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing, procedures or practices.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) In Putting Things Right Policy: Putting Things Right Redress Policy	Set out in the 'Remedies' section of the complaints policy (p.10) Also covered by the new Redress Policy that has been approved by Cabinet. This is also now included in complaints correspondence. Staff have received initial training on this. A Quality Assurance Workplan is in place and being monitored by the Tenant Complaints Focus Group and the Council Officer Complaints Task and Finish Group The Redress Policy is published and implemented following approval by Cabinet
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) In Putting Things Right Policy: Putting Things Right Redress Policy	This is set out in 'redress' section of the complaints policy (p.10) and in the new Redress Policy. Quality Assurance function has also been built into new JADU complaints system. Regular performance reviews are conducted with the Corporate Complaints Team, these include listening to calls received via the complaints line and scoring against the call quality monitoring standards.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes		
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	2025 complaints self-assessment and report. - Tenant annual report and KPI reports - Annual reports taken to Council cabinet and quarterly reports taken to Housing Advisory Panel and Senior Management Team.	Existing mechanisms in place to produce annual performance and improvement reports under the old code. These have been published online. These have been strengthened to take account of the requirements of the new codes and will also be published online. We have worked with tenants to agree content and format for the annual tenant reports. Once approved, these will be sent to all tenants and published online. A – 2024 and 2025 self-assessment completed. B – The new Jadu system has improved the reporting functionality. However, there is more development needed to fully capture refused complaints. C – We can evidence action taken in response to non-compliance determinations by the Ombudsman. D – Jadu has provided robust ability to capture improvements made resulting from complaints. Furthermore, governance and quality assurance processes have been strengthened to report themes and changes as a result. E – Following receipt of an annual report from the Ombudsman, findings and recommendations are being actioned and reported to both the Ombudsman and through the Council's governance structure to ensure learning is applied. More information on our performance can be found at: https://www.wigan.gov.uk/Resident/Housing/Council-homes/How-are-we-doing/Complaints-data.aspx We can identify complaints that have not been investigated by running a report on the following status's withdrawn, existing complaint, logged in error and sign posted to relevant service. For withdrawn complaint we add the reason for withdrawal so could run text analysis to categorise the reasons Tenant Annual Report for 2025 is being drafted. A further action for 25/26 is to develop integrated reporting to assess refused complaints.
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.	Partial	Previously this has been reported to the Housing Advisory Panel (June and September 2025) and published online Browse meetings - Housing Advisory Panel Annual reports are taken to Council cabinet and quarterly reports go to Housing Advisory Panel and Senior Management Team.	The annual complaints report taken to Housing Advisory Panel and Cabinet. The decision of Housing Advisory Panel and Cabinet in reviewing the annual complaints report will be published on the council's website. Half Yearly Report Developed (Agenda for Housing Advisory Panel on Tuesday, 17th June, 2025, 2.00 pm) Presented to Housing Advisory Panel in September 2025, minuted and published online following the meeting (Agenda for Housing Advisory Panel on Tuesday, 9th September, 2025, 2.00 pm) Annual Ombudsman Complaints Report Presented to Audit, Governance and Standards Committee, (Agenda for Audit, Governance and Standards Committee on Thursday, 18th September, 2025, 6.30 pm) The Self-Assessment and Complaints Annual Report will be taken to the Housing Business Board in October.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This self-assessment is timely as it follows a significant review of the Complaints policy and development of a new Redress policy.	Carried out for 2025
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted.	Governance is in place to respond accordingly.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) Tenant annual report New complaints report Development day programmes	Set out in the complaints policy under section 'Learning from complaints and customer engagement' (p.20)
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		Tenant focus group held to shape content for performance reporting and annual report content – ensuring transparency.
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		Housing Service Manager Away day held to review complaints, develop quality assurance and promote awareness across services of requirements and positive complaints culture.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Assistant Director for Customer Experience and Support Assistant Director for Housing	Individual team meetings are being held to further embed positive complaints culture.
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 has been identified and confirmed	Wigan Council has a learning culture within the organisation. Revised governance and reporting processes have been put in place to ensure learning from complaints is embedded. However, there is some scope for improvement.
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.	No	New governance in place: - Quarterly corporate reports to Strategic Management Team and Housing Advisory Panel in progress - Annual report to go to Cabinet	Action Plan that covers quality assurance now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: - regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; - regular reviews of issues and trends arising from complaint handling;	Partial	MRC is a new role. However, has been appointed.	Completed as part of governance review.
				We also have Housing Advisory Panel tenant representative to lead on complaints. However, at the time of completing the 24/25 assessment the information online had not been updated. A request has now been logged to add the details as lead member for complaints to the Councilor; s portfolio details online.
				With JADU there is functionality to facilitate robust regular reporting into Housing Advisory Panel, Strategic Management Team and Cabinet on housing specific complaints.
				Annual tenant report went to Housing Advisory Panel.
				Arrangements are in place to meet new requirements moving forward.

