



Report to Policy Committee:

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Tel: 0114 474 2736

Report of: *Ajman Ali (Executive Director, Operational Services)*

Report to: *Housing Policy Committee*

Date of Decision: *14th September 2023*

Subject: ***Housing Ombudsman Complaint Handling Code - Self-Assessment***

Has an Equality Impact Assessment (EIA) been undertaken?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
If YES, what EIA reference number has it been given? <i>(Insert reference number)</i>				
Has appropriate consultation taken place?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Has a Climate Impact Assessment (CIA) been undertaken?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Does the report contain confidential or exempt information?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Purpose of Report:

The Complaint Handling Code was introduced in July 2020 by the Housing Ombudsman and updated further in April 2022. It sets out how the Housing Ombudsman expects social landlords to manage customer complaints, describes best practice and supports landlords in responding to complaints effectively and fairly.

A requirement of the Code is that social landlords assess their complaints handling against the Code annually, using a standard template provided by the Housing Ombudsman. Also, that social landlords report the outcomes of the assessment to Elected Members and publish the assessment on their website and in their annual report.

An assessment against the code was undertaken in July 2023 and the purpose of this report is to:

- Inform Housing Policy Committee of the outcomes of the assessment, and of the actions agreed to address any areas of non-compliance.
- Seek the Housing Policy Committee's approval to publish the outcomes of the assessment.

Recommendations:**The Housing Policy Committee is recommended to:**

- Note the outcomes of the self-assessment against the Code.
- Approve the publication of the outcomes of the assessment.
- Request an update in 6 months' time on complaints-handling performance, to support compliance with the Code

Background Papers:

(Insert details of any background papers used in the compilation of the report.)

Appendix A - SCC's Housing Ombudsman Complaints Handling Code Self-Assessment Form

Lead Officer to complete:-		
1	I have consulted the relevant departments in respect of any relevant implications indicated on the Statutory and Council Policy Checklist, and comments have been incorporated / additional forms completed / EIA completed, where required.	Finance: <i>Helen Damon</i>
		Legal: <i>Rebecca Lambert</i>
		Equalities & Consultation: <i>Louise Nunn</i>
		Climate: <i>N/A – no climate-related implications of the proposals</i>
	<i>Legal, financial/commercial and equalities implications must be included within the report and the name of the officer consulted must be included above.</i>	
2	EMT member who approved submission:	<i>Ajman Ali</i>
3	Committee Chair consulted:	Cllr Douglas Johnson
4	I confirm that all necessary approval has been obtained in respect of the implications indicated on the Statutory and Council Policy Checklist and that the report has been approved for submission to the Committee by the EMT member indicated at 2. In addition, any additional forms have been completed and signed off as required at 1.	
	Lead Officer Name: Darryl Smedley <i>(Insert name)</i>	Job Title: Head of Service, Housing and Neighbourhoods Service <i>(Insert job title)</i>
	Date: 4th September 2023	

1. PROPOSAL

- 1.1 In July 2020, the Housing Ombudsman introduced its Complaint Handling Code, with which all social landlords are expected to comply. Updated further in April 2022, the Code sets out how the Housing Ombudsman expects social landlords to manage customer complaints. It also requires social landlords to assess their handling of complaints against the Code annually and publicly share the outcomes.
- 1.2 Most of the elements within the Code are ‘must do’ requirements and all social landlords are expected to comply with these. A smaller number of requirements are given as ‘best practice guidance’ and, whilst these are not mandatory, social landlords should aim to comply with these wherever possible. The Code hasn’t changed since our last self-assessment was presented to Housing Policy Committee in September 2022.
- 1.3 Officers from the Housing and Neighbourhoods Service, Repairs and Maintenance Service and Customer Services have undertaken this year’s self-assessment over the last 3 months. This has involved reviewing policies, procedures, information provided to customers, training materials, customer satisfaction data and performance information – to assess how well we comply with each element of the Code.
- 1.4 In total, there are 70 elements within the Code and overall, we measure well against the requirements and are compliant with the vast majority. Our complaints policies, procedures and principles are in line with the Code, our tenants have access to clear and comprehensive complaints information, staff are suitably trained in handling complaints, and we put things right.
- 1.5 In 2022, there were 2 ‘best practice’ elements against which we were non-compliant, and a further 10 against which we could demonstrate only partial compliance (4 of which were mandatory elements).
- 1.6 Significant progress has been made over the last 12 months to address these gaps, and this year there are only 2 elements where we can only demonstrate partial compliance. These relate to:

