# Appendix A: Self-assessment form

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

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

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

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

# Section 1: Definition of a complaint

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 1.2 | A complaint must be defined as:  *‘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.’* | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | Our complaint policy was updated in September 2022. The updated definition is as follows: 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 or group  This is outlined in Customer complaint training available to all staff. The whole council follows this definition as standard. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | We do not insist on tenants using the word complaint for a matter to be handled as a complaint and this is covered within our policy. "We do not insist on residents using the word complaint for a matter to be handled as a complaint and this is covered within our policy. "All customer complaints and compliments will be treated equally regardless of the method they are submitted, and customers do not have to use the word complaint for it to be treated as such." Any complaint submitted via a third party will be handled in line with our complaints policy and is stated within the policy. If a level of dissatisfaction is stated in any communication, it is logged as a complaint to ensure that the dissatisfaction is resolved, and the complainant receives a formal response to ensure closure to the situation reported.  This is outlined in Customer complaint training available to all staff.  It has been highlighted to new contractors as well. |
| 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 <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | This is outlined in our complaints policy ‘A request for information about us or the services that we offer. Service requests or a request or demand to access services we provide’.  Our website [www.medway.gov.uk/yourfeedback](http://www.medway.gov.uk/yourfeedback) explains that if we feel we can resolve an issue, this will be dealt with as a service request. We are developing a new policy which will offer more explanation around service requests. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Our complaints policy defines a service request. Where there is then a repeated request for a service or where a resident raises dissatisfaction with the response to their service request then this would be raised as a complaint. If no dissatisfaction is stated, then we will keep the enquiry at a service request stage. These are still tracked within the complaints & enquiries process.  Complaints are raised upon receipt and will be investigated alongside substantive actions. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | If at any stage during the service request process, a level of dissatisfaction is noted, we will escalate the enquiry into the complaints process.  The Tenancy Team carry out ‘Big Door Knock’ monthly surveys. Any complaints are followed up and the officers advise residents how to make a complaint if dissatisfied. We highlight the complaints process within those visits. |

# Section 2: Exclusions

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| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Communication templates | The Housing complaints policy states that ‘Housing Services shall accept a complaint unless there is a valid reason not to do so’.  ‘Where Housing Services decides not to escalate a complaint, we will provide an explanation to the resident. It should make clear that its previous response was its final response to the complaint and provide information on referral to the Housing Ombudsman’.  Where a complaint is refused, the council writes to the complainant explaining its reasons and signposting the complainant to the relevant Ombudsman. |
| 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. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | Where the council does not accept a complaint, the customer will be provided with an explanation and of their right to take the decision to the Ombudsman. This is detailed within our complaints policy. In addition to this being stated within our policy, we also advise throughout the complaint process that a complainant can contact the Housing Ombudsman at any time within the complaints process to ensure full transparency and compliance with our own Complaints Policy and the Housing Ombudsman’s Complaint Handling Code  Currently, information about Medway Council’s complaints procedure is here: [www.medway.gov.uk/yourfeedback](http://www.medway.gov.uk/yourfeedback)  We are developing a new policy which will offer more information of what we cannot consider under our complaints process. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Complaints will be assessed on an individual basis and discretion applied for complaints outside of  the 12 months. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | Where the council does not accept a complaint the customer will be provided with an explanation and of their right to take the decision to the Ombudsman. This is detailed within our complaints policy. In addition to this being stated within our policy, we also advise throughout the complaint process that a complainant can contact the Housing Ombudsman at any time within the complaints process to ensure full transparency and compliance with our own Complaints Policy and the Housing Ombudsman’s Complaint Handling Code.. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure | Each complaint is considered individually. Our CRT team receive formal complaints and will then pass these over to the relevant service areas. Within each service area there are officers who will respond to complaints. There is an officer who tracks complaints to ensure they are given the necessary attention and responded to in the timescales prescribed. To ensure ongoing compliance with the complaint handling code requirements and adherence to our policy. |