	c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU enables collaborative working on complaints. Team Wigan behaviours give permissions for officers to respond to complaints accordingly.	Set out under 'service standards' section of the complaints policy (p.7) Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow Learning will feed into the Council's 'Be Accountable' and 'New Era' workstream. Wider Housing Training plan being developed, specific Complaints Handling has been completed

Appendix B: Self-assessment Action Plan

Appendix B contains the actions that have been completed from the 2024 Self Assessment to ensure compliance for 2025. Further actions are included that show the Council will reach compliance in 2026 where areas of non or partial compliance were identified.

Key to RAG rating:

	Completed
	On track
	Underway / partial actions outstanding / work that will be ongoing
	Delayed / not on track

Complaints Self-Assessment actions:							
15.	Dissatisfaction through Surveys	2023 Self Assessment	Housing Lead	Update Tenant Satisfaction Measures Survey information to reflect Ombudsman requirements	Complete	- Added to Tenant Satisfaction Measures letter to state that any comments made would not be followed through with as a complaint - Added guidance to make a complaint in Tenant Satisfaction Measures survey	
16.	Complaints Monitoring Reporting	2024 Self Assessment	Performance and Insight Team	Complaints monitoring report should support management of performance monitoring, identification of trends, and recording of learning.	As above	- Meeting held with elected lead member regarding their role as lead member for complaints. - Work plan for tenant scrutiny group agreed with lead HAP member. 2024/25 Complaints report now due (sept 25)	

17.	Summary Report of Complaint Types	2024 Self Assessment	Housing Lead / Performance and Insight Team	Develop a summary report of the types of complaints that we have not accepted and review this regularly.	As above	- JADU reports to be finalised and to inform a Quarter 3 report and identify corrective actions. - Develop complaint handling training.	
18.	Complaints Reporting Arrangements	2024 Self Assessment	Housing Lead / Performance and Insight Team / Programme Manager	Introduce new reporting arrangements to Officers, tenants, and Housing Advisory Panel on complaints, including a half-year report.	As above	- Meeting held with Cllr Anderton re: role as lead member for complaints. - Work plan for tenant scrutiny group agreed with lead HAP member. - First Tenant QUALITY ASSURANCE Focus Group for complaints meeting held 06/02/25, scheduled in for 2025 - Feedback collated and action to update letter templates completed	
19.	Tenant Voice and Quality Assurance	2024 Self Assessment Final actions due: Oct 2025	Tenant Engagement Manager / Performance and Insight Team / Programme Manager	- Build into Quality Assurance framework. - Build tenant voices into our quality assurance processes, including making changes to surveys to ensure dissatisfaction is clearly identified and acted on.	As above	- Overarching QUALITY ASSURANCEF drafted (due October 2025) - Tenant Scrutineers in place and involved in vulnerabilities review completed. 2024 TSM project completed, analysis completed 2025 TSM due (Oct 2025) - Phase 1 website review completed - Tenant engagement strategy has now gone through relevant governance and implemented. - Tenant QUALITY ASSURANCE Focus Group for complaints meetings underway	
20.	Complaint Reporting Process Communication	2024 Self Assessment Final actions deadline (transactional surveys): March 2026	Tenant Engagement Manager / Project Manager	- Review transactional surveys - Include how to make a complaint within some principles for housing surveys. - Incorporate clear communication within all tenant surveys on how a complaint can be made if this is what the individual wishes to do.	Original deadline: September 2025 New deadline: March 2026	- Completed for 2024 TSM survey and the comms plan. - Transactional surveys to be reviewed across services (Leadership away day) - delayed, work due to start September 2025 across all housing services. - TSMs due to start in October 2025 - Comms plan being developed – now a priority	
21.	Scrutiny of Housing Complaints	2024 Self Assessment	Housing Lead	Work with our Member for Complaints and the tenant lead on our Housing Advisory Panel, to improve scrutiny of housing complaints, to ensure we are accountable.	Completed	- Complaints position statement drafted - Held meetings with lead elected member and with lead HAP tenant representative on monitoring and action plan. - Tenant QUALITY ASSURANCE Focus Group for complaints in place - Annual report added to forward plan for Audit, Transformation Board and HAP	
22.	Complaint Handling Training	2024 Self Assessment	Housing Lead /	Build into Overarching Training Policy.	Completed	- Initial scoping of available training completed - Next steps – procure train the trainer model staff to be identified	

