

## Appendix A: Self-assessment form

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

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

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

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

### Stevenage Borough Council Self-Assessment – 2025/26

This self-assessment against the Housing Ombudsman's Complaint Handling Code (2024) has been completed for 2025/26 by our Senior Strategic Complaints Manager, Business Improvement Manager and Special Projects Lead (Housing). It forms a key part of our annual submission to the Housing Ombudsman Service (HOS) and reflects our continued commitment to delivering a fair, accessible, and resident-focused complaints process.

Earlier this year, the HOS undertook a formal review of the Council's complaint handling policy as part of its monitoring of compliance with the Complaint Handling Code. The review identified 12 recommendations to support alignment with the Code and good practice across the sector. The Council has carefully considered this feedback, and its complaints policy has been fully reviewed to ensure that all recommendations are reflected and addressed. A structured programme of work is in place to support the implementation and embedding of these changes in practice. This self-assessment forms part of our response to that review and demonstrates the progress made to date, including how policy requirements are being applied effectively in practice.

Building on last year's assessment, it provides assurance to our residents, Councillors, the Housing Ombudsman Service and the Regulator of Social Housing that we take complaints seriously, use them to drive service improvement, and are embedding a positive complaints culture across the organisation.

The self-assessment has been reviewed at senior level to ensure transparency and accountability. This assessment, alongside our Annual Service Improvement Report, will be published on the Council's website, together with the Council's formal response.

## Section 1: Definition of a complaint

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                         | Comply: Yes / No | Evidence                                                                                    | Commentary / explanation                                                                                                                                                                                                                                  |
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| 1.2            | A complaint must be defined as:<br><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              | Section 6.1 of Complaints Policy (2026)                                                     | The definition set out in point 4.1 of our Complaints Policy (2026) mirrors that of 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              | Section 6.2 of Complaints Policy (2026) and Appendix A – Making and Escalating a Complaint. | We operate in line with our policy which states ‘a resident does not have to use the word <i>‘complaint’</i> for it to be treated as such’ and that a complaint can be made <i>‘through a third party, like a relative, support worker or advocate’</i> . |
| 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                                                                         | Yes              | Section 6.6 of Complaints Policy (2026)                                                     | Our policy explains the difference between complaints and service requests and defines a service request as <i>‘a contact from a resident that brings a matter to the council’s attention for the first time,</i>                                         |

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|     | right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.                                                                                                                                                                                                                                                                |     |                                                                                                                                                    | <p><i>and requests a service offered by the council’.</i></p> <p>These are recorded and monitoring using our customer contact system.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 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 | Section 6.7 of Complaints Policy (2026)                                                                                                            | <p>We operate in line with our policy which states <i>‘The raising of a complaint will not stop the councils’ efforts to address the service request.’</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 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 | <p>Introductory script (page one) of our <a href="#">Tenant Perceptive Survey template</a>.</p> <p>SBC’s Housing Transactional Survey guidance</p> | <p>The survey script states <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 <a href="https://www.stevenage.gov.uk/have-your-say/compliments-and-complaints">https://www.stevenage.gov.uk/have-your-say/compliments-and-complaints</a>.</i></p> <p>Transactional survey guidance included the requirement to include</p> |

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|  |  |  |  | <p>the following comment when conducting a survey:</p> <p><i>‘if dissatisfied or very dissatisfied selected, following message to appear: in line with the Complaint Handling Code 2024, an expression of dissatisfaction with services 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 <a href="http://www.stevenage.gov.uk">www.stevenage.gov.uk</a>.’</i></p> |
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## Section 2: Exclusions

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Comply: Yes / No | Evidence                                           | Commentary / explanation                                                                                                                                                              |
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| 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              | Section 6.1 – 6.8 of Complaints Policy (2026)      | If we do not accept a complaint, a detailed explanation will be provided to the residents and we highlight their right to take this decision to the Ombudsmen.                        |
| 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"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>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.</li> </ul> | Yes              | Section 6.3, 6.6 & 6.8 of Complaints Policy (2026) | <i>Following Recommendation 1 from the Housing Ombudsman Service, we reviewed and amended our policy to clarify our approach to handling complaints relating to insurance claims.</i> |

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|     | <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>                                                                                                                                                                                                                                                        |     |                                                                                             |                                                                                                                                                                                                                                                                                                                  |
| 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 | Section 6.3 of Complaints Policy (2026) and Appendix A – Making and Escalating a Complaint. | <i>Following Recommendation 2 from the Housing Ombudsman Service we have amended Appendix A – Making and Escalating a Complaint, to clarify that a complaint should be made 'within 12 months of when the issue happened, or within 12 months of when you first became aware of it' as cited in section 6.3.</i> |
| 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 | Section 6.4 of Complaints Policy (2026)                                                     | If a complaint is not accepted as per the exclusions set out in s. 6.8, a detailed written explanation will be provided along with highlighting their right to take the decision to the Ombudsmen.                                                                                                               |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.                                                                                                                                                                                                                                             | Yes | Section 6.3 - 6.8 Complaints Policy (2026)                                                  | All complaints are triaged by our Strategic Complaints Team ensuring consistency.                                                                                                                                                                                                                                |

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|  |  |  |  | We do not apply blanket exclusions and each complaint is considered on its individual circumstances. |
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### Section 3: Accessibility and Awareness