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.	Partially	We do report on learning from complaints in our annual report, but we need to do this more frequently through other communication channels. Plans are in place for a ‘You Said We Did’ process which will enable us to routinely capture and report on the learning from complaints. This sharing of outcomes will be done via well-established tenant communication channels such as Facebook and our monthly tenant e-bulletin.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the	Partially	Training emphasises how complaints are ‘everyone’s business’. However, this is not yet embedded through annual

	<p>need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. • take collective responsibility for any shortfalls identified through complaints rather than blaming others. • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 		<p>performance reviews and one-to-ones with staff.</p>
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1.7 An action plan is in place which not only addresses the gaps identified by the self-assessment, but also aims to further improve our complaints handling performance. The focus of the action plan is to:

- (i) Improve the time taken to respond to complaints.
- (ii) Improve how we capture, report, and utilise the wider learning from complaints.
- (iii) Improve customer satisfaction with how we handle their complaints.

1.8 A Customer Services Improvement Group – consisting of key officers from Housing and Neighbourhoods, Repairs and Maintenance Service and Customer Services – is responsible for overseeing the action plan and ensuring / supporting its implementation.

2. HOW DOES THIS DECISION CONTRIBUTE?

2.1 By completing the self-assessment against the Housing Ombudsman’s code, sharing the outcomes, and taking actions to address the gaps identified, we are demonstrating a clear commitment to effectively handling and learning from housing-related complaints. This contributes to the primary goal in the Council’s Delivery Plan to *“be a good council and ensure high quality services for all.”*

2.2 This work is also important in terms of the new Regulator of Social Housing Consumer Standards and will contribute to us meeting the Transparency, Influence and Accountability Standard. It also helps us achieve our aim of ensuring that complaints are addressed fairly, effectively, and promptly.

3. HAS THERE BEEN ANY CONSULTATION?

3.1 Officers from the Housing and Neighbourhood Service, Repairs and Maintenance Service and Customer Services team have worked together to draft the self-assessment.

3.2 Once the self-assessment has been approved by Housing Policy Committee, it will be published on the Council’s website and to residents via our usual communications channels (e.g., tenant newsletters and our Facebook page). We will consult with the Housing and Neighbourhoods Advisory Panel (a group which consists of tenant representatives from across the city) on the action plan and seek their views on how we can improve, how we manage and learn from complaints.

4. RISK ANALYSIS AND IMPLICATIONS OF THE DECISION

4.1 Equality Implications

- 4.1.1 There are no equalities implications arising from this report, and the Equalities team have confirmed that no Equalities Impact Assessment is required. A key requirement of the Housing Ombudsman’s Code is that all complaints are handled consistently and fairly, regardless of who has submitted them. The Code requires us to facilitate reasonable adjustments in how we deal with complaints where the customer requires this. Therefore, adherence to the code promotes equality and fairness in how we deal with complaints.
- 4.2 Financial and Commercial Implications
- 4.2.1 There are no financial or commercial implications arising from this report.
- 4.3 Legal Implications
- 4.3.1 The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of, and Schedule 2 to, the Housing Act 1996 (as amended by the Localism Act 2011 and the Building Safety Act 2022). The Act requires social landlords, as defined by section 51(2) of the Act, to be members of an approved scheme. It is mandatory for all local authorities and registered social housing providers to be members of the Ombudsman Scheme. The current revised version of the Housing Ombudsman Scheme came into effect on 1 October 2022 and replaces the previous Scheme which was in operation from 1 September 2020.
- 4.3.2 A new version of the Housing Ombudsman “Complaint Handling Code” came into effect on 1 April 2022, but landlords were given until 1 October 2022 to become compliant. Landlords were able to do their self-assessment on the new version of the Code at a time that assisted with auditing compliance and/or the work they were intending to do to achieve compliance by 1 October 2022. Sheffield City Council submitted the 2022 self-assessment using the new version of the Code and continue to use this version for the 2023 self-assessment.
- 4.4 Climate Implications
- 4.4.1 There are no climate implications arising from this report.
- 4.5 Other Implications
- 4.5.1 There are no other implications arising from this report.

