

Stevenage Borough Council Self-Assessment Form – April 2025

This self-assessment against the Housing Ombudsman's Complaint Handling Code (2024) has been completed by our Senior Strategic Complaints Manager, Business Improvement Manager and Special Projects Lead (Housing). It is a crucial part of our annual submission to the Housing Ombudsman Service and reflects our ongoing commitment to delivering a fair, accessible, and resident-focused complaints process.

It provides assurance to our residents, Councillors, the Housing Ombudsmen Service and the Regulator of Social Housing that we take complaints seriously, use them to drive service improvement, and continuously work to embed a positive complaints culture across the organisation.

The self-assessment has been reviewed at senior level to ensure transparency and accountability. The assessment along with the Annual Service Improvement Report will be published on the Council's website. We will also publish the Council's formal response.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Definition set out in point 4.1 of the Stevenage Borough Council (SBC) corporate Complaints Policy Definition mirrors that of the Housing Ombudsman in the Complaints Handling Code.	
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Included in our policy under point 4.2 and Appendix A (Making and Escalating a Complaint).	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must	Yes	Service request definition is set out in the policy under point 4.6. ‘When a complaint won’t be considered 4.6 Some contacts aren’t actually complaints at all, but are ‘service requests’. A service request is a contact from a resident	

	be recorded, monitored and reviewed regularly.		that brings a matter to the council's attention for the first time, and requests a service offered by the council, for example: <ul style="list-style-type: none"> • reporting a missed bin • raising a concern about food hygiene in a restaurant • reporting anti-social behaviour • reporting an adult or child safeguarding concern 	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Included in our policy under point 4.7 .	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	New service wide guidance on transactional surveys has been developed and implemented; this includes the requirement that the following message or comment will be included in all surveys:- *if dissatisfied or very dissatisfied selected, following message to appear: in line with the Complaint Handling Code 2024, an expression of dissatisfaction with services	

			<p>made through a survey is not defined as a complaint. If you would like to make a complaint you can do so through our website at www.stevenage.gov.uk.</p> <p>Whilst our Tenant Satisfaction Measures Perception Survey includes the following wording:- <i>'If you have a specific concern about the Council's housing services, please note this survey does not serve as a formal complaint. To make a complaint about the Council's housing services, please telephone 01438 242242, make a complaint using your My Stevenage online account, or use the online form accessed at https://www.stevenage.gov.uk/have-your-say/compliments-and-complaints'.</i>"</p>	
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Covered in our policy under point 4.4	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none">• The issue giving rise to the complaint occurred over twelve months ago.• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	Yes	Included in our policy under points 4.6 – 4. 8 .	

	<ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy. 			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Included in our policy under point 4. 3 and Appendix A – Making and Escalating a complaint	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Included in our policy under point 4. 4 .	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Included in our policy under point 4. 4 .	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Our Complaints Policy was subject to an Equality Impact Assessment before approval. Included in Appendix A of our policy, Making and escalating a complaint. Section 4.16 and 6 of our policy outlines our duty under the Equality Act 2010. Additionally, the Council's has a Reasonable Adjustment Policy that sets our approach to providing equal access to services.	<p>Residents can submit a complaint:</p> <ul style="list-style-type: none"> • on our website • Via their Online My Stevenage account • Via the telephone • In writing • And in person. • via a third party such as an elected member, advocate service or a family member. <p>Where permission is needed to progress the complaint, the resident will be contacted for this to be arranged.</p> <p>If a resident does not have telephone and/or online services, they are able to visit our offices to use a</p>

				council computer, or to book an appointment with an advisor.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Included in our policy under point 4.9 and 4.10.</p> <p>Guidance is provided to staff on the approach to be taken when receiving a complaint.</p>	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Section 1.2 of our policy sets out that we recognise that complaints give us the opportunity to improve our services and put things right.</p>	<p>Further to the policy, a monthly Complaint Clinic is chaired by a Director and the Portfolio Holder for Housing and Complaints. The sessions are focussed on learning from complaints, prioritising service improvements and bringing together Housing Service Managers to discuss outcomes from complaints, best practice and agree support for complex case work.</p> <p>Our annual report shows a reduction in complaints this year, however, this is as a result of service improvements driven by</p>

