

## Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

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

### Section 1 - Definition of a complaint

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents</i>	Yes	The Council's <a href="#">complaints policy</a> is in place for all council services including Housing, and includes this exact definition
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Staff are aware that where a customer raises an issue as defined in 1.2, this is logged as a complaint. Where a third party raises a complaint on behalf of a customer, we will log this as a complaint. If we don't have permission/advocacy in place to deal with that third party, we will ask for advocacy to be put in place, or address the response to the customer
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint	Yes	This is outlined within the complaints policy. An assessment is made of service requests and complaints logged where requested/appropriate.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Reasons for exclusions are detailed within the complaints policy. Our policy states "Not all complaints are be dealt with under this policy. (See Appendix 2). If a formal appeal process exists, then this will be used to address your concerns. Appeals processes exist for several areas including school admissions, benefit

			claims and planning applications. To ensure you are using the correct route for the issues you are raising, please see Appendix 2 for guidance on what we cannot deal with”
<b>1.8</b>	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	<p>If an appeals procedure applies to a complaint, we will tell customers this and signpost them to the relevant appeals process.</p> <p>The following are examples of where an appeals process is in place:</p> <ul style="list-style-type: none"> <li>- A re-housing decision</li> <li>- An eviction decision</li> <li>- An offer of council accommodation; or</li> <li>- Entitlement to Housing Benefit or Universal Credit.</li> </ul> <p>Additional reasons include where a complaint should be dealt with through a legal recourse, where a complaint is outside reasonable timescales (generally 12 months but exceptions can be applied where necessary), and where a complaint has already been responded to.</p> <p>Exclusions support and protect tenants and customers, in that the separate appeals processes are in place to ensure the council’s decision making is in line with statutory duties. The review panels themselves are also independent to the service managing the function and include giving further support and advice to customers, such as signposting independent legal advice.</p>
<b>1.9</b>	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	We will inform the customer of the reason why we’re unable to investigate and signpost to the relevant appeals process (if applicable) and to the HOS

## Best practice 'should' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary, and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	An assessment is made of service requests and complaints logged where requested/appropriate
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Our quarterly overall tenant satisfaction surveys (the main survey programme we have in use) make this clear to residents and signposts to how to log a complaint. During 2024, the service will be reviewing our approach to satisfaction surveys and, where possible, will take this into account

## Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>Yes, customers can raise a compliment or complaint by:</p> <ul style="list-style-type: none"> <li>• Completing an <a href="#">online form</a></li> <li>• Calling 0113 222 4405 (the dedicated Customer Relations line) or 0800 188 4000 (Contact Centre) or any local Housing team</li> <li>• Emailing <a href="mailto:complaints@leeds.gov.uk">complaints@leeds.gov.uk</a></li> <li>• In writing or in person to any of our <a href="#">local community hubs or housing teams</a></li> </ul> <p>During any enquiry (email, telephone, or in person), if a customer expresses a wish to complain, we will direct or transfer the customer to the Customer Relations Team. We can also take the complaint on the customer's behalf and send this to the Customer Relations Team to log and allocate for investigation.</p>

2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our complaints policy is included on <a href="#">the 'complaints, compliments and feedback'</a> page of our website. This describes the different ways customers can make a complaint, the stages involved, and what happens next. A printed copy of the policy can be provided on request. The website version is accessible for screen-readers and other supportive technology such as translation tools.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	As above, this is clearly set out and accessible on the Leeds City Council website
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>Our policy states that “We are committed to understanding the impact of a complaint on a customer, taking their individual circumstances into account. To assist in this, where reasonable adjustments are required concerning how complaints are made, considered, or responded to, we aim to accommodate requests where possible. We encourage in the first instance to discuss any reasonable adjustments with the Customer Relations team (0113 2224405, <a href="mailto:csu.customer.relations@leeds.gov.uk">csu.customer.relations@leeds.gov.uk</a>)”</p> <p>Additionally, our in-house Customer Care training and Investigating Officer training reminds staff about the different considerations/needs of our customers.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>Where a customer is dissatisfied with a service, we will make them aware of the complaints procedure and we regularly ask for feedback on our services.</p> <p>We actively promote key information to residents on how to contact us via a network of local housing teams and community hubs, website content, and by using our contact centre. Our focus is on making all our services as accessible as possible and dealing and responding to service requests at first point of contact.</p>

