

## Housing Ombudsman Complaint Handling Code 2024 Compliance Action Plan

### Annual reporting and submission to Housing Ombudsman

Ref.	Code section	Current position	Action required	Owner	Complete	Status
CAP1	<p>8.1 Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</p>	<p>Assessment carried out. Areas of non-compliance have been identified and action plan produced. Solutions being discussed</p> <p>Quantitative data available from Salesforce</p>	<p>Produce an action plan to show how and when we are going to meet areas of non-compliance with the Code</p> <p>Complete our own self-assessment against Code</p> <p>Produce Annual Complaints Report including service improvements from learning from complaints</p> <p>Publish Annual Complaints Report and Boards Response including the self-assessment on CBC website</p> <p>Complete HO's electronic self-assessment and submit to Ombudsman</p>	HSET Manager	June 24	Complete
CAP2	8.2 The annual complaints performance and service improvement report must be reported to the landlord's	Annual report scheduled for Cabinet Member	Submit Annual Complaints Report to Cabinet Member Meeting for scrutiny and response	Service Director Housing	June 24	Complete

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	governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	meeting on 17 <sup>th</sup> June  Housing Advisory Board being established for consideration of future reports				
CAP2.5	8.3 Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	New self assessment and action plan required following policy changes	Updated self-assessment requires submission to Ombudsman	HSET Manager	Q3	In progress  Action plan has been updated and Self-assessment ready for sign off from HAB/MRC

## Policy

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP3	2.3 Landlords must consider whether to apply discretion to accept complaints made outside this time limit ( <i>12 months</i> ) where there are good reasons to do so.	Currently policy specifies 12-month time limit	Amend current policy to include discretion to accept complaints outside of the 12-month timescale	Service Director Digital, HR and Customer Services	July 24	Complete – policy updated July 24
CAP4	3.5 The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Currently policy does not explain how we will publicise the stated information	Addition to policy to specify how we will publicise details of our Complaints Policy, Ombudsman and Code	Service Director Digital, HR and Customer Services	July 24	Complete – policy updated July 24
CAP5	6.3 Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Current policy states 10 working days from the complaint is logged –	Policy change needed to recognise the full response is required within ten working days from the date of the complaint being acknowledged.  Salesforce will also need updating to recognise new timescale	Service Director Digital, HR and Customer Services	Already compliant as current target exceeds HO target	Complete – policy updated July 24  ICT change went live beginning of September 24

## Training and procedures

No.	Code section	Current position	Action required	Owner	Target date	Status
CAP6	1.3 Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint	Presently no processes / training in place to ensure people expressing dissatisfaction are given the choice to make a complaint.	Update Call Centre Scripts/Procedures so that all expressions of dissatisfaction are flagged, and the choice offered to make a complaint. Produce complaint training material for all staff to ensure this approach is embedded.	Service Director Housing	Q4 2024 /25	In progress CSC now offering choice to make a complaint where dissatisfaction expressed. Training material being produced to roll out across all Council
CAP7	1.6 An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must	Dissatisfaction expressed through a survey is not defined as a complaint.  Where a specific issue is raised on a survey, the respondent is contacted by the relevant team with the aim of dealing with the issues – if	Information about making complaints needs to be added to standard surveys and letters.  Review and redesign of transactional surveys to include opportunity to complain or be able to raise a complaint	Housing Strategy and Engagement manager	Q2 2024/25	In progress Review underway

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	provide details of how residents can complain.	<p>survey response are not provided on an anonymised basis</p> <p>Details about making a complaint not currently provided when asking for wider feedback.</p>				
CAP8	3.2 All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Currently unclear whether all staff are aware of the complaint process and what to do if they receive a complaint. The HO has stated in previous webinars that complaints need to be logged even if made verbally out on the estate.	Clear processes should be in place for all staff on what to do if they receive a complaint via whatever channel – consider adding instructions on Aspire and other internal promotion (team meetings etc) so all staff know how to get a complaint logged.	Service Director Housing	Q4 2024 /25	<p>In progress</p> <p>Discussions in place to ascertain best way for trades operatives to be able to capture complaints</p> <p>Housing Officers have received complaints training</p> <p>Training material being produced to</p>

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						roll out across all Council
CAP9	6.1 Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk	Not aware of any formal processes where complexity, vulnerability or risk is considered	Procedures needed to ensure the complexity of a complaint is taken into consideration and whether a resident is vulnerable or at risk  Adoption of vulnerability policy	Service Director Housing	Q3 2024	In progress  Vulnerability Policy now in place  Reasonable adjustments question added to complaints form  Training materials being produced to include consideration of tenant vulnerabilities

## Documents (including electronic)

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP10	5.6 When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and <b>the outcomes the resident is seeking</b> . The Code will refer to this as "the complaint definition"	The outcomes the resident is seeking are not set out as these are not asked	Adoption of new Complaints Policy and change to ICT complaints system to facilitate  Add a "what would you like us to do to put it right" box on the online and paper forms	Service Director Digital, HR and Customer Services	Q2 2024/25	<b>Complete</b>  New question added to complaints form asking 'what we can do to put it right'
CAP11	5.7 When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear  6.2 Complaints must be acknowledged, defined and logged at stage 1	Understanding of the complaint is currently not set out at the acknowledgment stage as complaints are not 'defined' at acknowledgment	Standard acknowledgment processes and letters need reviewing to include the definition at the acknowledgment stage  Decisions needed as to who is going to be responsible for 'defining' the complaint and which process	Service Director Digital, HR and Customer Services	Q2 2024/25	<b>Complete</b>  ICT changes made and changes to standard template letters now include definition of complaint at acknowledgment