				<p>high complaint volume areas and demonstrates the learning and improvements we have made from complaints.</p> <p>We are seeing higher complaints volumes when comparing against the national median averages published by Housemark. We are committed to understanding why our peers may be reporting lower complaints volumes, however we have highlighted that our volumes may be reflective of a well-publicised and accessible complaints process.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p>Complaints Policy 2024 published online in full, along with summary key information on the webpage, to guide customers in a simple format.</p> <p>Furthermore, customers can request translations, braille or large print versions of the policy document, as highlighted on the</p>	

			front page of the policy document.	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Included in our policy under point 4.17.4</p> <p>4.17.4 The council's Complaints Policy and details about how to make a complaint, contact the relevant Ombudsman, and details of each Ombudsman's Complaint Handling Code will be published on the council's website.</p>	<p>Our annual Housing Complaints and Service Improvement Report will be presented to our Council Cabinet, along with this self-assessment against the Complaints Handling Code.</p> <p>These will also be made available to our residents on the Council's website, alongside information about the role of the Ombudsman in housing complaints cases.</p>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<p>This is covered in our policy under points 4.5 and Appendix A.</p> <p>It is also included in summary information on the 'Complaint Policy' webpage.</p>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.		<p>Outlined in the summary information made available on the 'Complaints Policy' webpage and in our policy under sections 4.12.13, 4.12.17 and Appendix A.</p>	<p>Our Contact Centre and Complaints team are well-versed in assisting customers in identifying the appropriate Ombudsman service for their complaints.</p>

				The details of the Ombudsman are available on both Stage one and two complaint responses.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Evidence, including relevant job descriptions are available at the request of the Housing Ombudsman	<p>In the Housing Service, there are four Strategic Complaints Manager (SCM) roles. These specialised roles independently investigate and address complaints while providing support to customers throughout the process. SCMs collaborate with service areas to enhance learning and improve service delivery.</p> <p>Additionally, the senior SCM coordinates information and communicates with the Housing Ombudsman regarding specific case work.</p> <p>This is also covered in our complaint handling procedure under roles and responsibilities.</p>

4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Evidence, including relevant job descriptions are available at the request of the Housing Ombudsman.	The Strategic Complaint Managers have access to staff at all levels, including the Strategic Director for Housing and the Cabinet Member for Housing. Additionally, a monthly complaint clinic is chaired by a member of the Strategic Leadership Team and Cabinet member for Housing (who is the MRC). During these sessions, the focus is on learning from complaints, prioritising service improvements, and bringing together Housing Service Managers to discuss complaint outcomes, share best practices, and agree on support for complex case work.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Stevenage Borough Council is committed to building a positive complaint handling culture. In 2024, a new policy and procedure was introduced to meet requirements from the Housing Ombudsman and establish best practice.	A dedicated team of specialist complaint handlers (SCMs) operates within the Housing Service. Their primary responsibility is to conduct independent investigations into complaints and provide timely

				responses. Additionally, SCMs collaborate closely with service managers to identify areas for learning and service improvements.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy 2024	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Our complaints handling procedure sets out the officer's responsibility under point 3.1. Our policy explains there is two stages to our complaints handling procedure, in point 4.12.	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Our policy explains there is two stages to our complaints handling in point 4.12.	