			<p>This information is shared via the monthly tenant email, social media, and through the website. For those customers who aren't online, we make sure that communication clearly signposts the HOS at the beginning of the process</p> <p>We include information on the Housing Ombudsman, and the Complaint Handling Code on the complaints, compliments, and feedback page of our website.</p> <p>During 2023 we have included information about how residents can complain in the <a href="#">annual building safety newsletter</a> (hard copy to all high-rise residents). We include this information and information about the Housing Ombudsman and the Code and in our <a href="#">regular e-bulletins</a>.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	As above, information is regularly shared with customers. As new communications are developed, we will seek to strengthen this.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Our acknowledgement templates make customers aware at the beginning of the process how to contact the HOS

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	If we receive complaints in a public forum, we invite the customer to speak to us in private to address any complaints. This is then processed through the correct channels. Our policy states "Where complaints are received through Social Media, we will encourage a complainant to provide details through direct messages to maintain confidentiality. This may then include giving to customers a link to the online complaints reporting form so that all customers can describe the nature of their complaint and

			submit this to the customer relations team directly”
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### Section 3 - Complaint handling personnel

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes	<p>The Council has a central Customer Relations Team who are responsible for complaints administration and ensuring that complaints are allocated to appropriate named Investigating Officers and the customer is informed by way of an acknowledgement. The Customer Relations team also collate and share management information with the housing service leadership team. During 2023 we set up the new Leeds Housing Board. Complaints performance and compliance with the Code is reviewed regularly at the Board meetings.</p> <p>Additionally, we have an ‘intervention team’ which works directly in the repairs service and looks to provide early resolution to complaints where possible.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>The Customer Relations Team sit under a different directorate to Housing Leeds. They ensure that we adopt a ‘one council’ response for complaints and encourage ownership by the service that most of the complaint relates to. The team provide regular feedback to the Housing Leadership Team and complete quality assurance checks on 10% of complaint responses using an agreed matrix.</p>

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>Investigating Officers are empowered to resolve complaints. Investigating Officers are also supported with guidance and advice from the Customer Relations Team if needed. In-house complaint handling training is provided for Investigating Officers.</p> <p>We also provide customer care training for all staff and additional training related to customer care skills to enable staff to sensitively and fairly deal with all enquiries (regardless of whether a complaint or not).</p>

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Yes	<p>We aim to log and acknowledge in no more than 5 working days. In line with the code we operate a two stage complaints process.</p>
4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	<p>Written acknowledgements briefly describe the nature of the complaint. For complaints acknowledged over the phone, the officer will clarify all the details with the customer before allocating to an Investigating Officer. As part of the investigation, the Investigating Officer should attempt to speak to the customer about their</p>

			complaint. This is our opportunity to understand the complaint in full, the impact to the customer and what the customer would like us to do to resolve the complaint.
4.6	A complaint investigation must be conducted in an impartial manner	Yes	Complaints are generally investigated by the service that they relate to as they are best placed in terms of access to information and remedies to be able to do so. In exceptional situations, we can consider another service area completing the investigation. A stage 2 investigation will always be undertaken by a senior officer. Any complaint received relating to a member of staff will not be investigated or responded to by that member of staff.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter</li> </ul>	Yes	In-house complaint handling training is provided for Investigating Officers. Further advice and guidance can be obtained from the Customer Relations Team if necessary. Additionally, the Housing Customer Care and Inclusion team provide support sessions for Investigating Officers on individual complaints. All staff also undertake mandatory annual information governance training so that we properly manage people's information.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	When a complaint is logged, the officer asks the customer how they would like to be communicated with. If the response timescale needs to be extended, this is agreed with the customer. We would agree communication methods and frequency with the customer as part of the investigation.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	Officers are expected to make contact to discuss the complaint directly with the customer ahead of a final response.  Within the Council's two stage policy, should a customer be unhappy with how their complaint has been handled at stage 1, they are able to escalate this to stage 2. Customers are invited to set out the reasons for their dissatisfaction and