5. ALTERNATIVE OPTIONS CONSIDERED

- 5.1 Self-assessment against the Housing Ombudsman’s Code and publication of the outcomes, are a requirement of all social landlords. Therefore, in this respect there were no other alternatives considered.

6. REASONS FOR RECOMMENDATIONS

- 6.1 Housing Policy Committee is being asked to note the self-assessment and to give its approval for publication of the assessment on the Council website because this will help us achieve transparency and accountability in how we manage with housing-related complaints. It is also a requirement of the Housing Ombudsman for all social landlords that we do so.
- 6.2 It is also being asked to request an update report on complaints handling in 6 months’ time (March 2024) as this will support our compliance with the Complaints Handling Code. The Code (section 7.4) requires that landlords provide the ‘governing body’ with regular complaints reports. A 6-monthly update will supplement the bi-monthly performance updates which Committee receive which include summary complaints performance data.

Appendix A – 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	Our definition is “Any expression of dissatisfaction, whether justified or not. This could be about a service that the Council delivers or is responsible for (e.g. a service delivered on behalf of the council by a contractor).” This definition is comparable, this is evidenced by the policy itself which demonstrates that we will accept a complaint whatever channel is used. Evidence: Sheffield City Council Complaints Policy (herein referred to as ‘Policy’) 1.4, 2.2, 2.3, 3.1
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	We are compliant. Evidence: Policy 9.3
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	Our procedure says that we ask the individual if they want their issue treating as a complaint. If a customer has to chase a request for service this would be logged as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our policy is clear that we will deal with all complaints through the agreed process unless certain conditions apply. Evidence: Policy section 3
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable	Yes	Paragraphs 3.8 – 3.11 of the Policy outline matters that have other dedicated routes for consideration; matters that fall outside of the scope of the policy or situations where we would not consider a complaint under the complaints policy. Exclusions exist where

	to residents.		there are legitimate and justifiable reasons. Page 11 “Best Practice” of the Sheffield City Council Corporate Complaints Procedure (herein referred to as Procedure) requires us to always explain to the customer our reasons for rejecting.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	We rarely reject a complaint – at times we may refer to other routes where this is applicable, and the reasons for this explained to the customer. We include Housing Ombudsman details in all complaints responses.

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We are compliant – if any doubt we will log a complaint
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	Automated responses for completed text surveys signpost to complaints info, and this info has now also been added to our telephone surveys.

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 of the potential channels, there must be more than one route of access into the complaints system.	Yes	Customers can make a complaint through our website (on-line form), by email, by telephone, in writing or in person. We do not require customers to make their complaint in writing. Evidence: Policy 1.4

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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/complaints The Policy and Procedure are both published on the website and cover all the required elements. (Links to 2.6 below)
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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/complaints There is a dedicated page on the website, which comes up at the top of the search results if a customer searches for 'complaints.'
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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/access-disabled-people The above link outlines the Council's general approach to equalities and reasonable adjustments. The Policy states that we will aim to ensure that individual needs are considered when dealing with complaints. The complaints info on the website also signposts customers to our policy on reasonable adjustments. The Procedure refers to reasonable adjustments and gives guidance on how to deal with them, and tells staff to "Consider whether the complainant needs support understanding your decision. This may be a meeting to discuss the findings" Equalities training is mandatory for all staff to ensure equalities are considered in all aspects of our work.
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	Complaints information is clearly published on the website, and complaints correspondence to customers references the Housing Ombudsman. We also included info on how to make a complaint, and on the Housing Ombudsman, in the annual rent increase letters to all tenants, and have put articles in our tenant e-bulletin.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is available on the SCC website and our templates have been amended to ensure complainants are advised that they have this right of access on at all stages of the process. Also included in the info referenced above in 2.7.
2.8	Landlords must provide early advice to residents regarding	Yes	All relevant templates have this info included.

	their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.		
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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	We do accept complaints via our Face Book page. And complaints received this way are subject to the same handling as all other complaints.