# Section 3: Accessibility and Awareness

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| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. * Complaints procedure   We recently updated our online form to invite complainants to tell us if they have a disability, and if they need us to deal with them differently[www.medway.gov.uk/yourfeedback](http://www.medway.gov.uk/yourfeedback) | Our complaints policy makes clear the different channels residents can complain by. Either by phone, e-mail, online form, in person or in writing. In addition to the policy stating the channels of communication, the housing complaints inbox has now been set-up and all staff are aware of its existence. Complaints are monitored via a tracking system to monitor complaint progression.  Translation and  interpretation services are  available with website being  enabled with accessibility  software |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Mandatory complaints training | The complaint process is outlined in our Customer Complaint Training. The complaints procedure outlines the appropriate process for recording and escalating complaints to the Complaints Team.  A template has been developed for contractors and Housing staff to standardise our process. |
| 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 | * Performance Information <https://www.medway.gov.uk/housingperformance> | In March 2023 we set up a process for measuring satisfaction with complaint handling via transactional surveys that are sent out upon closure of a Complaint, which include a QR code to make this as accessible as possible. Complaints Performance is reported monthly and monitored by our tenant and leaseholder panel and HRA Governance Group on a quarterly basis. We welcome all complaints and take the opportunity to apply the learning that results from feedback. Performance Information is published to tenants in the Housing Matters newsletter, vie the Housing Services Facebook page. |
| 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 | * Information about Medway Council’s complaints process is here: [www.medway.gov.uk/yourfeedback](http://www.medway.gov.uk/yourfeedback) * Complaints policy * [https://www.medway.gov.uk/medway\_council\_housing\_complaints\_policy](https://www.medway.gov.uk/medway_council_housing_complaints_policy" \o "Housing Complaints Policy) | Our complaints policy is available on our website and is available in a clear and accessible format. The council’s website includes information on complaints 2 stage process and the right to access the Housing Ombudsman Service, not only when the councils complaints process has been exhausted.  Information about Medway Council’s complaints process is here: [www.medway.gov.uk/yourfeedback](http://www.medway.gov.uk/yourfeedback)  We are developing a new policy which will offer more detailed information and anticipate that this will be on the council’s website later this year. |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code. | Yes |  | Housing Services has published. There will be a corporate focus on LCGO and Ombudsman later in the year. |
| 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 | * Our privacy policy outlines how we use your data while investigating your complaint. <https://www.medway.gov.uk/complain> * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Our complaints process provides information for tenants to have a representative deal with the complaint on their behalf. Tenants are advised that any stage of the complaints process they can contact their local councillor or use another person or organisation to contact the council on their behalf (such as an MP or a community group).  We advise that we may need to contact complainant to ask for consent to investigate your complaint.  Our procedure allows people to make a complaint on behalf of the complainant. We will reply to the representative with the complainant’s consent. |
| 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 | * Our privacy policy outlines how we use your data while investigating your complaint. <https://www.medway.gov.uk/complain> * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Residents are advised about the complaints process, Housing Ombudsman scheme and complaint handling code through various channels, including the website, in correspondence and in our newsletter. In addition, as we work through the complaints process with any complainant, they are advised that they can approach the Housing Ombudsman at any time throughout the complaints process.  This information is provided on our website as well as in our final response, when we refuse a complaint, where there are delays or where the council must apply its Persistent Complainer’s Policy. |

# Section 4: Complaint Handling Staff

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| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Our Customer Relations team receive formal complaints and will then pass these. There is an officer who tracks complaints to ensure they are given the necessary attention and responded to in the timescales prescribed and to ensure a single point of responsibility wherever possible. This ensures a consistency of complaint coordination and decision making, and each complaint is followed through to resolution. To ensure continued compliance with the complaint handling code training has been provided to staff on the complaints policy and a process implemented in housing to ensure it is consistently applied. A Housing Ombudsman Task Group has been established to ensure the code is applied consistently across the HRA. Several officers monitor the housing complaints inbox to ensure that it is constantly monitored.  Medway Council has a dedicated Customer Relations Team who oversee the handling of complaints. This team includes the Ombudsman’s link officer, responsible for liaising with the Ombudsman, and the manager is responsible for analysing and reporting complaints data to a range of audiences. |
| 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 | * Complaints procedure and flow chart | Our Complaint Team have  access to designated  colleagues within service  areas, they have access to  quick resolution and are  empowered to exercise  autonomy and authority. |
| 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 | * Training records | A consistent process for tracking and collating data from complaints is consistently improving. Wider learning and improvement from complaints is reported via the annual report and in our tenant newsletter. Learning from complaints is also shared with our tenant and leaseholder panel. Complaints are also discussed as part of the Quality Management Process and form part of our ‘Test and Review’ process.  Medway Council takes complaints seriously and deals with them as a priority. Complaints management and performance is closely scrutinised by senior leadership. All relevant staff receive relevant and refresher training to deal with complaints. |