			<p>these will be investigated by a senior officer. A stage 2 response to a complaint would be considered the final decision and would then allow the customer to address their complaint to the Housing Ombudsman Service.</p> <p>At both stage 1 and stage 2, the complainant is given the opportunity to speak with the Investigating Officer for both the Investigating Officer and customer to understand each other's position and to help provide a considered and high-quality response.</p>
<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Our policy states 'We ask that that this is done within a reasonable timescale. We would expect a complaint to be escalated within a calendar month of a stage one response, however, this this can extended in exceptional circumstances.' We also include 'within 28 days' in the stage 1 response. We would always look at individual circumstances if asked to escalate after this time and not unreasonably refuse.
<b>4.14</b>	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	As above, this is set out in the complaints policy. A customer will be provided with reasons for why their complaint isn't being escalated alongside signposting to the relevant appeals process (if applicable) and to the HOS.
<b>4.15</b>	A full record must be kept of the complaint, any review, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	We have a central complaint logging system, and records are held on this.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint	Yes	Our complaints policy (appendix 2) describes how we manage persistent and vexatious complainants. We seek as far as possible to apply a balanced approach to ensure residents are able to maintain access to our service and make service requests. Should any aspect of this policy be applied, officers will also consider any equality considerations.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	We would expect the Investigating Officer to discuss openly and honestly the realistic remedies available to help manage tenant expectations. Our quality assurance checks and customer satisfaction monitoring allows us to check that Investigating Officers are having quality conversations with residents at the beginning of the complaint.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required	Yes	We seek to resolve complaints at the earliest possible opportunity by: <ul style="list-style-type: none"> <li>Identifying immediate service requests to action when we log the complaint</li> <li>Seeking a quality conversation with the customer prior to issuing the formal response</li> </ul> As above, the quality assurance and customer satisfaction monitoring give us feedback from residents who have been through the complaints process to help us understand and measure the extent to which we have done this.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	We accept complaints from advocates or representatives where this has been agreed with the customer. If no advocacy in place, we would direct the response to the customer and give advice about how advocacy can be established.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	We would direct customers to/refer to the tenancy agreement and any relevant legislation. Investigating Officers have access to our internal Legal Services for more complex cases. We are also aware of the importance of outlining both our responsibilities as a landlord and the customer's responsibilities as a tenant. Where appropriate, we would signpost customers to

			independent legal advice.
<b>4.9</b>	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Investigating Officers adopt a 'one council' response for complaints and respond as Housing Leeds. Individual staff members or contractors will only be referenced where a customer has specifically complained about an individual officer or contractor.
<b>4.10</b>	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our guidance for Investigating Officers clearly sets out the expectation that customers will be regularly updated on the progress of their complaint. We specifically ask for customer feedback on this subject to ensure continuous improvement. Our complaints management dashboard of information is also updated daily so that we have access to up-to-date information on the status of a complaint, the stage and the timescales remaining for a response.
<b>4.16</b>	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	We issue monthly satisfaction surveys to customers who have had a complaint response in the preceding month. We use this information to report to the leadership team and identify service improvement opportunities that are shared with staff and teams. Tenant members of the Leeds Housing Board have been involved as critical friends in this self-assessment. We also undertake our TSM/Satisfaction surveys on a quarterly basis to better understand trends and have access to more timely information about wider satisfaction with our complaints handling.
<b>4.17</b>	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	All our staff were set a complaints objective as part of their annual appraisal. Objectives are discussed at regular 1:1s throughout the year. Additionally, learning from complaints articles and updates are shared monthly through our staff e-bulletin. These are discussed at team meetings to ensure all staff are aware. We also share with staff and teams the compliments we receive to recognise what's gone well and to thank staff teams.