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	There are two Complaints Managers within the Customer Services Team which provide this support. There are a number of Complaints Investigating/ Accountable Managers in Housing and Neighbourhood Service (H&NS) and Repairs and Maintenance Service (R&M).
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	There are no conflicts of interest and staff do not investigate complaints relating to themselves. Complaints handlers are required to attend the corporate training. Corporate HR policy requires all staff to sign and complete the 'declaration of interest' form annually.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents 	Yes	We are compliant and all these requirements are covered in complaints training.

	<ul style="list-style-type: none"> • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 		
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Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	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 within five days of receipt.	Yes	Our Customer Relationship Management (CRM) has a dedicated complaints module, where all complaints at all stages are logged and tracked. All 'problem solved complaints' are recorded as Stage One complaints. Acknowledgment letters are sent within 3-5 days, and page 8 of the Procedure confirms this. If complaints are 'problem solved' this is done within 3 working days, so still compliant and recorded as Stage One.
4.2	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.	Yes	Page 11 of the Procedure explains how staff will define / verify the complaint with the individual. Our acknowledgement letter-templates have been amended to include a description of outcomes wanted by the customer. And quality assurance checks look at whether initial contact was made with the customer to verify.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our Policy ensures that this is the case: https://www.sheffield.gov.uk/home/your-city-council/complaints 2.4 in the Policy describes our overall approach to handling complaints.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address 	Yes	Our Procedure ensures that this is the case: Corporate Complaints Procedure: Effective Complaint Handling Guide (sheffield.gov.uk) Section 9 of the Procedure explains how we

	<p>any actual or perceived conflict of interest</p> <ul style="list-style-type: none"> • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 		maintain confidentiality
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Our Policy states that we will keep customers regularly updated on the progress of their complaints. Page 4 of the Procedure references giving 'regular updates'
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 set out their position comment on any adverse findings before a final decision is made.	Yes	<p>Investigation responses inform resident of landlord's position and gives the customer the right to respond and request a review of the complaint investigation by a more senior manager. Where the complaint is about a particular staff member, the Investigating Officer will talk to that person as part of their investigation.</p> <p>From October, managers will also be required to telephone the complainant before the response is sent, to discuss the outcome of their complaint and explain the findings of the investigation.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>Our Policy makes this clear.</p> <p>Evidence: https://www.sheffield.gov.uk/home/your-city-council/complaints</p>
4.14	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	Paragraphs 3.8 – 3.11 of the Policy clearly outline the circumstances in which we would not accept a complaint.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the	Yes	We have a CRM system on which all complaints and associated documents are logged and managed.

	resident, correspondence with other parties and any reports or surveys prepared.		
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	This is included in the Policy: https://www.sheffield.gov.uk/home/your-city-council/complaints Section 11 of the Policy covers this, as does page 18 of the Procedure.

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	Page 11 of the Procedure references the requirement on staff to 'manage expectations' and this is also made clear in the guidance for effective complaints handling.
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	The problem-solving stage gives us this opportunity and our process is designed to do exactly this. (4.2 – 4.3 of the Policy).
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 are compliant, as long as we have the authority to discuss with a representative. 9.3 of the Policy covers this in part
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 do engage our Legal Team in complaints responses where necessary to ensure the correct wording is used and that the legal positions are clear.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We are compliant unless the complaint is about a staff member.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Page 12 of the Procedure requires staff to "Keep the complainant informed at all stages of the investigation, especially if there is a delay"
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a	Yes	We include complaints-related questions as part of our regular 'Neighbourhood Survey' (as required by the regulator). Corporate complaints team also undertake their own satisfaction surveys via text messaging.

	positive complaint and learning culture.		
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	Recent changes to the CRM system will support us to capture the learning gained from complaints. Performance reports will be circulated to Directors to enable them to identify key issues / trends, etc. All staff are offered training on complaints – this emphasises that complaints are valuable feedback to be learned from.
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	Section 11 of the Policy and Page 18 of the Procedure explain our policy re unacceptable behaviour. Also clearly covers how any special needs / equalities issues should be considered.