# Section 5: The Complaint Handling Process

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>  ’ | The policy states that ‘complaints will be resolved promptly, professionally, and fairly.  Medway Council welcomes complaints. Those who receive a service from Medway Council are treated fairly. |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion. | Yes | * The Housing Complaints Policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We operate a 2-stage complaint process and aim to resolve issues at the earliest possible opportunity. The complaints policy provides details of the Housing Ombudman. |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | * Complaints Policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We operate a 2 stage complaint process and signpost complainants to the Ombudsman when we have competed our investigation. |
| 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. | Yes | * Complaints Policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | The Complaint Team co  ordinate a response to a  customer and would liaise  with any third party to  provide a response in  accordance with our  complaints process. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | * Complaints Policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>. | See above |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure and flow chart | A summary is provided.  within the acknowledgement template. We also ask the  complainant to explain their reason for escalating their  complaint using questions.  If this is not clear, contact  will be made to establish  and clarify this information. |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure and flow chart | If an element of the  complaint is not to be  progress or accepted in its  entirety in both instances,  reference will be made to  the reasons why or the  exclusions highlighted  within the Complaints and  Compliments Policy and  procedure, this will be  confirmed in communication  to complainant along with  their right to approach the  Housing Ombudsman.  Contact details for the  Ombudsman are provided  in complaint outcome  responses. |
| 5.8 | At each stage of the complaints process, complaint handlers must:   1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived conflict of interest; and 4. consider all relevant information and evidence carefully. | Yes | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Training Matrix | Medway Council’s staff who respond to complaints have all attended complaints training. |
| 5.9 | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure and flow chart | If we need more time, we  will agree this with the  customer and confirm the  extension in writing. We use  a complainant’s preferred  method of communication  during the investigation of  their complaint.  We share when and how  we will communicate with  them and, when asked, we  will adapt. |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | Yes | * Equality Policy. <https://www.medway.gov.uk/downloads/download/133/equality_policy> * Training Matrix | We will make reasonable adjustments when requested to do so, and through our duty to anticipate the needs of our customers. We invite customer to tell us if they have a disability when making a complaint and tell us how they would like us to deal with them differently. |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Requests to escalate to stage 2 are only rejected if there is a valid reason to do so. We explain our reason to the complainant and provide them with the relevant Ombudsman’s details. |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | Yes | * JADU System * Complaints Tracker | All information relating to the complaint is maintained in line with GDPR retention periods. Information is stored in the JADU system and on the complaints tracker. |
| 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 |  | We encourage early resolution to fully resolve the complaint issues, including the use of financial remedies to recognise injustice where a more meaningful remedy cannot be applied.  Housing follow a Redress policy, as per 5.1. |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure and flow chart | Medway Council uses its own Persistent Complainer Policy for managing unreasonable behaviour through the complaints process, including keeping restrictions under review.  The Housing Complaints policy – section 5.10 refers to how we will manage a complainant or  complaint that fall within the  remit of unacceptable  behaviour. |
| 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 |  | See 5.14 |

# Section 6: Complaints Stages

Stage 1

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| 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 | * Performance Information <https://www.medway.gov.uk/housingperformance> * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We follow the council’s corporate complaints process and will always endeavour to get a response out within our timescales |
| 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**. | Yes | * Performance Information <https://www.medway.gov.uk/housingperformance> * Complaints Policy * <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> | We monitor our  performance in this area on a monthly basis and as part of our Tenant Satisfaction  Measures.  We have recently updated our processes and systems to reflect the change to the 5 working day acknowledgement period. |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | Yes | As per point 6.1   * Tenant Satisfaction Measures: <https://www.medway.gov.uk/housingperformance> & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> * Customer commitments: <https://www.medway.gov.uk/tenantcommitments>. * Performance Information <https://www.medway.gov.uk/housingperformance> | We monitor our  performance in this area on a monthly basis and as part of our Tenant Satisfaction  Measures.  Performance in responding to complaints is monitored closely, and reports are produced on a monthly, quarterly and annual basis. |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure and flow chart | Housing will only extend our response time if we feel it is needed. Cases are only extended if it is a complex case and requires the attention of several officers.  If an extension is required,  we will explain the  reason(s) why we need  more time, we will agree  this with the customer and  confirm the extension in  writing. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | Details of the Housing Ombudsman are provided in the holding letter. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | We will always provide a response when we know the answer to the complaint. If a site visit needs to take place in order to provide a full response, we will let the resident know. Any outstanding actions will be followed up by the Housing Team. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Responses are quality checked by the Customer Relations Team, and referred back to the investigator if it is felt that further information is needed.  Response templates prompt and provide guidance to ensure all points raised are responded to and the rationale for all decisions are presented. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | Residents can do this by contacting The Customer Relations Team and this will be added onto their current complaint. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | • Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>  • Complaints procedure and flow chart  • Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures>  • Performance Information <https://www.medway.gov.uk/housingperformance> | * 1. Our responses template states what stage the complaint has been investigated, and b) we encourage complaint handlers (through training and CHG) to summarise the complaint followed by our response. We also aim to quality check this when we approve responses. We clearly set our decision at the end of our complaint response   2. As well as why we have decided this   3. And the remedies offered   4. Outstanding actions are listed and we state how the resident will be contacted to update them on these actions, as well as timescales (if we can) |