			Programme Manager	New complaint handling training for our officers, to promote a positive learning culture and consistently high standards of customer care.			
23.	Complaint Handling Process	2024 Self Assessment	Housing Lead / Repairs Lead	- Finalise a suite of process documents to ensure the complaints policy is followed consistently and we are transparent about the procedures we follow - Build upon information contained within the Housing Hub Teams Site - Development of a complaint handling process will need to be prior to delivery of any training	Completed	2023/24 action completed. - New actions added following recommendation s received from the Ombudsman in July 2025.	
24.	Channels for residents to make complaints	2024 Self Assessment	Customer Experience and Support Service Manager	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.	January 2026	Policy states: <i>We will make reasonable adjustments for customers where appropriate under the Equality Act 2010. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities that have been disclosed. Any agreed reasonable adjustments will be kept under active review.</i> This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Complaints form asks if the complainant requires additional support so adjustments can be identified In progress Triage process being developed to ensure additional support so adjustments can be identified	
25.	Understanding Complaints Volume	2024 Self Assessment	Housing Lead	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	Complete	<u>Completed</u> Policy states: <i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints</i>	

				complaint volumes are potentially a sign that residents are unable to complain.		<i>as a source of intelligence to identify issues and introduce positive changes in service delivery</i> Welcoming feedback on our services is part of Wigan Council's Progress With Unity work (See the Person / Listen Deeply) Staff undertake training on New Era and associated behaviours. We have undertaken a major piece of work on our culture, building on national priorities on the tenant voice and tackling stigma (See the Person, See the Home Experience). We have incorporated complaint handling into this culture work. This was also covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow Tenant Complaints Focus Group established to gather feedback and feed into the Council's work.	
26.	Accessibility of Complaints Policy	2024 Self Assessment	Housing Lead	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.	Complete	<u>Completed</u> The complaints process ensures complaints are accepted from complainants in all formats. Online accessibility is completed for all published information. PDF functions for Read Aloud and Translate Reasonable adjustments are made available, staff are aware of this. There is help available at customer facing offices such as the Life Centre/Contact Centre that can offer support accessing different versions. Complaints Policy shared with Housing Advisory Panel: Agenda for Housing Advisory Panel on Tuesday, 26th March, 2024, 2.00 pm. This ensured there was tenant oversight of the policy Decision made to go via Housing Advisory Panel as the Complaints policy is corporate but still ensured there was tenant oversight and input.	
27.	Publication of Complaints Policy	2024 Self Assessment	Customer Experience and Support Service Manager / Housing Lead / Complaints (Audit) Officer	3.5 The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	October 2025	<u>Completed</u> Policy is published on the Council's website Information about the Policy is included in social media posts and shared via the Tenant Voice and Engagement Team <u>In Progress</u> Publication and promotion within the policy itself will be look at as part of the Complaints Policy review in 2025	

28.	Third Party Awareness of Complaints Policy	2024 Self Assessment	Housing Lead	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. 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. 5.4 Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	A) October 2025 B) July 2026	<u>Completed</u> Set out in policy clearly. The initial training for staff also covered these aspects. <u>In Progress</u> A) Complaints process for tenants involving a third party needs to be clarified within the policy to avoid having additional stages but also to ensure we are aware of issues / trends to inform improvement. B) Specific work being done with contractors to improve complaint handling and response times. This includes review of systems and changes to Key Performance Measures within specifications as contracts come up for procurement and work being done with existing contractors via contract review meetings to address issues with outstanding complaints. Going forward, See the Person, See the Home and complaints training being offered to contractors. This is in line with re-procurement timelines.	
29.	Third Party Complaint Handling	2024 Self-Assessment	Housing Lead	5.5 Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	July 2026	<u>In Progress</u> Compliant but recognise that there is more to do to improve customer experience Specific work being done with contractors to improve complaint handling and response times. This includes review of systems and changes to Key Performance Measures within specifications as contracts come up for procurement and work being done with existing contractors via contract review meetings to address issues with outstanding complaints. Going forward, See the Person, See the Home and complaints training being offered to contractors.	
30.	Complaints Handling Quality Assurance	2024 Self Assessment	Customer Experience and Support Service Manager / Housing Lead	5.8 At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind;	Ongoing	<u>Complete</u> Set out in policy clearly. The policy states: <i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</i>	