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.		Evidence of contract agreements and procedures are available at the request of the Housing Ombudsman.	Stevenage Borough Council records, investigates, and responds to all complaints related to contractors. When contractors are engaged in large-scale works, such as our Major Works Programmes, they appoint a Residents Liaison Officer. This officer works closely with residents to address onsite issues and guides residents to the formal complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Evidence of contract agreements and procedures are available at the request of the Housing Ombudsman.	Our in-house SCM's are responsible for ensuring a full investigation and response is given for all complaints relating to contractors.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	All complaints are reviewed, acknowledged and defined in-line with the complaint handling code. This is outlined in our procedure under point 3.3 and section 4 of the Complaints Policy 2024. Our standard templates include a section that sets out our understanding of the complaint, and where provided details of the outcomes that the	

			resident is seeking. This format is used in all cases.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Covered in our procedure under point 3.3. In all cases we will set out details of which aspects are being considered as part of the complaint, and we will provide clarification and justification on aspects of the complaint as appropriate.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Specialist Strategic Complaints Manager (SCM) roles within Housing are in place to undertake thorough and impartial investigations. Case notes and evidence will be used to support their findings.	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		Included in our complaint handling procedure under points 6.2 and 6.10. Included in our Complaints Policy section 4.12.3	As set out within our complaints procedure we do agree an update timeline with the complainant.

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	As set out in our Complaints Policy section 4.16.	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaints will not be refused unless there is a valid reason to do so, usually due to an alternative route as set out in points 4.4 - 4.8 and 4.12. in our policy .	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Casework evidence available at the request of the Housing Ombudsman.	The Council uses the Govmetric Casetracker IT System; an online system which allows complainants to complete the online form, receive notifications, updates and responses to their complaint. Where complainants do not use the online system, officers will input cases, and include contact details, and if suitable contacts are provided, residents can access the system directly.

				In all cases, the complaint is logged and managed within our Digital Platform. The system will date and time stamp the complaint and associated actions. The system will also hold documentation relating to the complaint, investigation, and the response.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	We are committed to making things right at all stages of the complaint process. When responding to any complaint, we will address the details of any remedies offered, See section 4.12 of Complaints Policy 2024.	We are currently reviewing and updating our approach to Compensation and Remedies, to reflect latest best practice and new contractual arrangements that we now have in place. This will enhance consistency, transparency and build on learning.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Unacceptable Behaviour Policy with references made within Complaints Policy at Section 4.18. Evidence of procedures are available at the request of the Housing Ombudsman.	Cases of unacceptable behaviour are processed through an internal online form for review and all decisions/actions are reviewed quarterly.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	Included under section 4 of the Unacceptable Behaviour policy.	

	for the provisions of the Equality Act 2010.			
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Our complaint handling procedure sets out the expectation of reviewing complaints and taking action in point 6.1.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	This is included in our policy under point 4.12	Our Complaints team will formally acknowledge a stage 1 complaint within 5 working days, providing a unique reference number, the complaint definition and a target response date.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our policy states response time for a stage 1 complaint in point 4.12, confirming a written	

			response within 10 working days of acknowledgement.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Our policy covers extension timescales in point 4.12.3 of the Complaints Policy . Details are also set out within our complaints procedure.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This is covered in point 4.12.3 of our Complaints Policy .	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This approach is set out in point 6.5 of our complaint handling procedure. Our Complaints Team manage our Complaints Action Tracker which records agreed actions, assigned responsibility and timelines for action. Residents are updated as appropriate.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	Our policy, section 4.9.5 addresses this point of the code. Additionally, our complaint handling procedure, outlined in	

	policy, law and good practice where appropriate.		Section 7, provides best practice for responding to complaints.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This is covered in point 4.13 of our policy.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Included in our policy under point 4.12.4.	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.		Included in points 4.12.5 of our policy.	Escalation details are provided to customers within both Stage 1 and 2 responses.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	This is included in our policy under point 4.12.5	Our Complaints team will formally acknowledge a stage 2 complaint within 5 working days, providing a unique reference number, the complaint definition and a target response date. . We will elaborate on section 4.12.5 of our Complaints Policy, to ensure it captures what a complainant should expect to see included in their acknowledgment letter.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	The Complaints Policy in 4.12.4 & 4.12.5 states that cases can be escalated if the complainant is not satisfied with the stage 1 response, no further justification is required.	
6.13	The person considering the complaint at stage 2 must not be the same	Yes	Included in our policy under point 4.12.6.	