Stage 2

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| --- | --- | --- | --- | --- |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | Our response at stage 1 clearly sets out how customers can escalate their complaint to stage 2. |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | We have recently updated our processes and systems to reflect the change to the 5 working day acknowledgement period. |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | We will accept most requests for escalation and aim to seek further information where we feel it will help us to investigate the issues further. Also, see 5.11 |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | Housing have a process where different Managers and Seniors are involved at different stages of the complaints process. |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy>  • Complaints procedure and flow chart  • Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures>  • Performance Information <https://www.medway.gov.uk/housingperformance> | Our Complaints  policy,  advises we will  respond in 20 working days.  Performance in this area is  monitored and reported  monthly and through TSM’s. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | An extension is only considered when the case is complex. I.e. involves several officers or requires a site visit before a response can be given. |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure | Our ‘holding letter’ includes the relevant Ombudsman’s details. |
| 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 | * Complaints policy   <https://www.medway.gov.uk/medway_council_housing_complaints_policy>   * Complaints procedure | Within our policy and  procedure, updates and  substantive responses will be provided as soon as the result is known. Contact will be maintained with the  customer until all  outstanding actions are  complete. |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart * Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> * Performance Information <https://www.medway.gov.uk/housingperformance> | a. Our responses template states what stage the complaint has been investigated, and b) we encourage complaint handlers (through training and CHG) to summarise the complaint followed by our response. We also aim to quality check this when we approve responses. We clearly set our decision at the end of our complaint response.  b. As well as why we have decided this  c. And the remedies offered  d. Outstanding actions are listed and we state how the resident will be contacted to update them on these actions, as well as timescales (if we can) |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart * Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> * Performance Information <https://www.medway.gov.uk/housingperformance> | a. Our responses template states what stage the complaint has been investigated, and b) we encourage complaint handlers (through training and CHG) to summarise the complaint followed by our response. We also aim to quality check this when we approve responses. We clearly set our decision at the end of our complaint response.  b. As well as why we have decided this  c. And the remedies offered  d. Outstanding actions are listed and we state how the resident will be contacted to update them on these actions, as well as timescales (if we can) |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | Medway only has two stages of the complaint process.  Response at Stage 2  clearly states this is our  final response and will  involve all relevant staff to provide this. |

# 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 policies, procedures or practices. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | We explain within our responses what we feel the complaint points are, answer them individually and apologising where appropriate, as well as following our own Complaints Redress Policy where appropriate. If we are at fault a suitable remedy is answered.  We will also amend our policies and provide training if it is needed.  The importance or through investigations and high quality responses is also supported and encourage through Customer Complaint training and Complaint Handlers Group. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Complaints procedure and flow chart | This will be considered at  Stage 1 and Stage 2  response as appropriate  We have a Complaints Redress Policy that we use for all complaint remedies |
| 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 | * Complaints Template | If upheld, we offer a financial remedy straight away (if appropriate and in line with our Policy).  If the remedy is repair works, we aim to give timescales as well as our team keep in contact with the resident to keep them updated. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We have used the Ombudsman’s guidance to shape our own Policy. |