Section 5 - Complaint stages

Mandatory 'must' requirements - Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	The timescales set down in our complaints process are compliant with this.
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	Our timescales are set out in the Policy and we are compliant with this.
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	We are compliant and have letter templates for staff to use and refer to.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions 	Yes	We are compliant and have letter templates for staff to use and refer to which cover all of these points.

	<p>made</p> <ul style="list-style-type: none"> • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 		
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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	Our Policy and Procedure demonstrate compliance.
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	Our Policy is compliant with this
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	We are compliant. The Policy and Procedure both demonstrate this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	We are compliant. The Policy and Procedure both demonstrate this.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be	Yes	The timescales set out in our Policy and Procedure.

	received. This should not exceed a further 10 days without good reason.		
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> · the complaint stage · the complaint definition · the decision on the complaint · the reasons for any decisions made · the details of any remedy offered to put things right · details of any outstanding actions and · if the landlord has a third stage, details of how to escalate the matter to stage three · if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	We are compliant, and managers use letter templates which cover all of these points.

**Best practice ‘should’ requirements
Stage 1**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	We do this as part of our agreed corporate process.
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	All complaints letter templates include the Housing Ombudsman’s contact details.
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	Investigating Managers will review all the history of a case as part of their investigation.
5.7	Where residents raise additional complaints during the investigation, these should	Yes	We are compliant

	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.		
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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	We are compliant and is covered by our Policy and Procedure
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	All complaints letter templates include the Housing Ombudsman's contact details.

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	Our Policy and Procedure cover this – see: Corporate Complaints Procedure: Effective Complaint Handling Guide (sheffield.gov.uk) , page 11 Letter templates also demonstrate this
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Section 5 of the Policy outlines approach to "Putting things right and learning". Our approach to remedies are consistent with the key principles used by the Housing Ombudsman. Page 15 of the Procedure explains in more detail our approach.
6.5	The remedy offer must clearly		Our templates evidence this.

	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	
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Our guidance on putting things right is clear and detailed (pg. 15 of the Procedure). It states that we should 'put the complainant back in the position they would have been had the fault not occurred'. It also incorporates the Local Government and Social Care Ombudsman's 'Guidance on Remedies' to ensure we are adhering to those principles, and requires officers to take into account the distress and / or inconvenience caused.

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	A new 'Learning Dashboard' is to be introduced in 2023. Currently complaints information is shared regularly with managers so that improvements and learning can be identified. Arrangements are now in place for 'Complaints Surgeries' at which HoS will have sight of all complaints in their areas and discuss the emerging issues with managers. Complaints will now be reported quarterly to Performance Delivery Board (attended by Senior Managers) and a key focus will be emerging trends and service-wide learning.
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	We are compliant and we do this, where there is a legal element to a complaint.

Section 7 - Continuous learning and improvement Mandatory 'must' requirement

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,	Partially	We do report on learning from complaints in our annual report, but we need to do this more frequently through other communication channels. Plans are in place for a 'You Said We Did' process which will enable us to routinely capture and report on the learning from complaints. This sharing of outcomes will be done via well-established tenant

	staff and scrutiny panels.		communication channels such as Facebook and our monthly tenant e-bulletin.
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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	Darryl Smedley is the Head of Service and oversee complaints, taking reports to meetings with managers and tenant representatives. This self-assessment is being reported to Housing Policy Committee.
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	The annual self-assessment is taken to the Housing Policy Committee and also a detailed mid-year update. Also, performance reports – including on complaints – are taken to Committee bi-monthly.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be	Yes	As per 6.3

	used to inform staff and contractor training.		
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"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Partially	Training emphasises how complaints are ‘everyone’s business’. However, this is not yet embedded through annual performance reviews and one-to-ones with staff.

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	We do a self-assessment every year
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Not applicable currently, but we would do this if a change in circumstances required it.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>This assessment is to be published once approved by the Housing Policy Committee. The previous assessment undertaken in 2022 is on the website.</p> <p>We also include information about complaints performance in our annual report to tenants.</p>

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