## Information Analysis

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP12	1.4 Service requests are not complaints, but must be recorded, monitored and reviewed regularly	Complaints re-classified as service requests not currently recorded/monitored	Additional development of service request monitoring required as part of changes to Complaints system ICT	Service Director Digital, HR and Customer Services	Q2 2024/25	Complete ICT changes made so reclassified complaints can be monitored
CAP13	2.1 If landlords decide not to accept a complaint they must be able to evidence their reasoning.  8.1 b a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept.	Not currently evidenced	Number and the types of complaints not accepted and the reasons why is required  Additional development monitoring required as part of changes to Complaints system ICT	Service Director Digital, HR and Customer Services	Q4 2024/25	In progress ICT changes have been made – reports from the system need to be developed
CAP14	8.1 d the service improvements made as a result of the learning from complaints;	Some improvements have been evidenced using complaints data but requirement for	Bespoke manager reports and ability to review on Salesforce needed. Review of licences and access	Service Director Housing	Q3 2024/25	In progress New section on ICT system now requires managers to detail the learning from



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		<p>more systematic recording.</p> <p>Standardised agenda item on management of learning from complaints</p>				<p>complaints which make learning easier to evidence and analyse</p> <p>Licences being updated to allow Managers to view and create reports</p>

## Culture/ Customer Care

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP15	4.3 Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	<p>Lack of resources meaning responses falling out of timescales</p> <p>Video's and other guidance available on Aspire. No formal evidence of staff training in complaint handling</p>	<p>Extra complaint handling resources and management emphasis required to ensure that complaints are dealt with as a priority</p> <p>Training modules on Aspire with links to HO's online training courses</p> <p>Introducing standardised item on management meeting agendas</p>	Service Director Housing	Q3 2024	<p>In progress</p> <p>Extra officer in place in HPS to deal with complaints.</p> <p>Plans in motion to bring complaints under Housing Services ownership rather than CSC</p> <p>Training materials are in development</p> <p>Complaints are now standard item on management meeting agenda</p>
CAP16	5.9 Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident	Routinely, responses fall outside of timescale with no communication and	Processes need to be put in place so that if a complaint is not answered within timescale for whatever reason, the	Service Director Housing	Q4 2024/25	<p>In progress</p> <p>Extra officer in place in HPS to deal with complaints</p>

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	suitable intervals for keeping them informed about their complaint.	tenant not kept informed	complaint handler stays in regular contact with the complainant to keep them updated about what is happening (e.g. waiting for information, waiting for reports, etc)			Plans in motion to bring complaints under Housing Services ownership rather than CSC  Training materials are in development
CAP17	6.4/6.15 Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10/20 working days without good reason, and the reason(s) must be clearly explained to the resident	Extensions currently not utilised effectively	Produce guidance/ training on applying extensions for Stage 1 and Stage 2 complaints and importance of managing customer expectations	Service Director Housing	Q3 2024/25	In progress  Training materials being developed to include guidance on applying extensions
CAP18	6.7 Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing	Some complaint responses fall below the standard expected by the HO	Provide relevant training and guidance to two new customer services staff in repairs department	Service Director Housing	Q3 2024/25	In progress  Training materials being developed to include

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	the relevant policy, law and good practice where appropriate.					guidance on complaint responses
CAP19	9.2 A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Cannot currently demonstrate a consistent use of complaints intelligence to inform regular or routine service delivery improvements	Manager training on complaint handling  Introducing standardised item on management meeting agendas	Service Director Housing	Q3 2024/25	In progress  Extra officer in place in HPS to deal with complaints  Plans in motion to bring complaints under Housing Services ownership rather than CSC  Training materials are in development  Complaints are now standard item on management meeting agenda

## Oversight/Governance

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP20	9.4 Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Lead needs to be identified and confirmed	Identify suitable lead person as accountable for complaint handling  Housing Advisory Board being established to receive regular performance information regarding complaints	Service Director Housing	June 24  October 2024	Complete  Service Director – Housing identified in updated policy  Housing Advisory Board first meeting 8.10.24
CAP21	9.6 The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.  9.7 – As a minimum, the MRC and the governing body (or equivalent) must receive:	Cllr Innes identified as MRC  Reporting mechanisms for annual reports established.  Development of routine reporting mechanism required.	Housing Advisory Board being established to receive regular performance information regarding complaints	Service Director Housing	October 24	Complete  Housing Advisory Board established - first meeting 8.10.24

	<ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance information etc to the MRC</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints and performance and service improvement report</li> </ul>					
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## Remedies

Ref.	Code section	Current position	Action required	Owner	Target date	Status
CAP22	7.2 Any remedy offered must reflect the impact on the resident as a result of any fault identified  7.4 Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	No evidence that remedies offered take the HO's guidance into account	Ensure all Managers take into account the HO's guidance  <a href="https://www.housing-ombudsman.org.uk/centre-for-learning/key-topics/our-orders/ombudsmans-policy-and-guidance-on-remedies/">https://www.housing-ombudsman.org.uk/centre-for-learning/key-topics/our-orders/ombudsmans-policy-and-guidance-on-remedies/</a>	Service Director Housing	Q3 2024/25	In progress  Consider distribution as part of new policy and process  Training materials being developed to include guidance on remedies
CAP23	7.3 The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Inconsistency with remedies offered and no current reporting procedure to provide evidence that remedial actions are tracked through to completion	Policy/ procedure / ICT amendments. Recording outcomes after response to complaint to ensure that remedies have been completed.  Training to complaint managers and handlers	Service Director Housing	Q3 2024/25	In progress  Training materials being developed to include guidance on remedies  Changes to ICT system allow follow up actions

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