# 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:   1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 2. 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; 3. any findings of non-compliance with this Code by the Ombudsman; 4. the service improvements made as a result of the learning from complaints; 5. any annual report about the landlord’s performance from the Ombudsman; and 6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | Ombudsman Self  Assessment – against the  Complaint Handling Code  b) Performance information – Qualitative &  quantitative  c) Determinations from  Ombudsman where  appropriate  d) Service improvements  from learnings  e) Annual Report from  Housing Ombudsman – if  5 or more determinations  for 2023/24  f) Any reports / publications  from Ombudsman | This self assessment will be published on our website. We also produce an annual report  This is completed by our Housing Team  Not applicable  We are continuously making improvements from our complaints  We learn from the Ombudsman’s reports and share them within Housing  The Customer Relations Manager currently produces an annual compliment and complaints report which is shared and discussed with senior managers and leaders.  In line with the publication of the new Code, improvements are being made to this report to meet all the requirements set out in 8.1 |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this. | Yes | * Ombudsman Self   Assessment  • Website – Complaints and  Compliment section  • Annual Complaints  performance  • Service improvement  report. | The Ombudsman Self  assessment has been  published on the website within  the Complaints and  Compliments – Self  Assessment section. Along  with the Annual complaints  performance and service  improvement |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | Self Assessment is checked by our Chief Housing Officer. However, all complaint handlers are trained to this self-assessment |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We will review as per  guidance |
| 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 | • Business Continuity Plans | We will comply with the  code unless exceptional  circumstances prevent us  from doing so, where  business continuity plans  will be put into operation for  a return to business as  usual, as soon as possible. |

# 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> * Quality Service Manual | We use complaints to  identify themes and trends  to provide a broader picture  for service improvement  learning and opportunities |
| 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 | * Complaints policy <https://www.medway.gov.uk/medway_council_housing_complaints_policy> | We welcome complaints and learn from them through reporting. |
| 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 | Publishing learning from complaints to support | In the process of developing system to publish learnings on our  website and intranet in our  Tenants Annual Review.  Provide updates to scrutiny panel. You Said, We Did updates reported to tenants in newsletter. |
| 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 | * Housing Service Structure | The complaints team sits  within the Strategy Team. The Senior Management Team and Chief Housing Officer analyse complaint responses. Complaint Performance is reported quartey to the HRA Governance Board |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (‘the MRC’). | Yes | * Council Cabinet Structure | Councillor VanDyke – portfolio holder for Business Support is appointed lead.  . |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord’s complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes | * Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> * Performance Information <https://www.medway.gov.uk/housingperformance> | The portfolio holder is regularly brief on complaints performance by the Customer Relations Manager and the Head of Customer Experience |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:   1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 2. regular reviews of issues and trends arising from complaint handling;regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; andannual complaints performance and service improvement report. | Yes | * Tenant Satisfaction Measures: https://www.medway.gov.uk/housingperformance & <https://www.medway.gov.uk/info/200152/council_tenants/1819/tenant_satisfaction_measures> * Performance Information <https://www.medway.gov.uk/housingperformance> | The portfolio holder is regularly brief on complaints performance such as  Statistical data on  complaints  • Details of all cases  investigated by the  Ombudsman.    • Audit or risk activity  relating to the  complaints service.  • An update on  initiatives and  progress    • Annual Self  assessment against  the Complaint  Handling Code |
| 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:   1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 3. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | * Complaints Training | The Housing Department have had the same training in order to deliver the same service and are working towards the same objectives |

Complaints and Service Improvements

Annual report 2023-24

# Introduction

The Complaint Handling Code became statutory on 1 April 2024, meaning that as a landlord, we are obliged by law to follow its requirements.

By working in line with the Code, HRA Housing Team aims to achieve best practice in complaint handling and to use this to drive improvements across the services that we deliver to our tenants and leaseholders.

The purpose of the report is to provide assurance that HRA Housing Services are managing its formal complaints in accordance with the Housing Ombudsman Complaint Handling code and the Council’s complaints policy and procedure.

Complaints received provide much learning for the Housing Service on where and how we need to improve. The themes and trends identified from complaints in 2023/2024, highlight the need to improve communication and information provided to tenants and improve communication and information about complaint resolution.

# HRA Governance Group

The HRA Governance Group meets quarterly and performance information relating to complaints is a standing agenda item. The Governance Group consists of the Senior Management Team, the Portfolio Holder for Housing, Councillors and HRA Tenant representatives. Updates are also regularly given on tenant surveys, complaints improvement plan and trend analysis carried out on complaints.

# Tenant Panel

Our performance information is routinely scrutinised and challenged by residents through our Tenant and Leasehold Panel and by senior management and key stakeholders that sit on the HRA Governance Group.