				b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		And in 'our promise' section of the policy (p.6). The initial training for staff also covered these aspects. <u>In Progress</u> The Complaints Quality Assurance Action plan is being maintained into 2025 and kept under review	
31.	Keeping residents informed on the process	2025 Self-Assessment	Customer Experience and Support Service Manager / Housing Lead / Complaints (Audit) Officer	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.	October 2025 (In line with policy review)	<u>Complete</u> Set out in 'time-scales' section of the policy (p.7). <u>In Progress</u> The wording in holding letters and communications will be reviewed alongside the policy update	
32.	Reasonable Adjustments	2024 Self-Assessment	Customer Experience and Support Service Manager / Housing Lead / Complaints (Audit) Officer	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.	A) January 2026 B) January 2026 C) Ongoing	<u>Complete</u> Complaints form on JADU now asks if the complainant requires additional support so adjustments can be identified. Can be pulled off as a report. <u>In Progress</u> A) Triage process being developed to identify additional support requirements so adjustments can be identified B) A regular monitoring process will be established This will align with the vulnerability project and the IT/Performance and Insight Team's Data Warehouse Project	
33.	Complaint Record Keeping	2024 Self-Assessment	Housing Lead	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.	July 2026	<u>In Progress</u> JADU allows this for the Council but improvements need to be made for third party contractors Work is planned to increase awareness with third party contractors and to review the care recording and communications systems that are in place This work was not completed in 2024 due to the scale of work required. Being scoped as requires resource to make system changes / developments forming part of wider transformation of arrangements with contractors (linked to re-procurement)	
34.	Remedy of Complaints	2025 Self-Assessment	Housing Lead	5.13 Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure	Complete	<u>Complete</u> The Redress Policy was reviewed in 2024 and published and implemented following approval from Cabinet	

				appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			
35.	Restrictions	2024 Self-Assessment	Housing Lead	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.	Complete	<u>Complete</u> Restrictions are kept under review. There have been no restrictions for Stage 1 complaints for the last 12 months as of August 2025	
36.	Monitoring of Complaints Types	2025 Self-Assessment	Housing Lead / Performance and Insight Team	6.2 Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	December 2025	<u>In Progress</u> Complaints are logged but not monitored. This will be added to the Complaints Data Dashboard to ensure this information is monitored by relevant governing bodies.	
37.	Reasons for Decisions	2024 Self Assessment	Housing Lead	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.	Complete	<u>Complete</u> A tenants complaints focus group has been established to assist with Quality Assurance of Complaints work. For example, the wording of letters has been changed based on their feedback. The Complaints Governance has been refreshed	
38.	Updating Residents	2024 Self-Assessment	Housing Lead	6.9 Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Ongoing	A Quality Assurance work plan is now in place and overseen by the Tenant Complaints Focus Group and the Council Officer Complaints Task and Finish Group. This group regularly conducts sample checks of Complaints cases and responses, and have brought about changes and improvements because of this. One example being the wording and format of Stage 1 letters. <u>In Progress</u> Further work will be carried out to develop quality assurance process	

				g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
39.	Acknowledging Stage 2 Complaints	2025 Self-Assessment	Customer Experience and Support Service Manager / Performance and Insight Team	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.	January 2026	<u>In Progress</u> Need to add Stage 2 complaints data regarding acknowledgement of a Stage 2 complaint to the Complaints Data Dashboard	
40.	Resident Reason for Stage 2 Complaint	2025 Self-Assessment	Customer Experience and Support Service Manager	6.12 Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	October 2025	<u>In Progress</u> Whilst an explanation is asked for to assist with the investigation of the Stage 2 Complaint, it is not a mandatory field in the Complaints Form. However, the wording within the policy does not explicitly say a reason is not required and need to be updated. Will be picked up as part of the policy review.	
41.	Concluding a Stage 2 Complaint	2024 Self-Assessment	Housing Lead	6.19 Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: b. the complaint stage; c. the complaint definition; d. the decision on the complaint; e. the reasons for any decisions made; f. the details of any remedy offered to put things right; g. details of any outstanding actions; and h. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Complete	QUALITY ASSURANCE assurance workplan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group	
42.	Corrective Action	2024 Self-Assessment	Housing Lead	7.1 Where something has gone wrong a landlord must	Complete	<u>Complete</u>	

				acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing, procedures or practices.		The Redress Policy has been published and implemented following approval by Cabinet The Complaints Quality Assurance workplan is now in place and being monitored by the Tenant Complaints Focus Group and the Council Officer Complaints Task and Finish Group	
43.	Complaints Self-Assessment and Review		Housing Lead	8.1 Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's	Dec 25	<u>Complete</u> 8.1b: The Council can identify complaints that have not been investigated by running a report on the following status's withdrawn, existing complaint, logged in error and sign posted to relevant service. For withdrawn complaint the Council adds the reason for withdrawal so could run text analysis to categorise the reasons A Complaints Self-Assessment has been carried out for 2025 in conjunction with the Tenant Representatives and in consideration of feedback with the ombudsman, and audit. <u>In Progress</u> Refused complaints will be added to the Complaints Data Dashboard to ensure they are monitored moving forward.	

				performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
44.	Self-Assessment Reporting	2024 Self-Assessment	Housing Lead	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.	Complete	<u>Complete</u> Annual complaints reporting to tenant representative group and housing boards well established. <u>In Progress</u> There are regular updates throughout the year on complaints as part of the performance reports, Tenant Satisfaction Measures result and transformation plan work. A Mid-Year Report on Complaints was presented in June 2025 to the Tenant Representative group (Agenda for Housing Advisory Panel on Tuesday, 17th June, 2025, 2.00 pm). A second report will be presented to the Housing Advisory Panel in September 2025. The minutes from this meeting will be published online via the Council's website.	
45.	Positive Complaints Culture, Accountability, Transparency and Improvements	2024 Self Assessment	Housing Lead	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. 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. 9.3 Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from	Complete	<u>Complete</u> QUALITY ASSURANCE workplan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group	

				complaints to stakeholders, such as residents' panels, staff and relevant committees.			
46.	Member Responsible for Complaints	2025 Self-Assessment	Programme Manager	9.5 In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	October 2025	<u>In Progress</u> A Member Responsible for Complaints has been appointed, this just needs to be publicised on the Council's Website	
47.	Complaints Reporting	2025 Self-Assessment	Housing Lead	9.7 As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	December 2025	<u>In Progress</u> Work being carried out to review and update complaints performance reporting to relevant governing bodies. Complaints Data Dashboard developed to assist with reporting	
48.	Standard Objective for Complaints Handling	2024 Self-Assessment	Housing Lead / Tenant Voice and Customer Experience Manger	9.8 Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through	September 2025	<u>Complete</u> There is only one complaints policy in operation for the whole Council. <u>In Progress</u> Wider Housing Training plan developed and rolled out. Specific Complaints Handling training has been completed by members of staff via the HQN. A train the train the trainer programme is being developed to ensure further roll-out.	

				complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			
49.	Ombudsman Policy Review	2025 Complaints Self-Assessment	Customer Experience and Support Service Manager / Housing Lead / Complaints (Audit) Officer	Review and update the Complaints Policy based on the recommendations outlines by the Housing Ombudsman's recommendations following the 2024 Self-Assessment. 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. 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. 2.2 A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal	October 2025	Policy update being undertaken to implement the following recommendations. 1.3: The landlord should review its complaint policy and include the requirement that a resident does not have to use the word 'complaint' for it to be treated as such. The landlord should review its complaint policy and include the requirement that it will give any residents that express dissatisfaction a choice to make a complaint. The landlord should amend pages 7 and 9 of the policy to ensure the wording is consistent with residents having a choice to make a complaint. 1.5: The landlord should review its complaint policy and clarify that it will raise a complaint if the resident expresses dissatisfaction with the response to their service request. The landlord should review its complaint policy and include the requirement that a complaint will not prevent / stall or impact on actions needed to resolve any immediate issues (i.e. the service request). 2.2: A first request for service The landlord should amend this exclusion on its complaint policy, so that it is clear that the landlord will consider complaints about the handling of service requests or ASB reports. A query about service provision The landlord should amend this exclusion on its complaint policy, so that it is clear that the landlord will consider complaints about the handling of service queries under its complaint process. A query about progress of a specific issue The landlord should amend this exclusion on its complaint policy, so that it is clear that the landlord will consider complaints about the handling of progress updates for a specific issue. Complaints where legal proceedings have started, or court or tribunal action is being taken The landlord should review this exclusion and remove the part where it says "or court or tribunal action is being taken". A request for enforcement action by the council. e.g. noise nuisance The landlord should amend this exclusion on its complaint policy, so that it is clear that the landlord will consider complaints about the handling of enforcement action requests (e.g. noise and nuisance).	

			proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. · Matters that have previously been considered under the complaints policy. 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. 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. 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	Where no outcome has been specified or where the outcome is considered too unreasonable The landlord should remove this exclusion from its complaint policy. An appeal of a decision where there is no fault in the way the decision has been made The landlord should amend this exclusion on its complaint policy, so that it is clear that the landlord will consider appeal decisions relating to housing services where there is no other specific procedures set by law (i.e. appeal decisions that are suitable for the court or tribunal). This recommendation is also consistent with page 5 of the landlord's complaint policy, where it mentions complaints that are suitable for other procedures set by law. Insurance Claims or Proceedings The landlord should review this provision and make clear that although the landlord will not consider matters where a claim has been filed with an insurance company, the landlord will look at the handling of the resident's request to make an insurance claim, the wider circumstances that led to the claim, or where the landlord is adjudicating on the claim itself. The legal process is separate to this, and the landlord should only exclude complaints where legal proceedings have started as explained above. 2.3: The landlord should review page 4 of its complaint policy and include the requirement that it will accept complaints referred to it within 12 months of the resident being made aware of the issue, or the issue occurring. This should be consistent with the timeframe set out in page 8 of the landlord's complaint policy. 2.4: The landlord should review its complaint policy and make clear that it will explain to the resident that they have the right to take the landlord's decision to the Ombudsman, when it decides not to accept a complaint. 3.4: The landlord should review its complaint policy and include the requirement that it will consider residents requests to make its complaint policy available in an accessible format. 5.2 and 5.3 The landlord should review page 6 of its complaint policy and make clear that if a complaint is received regarding a third party acting on its behalf, the complaint will be investigated in line with the two stage complaint process set by the Code. 5.6 and 5.7 The landlord should review page 8 of its complaint policy and include the following requirements in the landlord's stage 1 acknowledgement and stage 2 escalations acknowledgement:	
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			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. 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. 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. 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. 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. 6.5		- The outcomes the resident is seeking - Which aspects of the complaint the landlord is and is not responsible for. 5.9 The landlord should review its complaint policy and include the requirement, that it will agree with the resident, suitable intervals for being updated on their complaint, when the landlord's response falls outside of the extended timescales set out in the Code. 6.5 The landlord should review page 13 of its complaint policy and remove the fax number listed for the Housing Ombudsman. 6.6 The landlord should review its complaint policy and include the requirement that the landlord will provide the stage 1 response to the resident when the answer is known, not when all outstanding actions are completed, and updates will be provided to the resident on outstanding actions. These can be a specific reference to stage 1 responses or a statement covering both stage 1 and stage 2 responses. 6.11 The landlord should review page 8 of its complaint policy and make clear that stage 2 complaints will be acknowledged, defined and logged within 5 working days of the escalation request being received. 6.12 The landlord should review page 10 of its complaint policy and remove the part where it says "explaining why you want to go to Stage 2". As residents are not required to provide reasons for requesting their complaint to be escalated to stage 2. 6.17 The landlord should review its policy and include the requirement that the landlord will provide the stage 2 response to the resident when the answer is known, not when all outstanding actions are completed, and updates will be provided to the resident on outstanding actions. These can be a specific reference to stage 2 responses or a statement covering both stage 1 and stage 2 responses (as recommended at provision 6.6 of the Code).	
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			When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. 6.6 A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. 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. 6.12 Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. 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.			
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Appendix C: Governance and Scrutiny

Being Accountable

As part of our commitment to being transparent and ensuring we are accountable to our tenants, the annual complaints self-assessment has been scrutinised by tenants and our governing bodies. It has been reported to:

Tenant Complaints Focus Group	August 14 th 2025
Housing Complaints Task and Finish Group	July, August, September 2025
Housing Advisory Panel	September 9 th 2025
Internal Audit	September 2025
Housing Business Board	Pending: October 2025

Housing Advisory Panel Minutes available here: [Agenda for Housing Advisory Panel on Tuesday, 9th September, 2025, 2.00 pm](#)