	person that considered the complaint at stage 1.			
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Included in our policy under point 4.12.5	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Included in our policy under point 4.12.7	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Included in our policy under point 4.12.7	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This approach is set out in point 6.11 of our complaint handling procedure. Our Complaints Team manage our Complaints Action Tracker which records agreed actions, assigned responsibility and timelines for action. Residents are updated as appropriate.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	Included in our policy under point 4.12.4. additionally, our complaint handling	

	decisions, referencing the relevant policy, law and good practice where appropriate.		procedure outlines best practice in responding to complaints in Section 7.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Included in our policy under point 4.12.4.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our policy states a senior manager is responsible for a Stage 2 response in point 4.12.5	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or	Yes	Included in our policy under point 4.15 and our complaint handling procedure in section 7.	

	<p>intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Included in our policy under point 4.15 and our complaint handling procedure in section 7.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Included in our policy under point 4.15.1 and our complaint handling procedure in section 7.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Included in our policy under point 4.15.1.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Approach to reporting and governance set out in our policy in points 4.17.</p> <p>Our self-assessment against this code and our Housing Complaints Performance and Service Improvement Report will be published on our website annually, upon submission to the Housing Ombudsman, together with other key complaints information.</p>	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Our approach to sharing the annual report and self-assessment is included in point 4.17 of our Complaints Policy. The response of our Governing body will be captured in the report.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Self-assessment will be reviewed in-line with significant organisational, legislation and policy change.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Evidence will be provided to the Ombudsman following all investigation outcomes.	We will review and update the self-assessment to comply with any recommendations or orders from the Ombudsman.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Business continuity plans are available for the inspection of the Ombudsman.	The Council's Business Continuity arrangements for Housing and Customer service includes notifying the Housing Ombudsman and residents. Updates will be published, along with expected timelines for returning to normal operations.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	SBC is committed to improving service delivery for all residents. This is highlighted in the policy through points: 1.2, 4.17, 4.17.2, 4.17.3 and Appendix A.	Additionally, the SCM's collaborate with Service Managers to ensure lessons learned from complaints are put into practice, and they oversee reviews of HOS findings. This can include changes to policies, procedures and practices.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes		The council has prioritised complaint handling and a culture of learning from complaints. This has been recognised through additional resources to support complaints investigations and regular focused case review meetings. The Housing Complaint Clinic provides strategic and operational insight and oversight, with a clear focus

				on learning and service improvement.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Included in the policy, point 4.17..	<p>We have strengthened our governance structure by enhancing oversight through regular reporting, monitoring and senior scrutiny, ensuring greater accountability and learning at all levels of the organisation.</p> <p>Our annual report, which is shared with residents, captures our achievements and commitments, which are feedback led.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Included in the policy, point 4.17.3.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member	Yes	Included in the policy, point 4.17.3.	

	Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Included in policy points 4.17.1 and 4.17.3	TSM related Complaint data along with feedback and outcome of all Ombudsman cases are report on a quarterly basis as part of the Councils Corporate Performance Framework. This report is considered by the Councils Strategic Leadership Team which includes the Chief Executive and Monitoring Officer as well as the Cabinet which includes the Leaders of the Council and the MRC.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and 	Yes	Included in policy point 4.17.3	

	d. annual complaints performance and service improvement report.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>Included in staff annual objective setting.</p> <p>Strategic Complaints Management team</p> <p>Implementation of Housing Complaint Management Clinics.</p>	<p>Our Strategic Complaints Managers lead by example and provide support across all housing service areas, to ensure consistency of approach and maintaining our ethos for proactive complaint handling.</p> <p>Our Clinics were implemented to give clear oversight of our complaint handling and an opportunity to proactively respond to trends and promptly implement improvements based on our learning from complaint feedback, and the engagement wider picture. There is representation from each service area within housing in recognition of cross-cutting and the need for accountability in effective complaint management and optimum customer service.</p>