4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	We will only restrict or reduce customer contact as a last resort to safeguard staff. We will always ensure that a channel of communication is available.
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## Section 5 - Complaint stages

### Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Between April 2023 and October 2023, 87% of stage 1 complaints received a response in 10 working days or with an agreed extension.  Our overall performance is improving, and we are prioritising the improvement of complaint handling in terms of timescales and quality so that we meet a higher proportion of timescales in the future.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	This is in line with our current guidance to Investigating Officers.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate	Yes	Response templates support and guide Investigating Officers to respond to the complaint in full, with all relevant information
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	Our response templates have been reviewed and updated to ensure that customers are receiving detailed responses to their complaints. 10% of responses are checked for quality assurance and outcomes are fed back to the leadership team and relevant officers.

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Complaints are escalated to stage 2 where appropriate. If a complaint isn't being escalated, the customer will be provided with reasons for why their complaint isn't being escalated alongside signposting to the relevant appeals process (if applicable) and to the HOS
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	<p>Within the Council's two stage policy, should a customer be unhappy with how their complaints has been handled at stage 1, they are able to escalate this to stage 2. Customers are invited to set out the reasons for their dissatisfaction and these will be investigated by a senior officer. A stage 2 response to a complaint would be considered the final decision and would then allow the customer to address their complaint to the Housing Ombudsman Service.</p> <p>At both stage 1 and stage 2, the complainant is given the opportunity to speak with the Investigating Officer for both the Investigating Officer and customer to understand each other's position and to help provide a considered and high-quality response.</p>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	As per policy, we respond at stage 1 initially and escalate to stage 2 on the customer's or their representative's request
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	As per policy, the stage 2 will be investigated by a different senior officer
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Between April 2023 and October 2023, 91% of stage 2 complaints received a response in 20 working days or with an agreed extension.
5.16	Landlords must confirm the following in writing to the resident at	Yes	Our response templates have been reviewed

	<p>the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>		<p>and updated to ensure that customers are receiving detailed responses to their complaints. 10% of responses are checked every other month for quality assurance and outcomes are fed back to the leadership team and relevant officers.</p>
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### Stage 3

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

### Best practice 'should' requirements

#### Stage 1

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary, and any explanations</b>
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed	Yes	Any extension beyond 20 days is mutually agreed with the customer.

	by both parties.		
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We would provide contact details for the HOS
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	We would endeavour to look at relevant historical information to help provide a quality response and outcome for the customer.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Investigating Officers are encouraged to be flexible. At both stage 1 and stage 2, the complainant is given the opportunity to speak with the Investigating Officer for both the Investigating Officer and customer to understand each other's position and to help provide a considered and high-quality response. At this time, additional concerns or queries can be raised, if relevant.

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	Yes	Any extension beyond 10 days is mutually agreed with the customer.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	We would provide contact details for the HOS

## Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should	N/A	N/A

	be provided to the resident.		
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	N/A

## Section 6 - Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Part of the template response used by Investigating Officers prompts the officer to describe the actions they are taking to put things right. For example, putting right any outstanding repairs, undertaking further visits or appointments to support tenants or working with our contractors to carry out any further works. Any practical action to put the customer back in the position they would have been in if something hadn't gone wrong, including an apology for the failure in service
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Our guidance encourages Investigating Officers to understand the individual impact of any service failures and take appropriate action. This includes taking measures or steps to support residents with any additional needs. Our 'good will' guidance has been reviewed in line with good practice as suggested by the HOS. This provides staff guidance around financial and non-financial redress, which helps ensure a fair and consistent approach. Additionally, Investigating Officers are aware of adhering to city-wide policies and processes so that a consistent and fair service is provided for all.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	As per the guidance provided to Investigating Officers
6.6	In awarding compensation, a landlord must consider whether any	Yes	As above, guidance is provided to Investigating



	statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.		Officers in line with HOS good practice guidance. Where a customer is seeking a claim for personal injury or damage to property, this is dealt with through our corporate insurance claims process.
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	The Investigating Officers record the learning outcomes in an 'investigation record' for each complaint. This may be learning for an individual complaint in isolation or highlight where there's a wider issue or procedure that could be improved overall that is then shared with the relevant team. The Investigating Officers also have the autonomy to correct any processes/issues at the time of responding to any individual complaint where we can put right something for tenants more widely e.g. identifying a wrong number of a letter template, and correcting this straight away.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Investigating Officers have access to legal advice where appropriate.