Working with residents on the panel we seek to ensure that the HRA Complaints process:

* Demonstrate a clear commitment to resident governance to drive further improvements.
* Has a clear Complaints policy and process that is easily accessible.
* All HRA staff take ownership of the complaints process and are supported through regular training.
* That reasonable adjustments are made in our complaint responses, and that we proactively react, respond and record communications with our tenants.
* We actively risk manage front line complaints to identify any tenant vulnerabilities or risk of harm.
* Performance Monitoring are in place to ensure that risk assessments are carried out for ASB cases.
* Proactive management of our contractors to resolve and rectify areas of poor service.

How we collect and use your feedback:

# Performance

During the year 2023/24, the HRA complaint teams received 84 complaints. With 71 complaints resolved at stage 1 and 13 complaints escalating to stage 2. During the period, 1 complaint was investigated by the Housing Ombudsman.

Number of stage one complaints made by tenancy in the relevant stock type during the reporting year per 1,000 homes – 23.4

Number of stage two complaints made by tenancy in the relevant stock type during the reporting year per 1,000 homes – 4.2

For the whole year 76.1% of stage 1 complaints were responded to on time against a target of 75% and 100% of stage 2 complaints were responded

to on time.

The percentage of complaints escalated to stage 2 in 2023/2024 was 18.3%. This is a snapshot for the reporting year, it should be noted that there can often be a period in between the stage one complaint response and any escalation.

# Service Improvements

We understand that sometimes things do go wrong and it is important to us to learn from this.

Things we have put in place following complaints to us:

* Increased signage in blocks to ensure your health and safety;
* Adjusted the trades times on some door entry systems to reduce the potential for ASB

Using feedback from customer perception surveys we have also devised a complaints improvement plan to ensure that:

* Making a complaint is easy;
* Contact details are easy to find and regularly published to customers;
* Key staff receive annual training for dealing with and responding to complaints;
* We have a proactive approach to supporting customers through increased drop in surgeries, events and monthly area door knocks.

What we will continue to work on

* Reduce the financial impact of complaints by getting things right first time more often.
* Training staff to empowered and have the time to respond positively to customer complaints
* Showcase good practice and share more widely the learning from complaints.

Looking Forward

The Council have implemented a complaints satisfaction survey [Complaints Learning](https://www.medway.gov.uk/ComplaintsLearning) with a view to increasing our feedback to facilitate further improvement where indicated.

A complaints action plan has been developed to monitor and improve our complaint process. This focuses on the key areas of

* Embedding the new Housing Ombudsman Complaints Handling Code
* Learning from complaints
* Communicating and working with tenants to improve the complaints process.
* Working in partnership with our contractors to embed service standards.
* Provide complaints training to all staff.

# Self-assessment

Our self-assessment has been written alongside this annual report and has been published on our website here: [Housing ombudsman self assessment 2024](https://www.medway.gov.uk/downloads/file/8751/housing_ombudsman_assessment_2024)

HRA Governance Group and Tenant Panel Response:

The HRA Governance Group recognise the importance of reviewing information about HRA complaints performance and to hear directly from tenants through quarterly reports and updates from tenant representatives who are active members of the Governance Group.

 The Tenant Panel and Governance Group have reviewed the annual complaints performance report and self-assessment (against the Housing Ombudsman complaints handling code).

 During the year 2023/24, the HRA complaint teams received 84 complaints. With 71 complaints resolved at stage 1 and 13 complaints escalating to stage 2. During the period, 1 complaint was investigated by the Housing Ombudsman. We recognise that this is a significant number but are proactively seeking to engage with tenants to advise of the complaints process and identify barriers to communicating dissatisfaction.

During the course of this year, there has been a lot of activity undertaken to ensure that we continuously improve services to tenants and to hear the voice of customers. This has been done through:

* monthly Big Door Knock events to survey tenant satisfaction
* Housing Ombudsman Working Group
* Regular Complaints meetings
* Learning from complaints embedded in operational service delivery
* The introduction of tenant committees with a focus on learning from complaints (due autumn 2024)
* The appointment of a complaint representative from the scrutiny panel
* Introduced a complaint survey following complaint resolution to identify areas for service improvement
* Developed a complaint action plan
* Complaints are a key performance indicator that we monitor to ensure that the voice of the tenant is listened to and acted on to continuously improve.