### Section 7 - Continuous learning and improvement

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutiny panels.	Yes	We shared a summary of complaints performance and learning in our <a href="#">2022-23 Annual Report to Tenants</a> in August 2023  For staff we share: <ul style="list-style-type: none"> <li>- Regular learning from complaints articles in our staff e-bulletin</li> <li>- A monthly performance summary of complaints with managers. This includes</li> </ul>

			<p>access to a dashboard where staff can access regular information in terms of numbers, types, and about what issues.</p> <ul style="list-style-type: none"> <li>- Quarterly summary reports are shared with the leadership team.</li> <li>- Feedback from quality assurance checks with relevant officers/the service</li> </ul> <p>For our governing body we provide regular complaints management information and the opportunity for our board to challenge our performance and wider complaints management activity.</p> <p>Complaints' performance and an overview of service actions in response to complaints learning is also reported to the council's Environments, Housing and Communities Scrutiny Board and the Corporate Governance and Audit Committee.</p> <p>Complaint information is also offered to the Tenant Scrutiny Board to help inform them of potential future areas of inquiry.</p>
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Tenant Board Members on the Leeds Housing Board have confirmed their wish to undertake this role and have been updated and provided additional support. This will be confirmed at the January 24 Board. Councillor Coupar is the overall lead for complaints at Leeds City Council.

7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</li> <li>• The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	<p>Complaints management information and the learning from complaints is regularly considered by the leadership team and is reported to the Leeds Housing Board. We can strengthen this within the greater involvement of complaints champions.</p>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	Yes	<p>Complaints management information and learning from complaints is regularly considered by the leadership team. Over the last 12 months we have:</p> <ul style="list-style-type: none"> <li>• provided refresher training/ extra guidance to staff</li> <li>• continued to share our monthly 'hints, tips, and reminders' for all staff</li> <li>• developed our damp and mould team to help with the early intervention and triage of cases.</li> <li>• used customer satisfaction data to address dissatisfaction and put in place service improvements</li> </ul>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	<p>All Housing Leeds staff were set a complaints objective for 2022/23 depending on their role.</p> <p><b>All staff</b></p> <ul style="list-style-type: none"> <li>• Work with customers to resolve queries at first point of contact where possible</li> <li>• To be familiar with the complaints policy so that you can advise customers about this and how they can access the complaints process if needed.</li> </ul>

			<p><b>Investigating Officers</b></p> <ul style="list-style-type: none"> <li>• Work with colleagues and other service areas to respond to complaints in line with the Housing Ombudsman Complaint Handling Code</li> <li>• Ensure that individual circumstances are taken into account, and reasonable adjustments considered for customers going through the complaints process</li> <li>• Using the support and training available, provide high quality complaints responses</li> </ul> <p><b>Area/Service Managers</b></p> <ul style="list-style-type: none"> <li>• To help create a strong learning from complaints culture by <ul style="list-style-type: none"> <li>○ regularly monitor performance and reviewing the quality of complaint responses within your service area</li> <li>○ working with Customer Relations and Customer Insight to identify and share learning from complaints within your service area.</li> <li>○ supporting teams to improve the quality of responses through regular training and awareness sessions or other activity.</li> </ul> </li> </ul>
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## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Completed annually as per requirements in the Code
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	N/A	During the period of this self-assessment, we have not undergone any significant restructure or changes to process.

<b>8.3</b>	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	<p>The self-assessment is shared with our Executive Member before publication and a link is shared in our regular city-wide ward member update. The latest version of our self-assessment is on our website. The self-assessment is signposted in our Annual Report. A copy of this self-assessment is due to be considered by the Leeds Housing Board in January 24.</p>
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