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                                                                                                                                             | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 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              | Section 4, 6.17 AND Appendix A Complaints Policy (2026)<br><a href="#">Equality, Diversity and Inclusion Policy</a><br><a href="#">Reasonable Adjustments Policy</a> | <p>We provide a range of accessible channels through which a complaint can be made:</p> <ul style="list-style-type: none"> <li>• Via our website</li> <li>• Through an Online My Stevenage account</li> <li>• By telephone</li> <li>• In writing</li> <li>• In person</li> <li>• Through a third party (e.g. an elected member, advocate service, or family member)</li> </ul> <p>Residents who do not have access to telephone or online services can visit our offices to use a council computer or book an appointment with an advisor.</p> <p>We have several policies that set out our approach to</p> |

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|     |                                                                                                                                                                                                                                                |     |                                              | <p>ensuring equal access to services. Our Complaints Policy was subject to an Equality Impact Assessment, carried out during its development and considered at the approval stage.</p>                                                                                                                                                                                                                                                                                                                                                                               |
| 3.2 | <p>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.</p> | Yes | <p>Section 6.10 Complaints Policy (2026)</p> | <p>Council officers are aware of a customer's right to raise a complaint directly through them, and updated guidance has been issued to support the process for logging complaints within the new system, ensuring all complaints are consistently recorded. Complaint volumes received via officers and service teams are monitored to identify trends and target training where required. This insight is regularly shared and reinforced with service leads through our Complaints Clinics, supporting continuous improvement in complaint handling practice.</p> |

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| 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 Complaints Policy (2026)</p> <p>Annual Complaints Performance and Service Improvements Report</p> | <p>As a Council, we recognise that complaints provide a valuable opportunity to improve services and to put things right for our residents.</p> <p>We convene monthly Complaints Clinics which focus on learning from complaints, identifying service improvements, and bringing together service leads to agree approaches to complex cases and share best practice.</p> <p>While we do not view high or low complaint volumes in isolation as a measure of success, we actively analyse complaint data, including benchmarking against peer organisations, to better understand our performance.</p> <p>Our most recent benchmarking indicates higher complaint volumes compared to national median averages published by Housemark. We are committed to understanding</p> |

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|     |                                                                                                                                                                                                                                                                                         |     |                                                                           | <p>this position, including exploring whether lower volumes reported elsewhere reflect differences in accessibility or reporting practices, and to ensuring that our own volumes are indicative of a well-publicised and accessible complaints process.</p>                                                                                                                                                                                                                                                                                |
| 3.4 | <p>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.</p> | Yes | <p>Our Complaints Policy is published on our <a href="#">website</a>.</p> | <p>Our website includes a dedicated Compliments and Complaints section, with our policy written in plain English. It sets out our two-stage process, including what customers can expect and the relevant timescales.</p> <p>Following <i>Recommendation 3</i> from the Housing Ombudsman Service, we have strengthened our policy to confirm that requests for alternative formats will be considered. While this was already referenced on the covering page, it has now also been included in section 6.17 (Reasonable Adjustments)</p> |

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|     |                                                                                                                                                                                          |     |                                                                                         | to improve visibility and clarity.                                                                                                                                                                                                                          |
| 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 | Section 6.18.1 & 6.18.4 Complaints Policy (2026)                                        | Our policy confirms that the Council's website publicises our complaints policy and process, alongside information on the role of Ombudsmen in housing complaints, the Housing Ombudsman Service's Complaint Handling Code, and our annual self-assessment. |
| 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 | Section 6.5 Complaints Policy (2026) and Appendix A – Making and Escalating a Complaint | All complainants have the right to be represented or accompanied by a person of their choice at any meeting with the Council. This is captured in our Complaints Policy and further highlighted in the summary information available on the website.        |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the                                                                             | Yes | Section 3.6 & 6.15 Complaints Policy (2026) and Appendix A –                            | Information about the Ombudsman is also publicised on our website                                                                                                                                                                                           |

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|  | individual can engage with the Ombudsman about their complaint. |  | Making and Escalating a Complaint | <p>within the summary content on our Compliments and Complaints page.</p> <p>Our Customer Service Centre and Complaints Team are trained to support residents in identifying the appropriate Ombudsman service for their complaint.</p> <p>This information is also clearly provided in correspondence at each stage of the complaints process.</p> |
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## Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                                             | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 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              | Strategic Complaints Team structure<br><br>Relevant job descriptions | <p>The Council maintains a dedicated Strategic Complaints Team responsible for the management and oversight of housing complaints.</p> <p>Strategic Complaints Managers independently investigate complaints, coordinate responses, liaise with service areas and act as the primary point of contact for customers and the Housing Ombudsman Service.</p> <p>The Senior Strategic Complaints Manager additionally oversees complaint performance reporting and ensures complaints are reported through the Council's governance arrangements including the Member Responsible for Complaints</p> |

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|     |                                                                                                                                                                                                                                       |     |                                                                                                     | (MRC), Cabinet and senior leadership teams.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 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 | Strategic Complaints Team structure<br><br>Relevant job descriptions<br><br>Governance arrangements | Strategic Complaints Managers have direct access to officers and managers across all levels of the organisation, including Heads of Service, Directors, Strategic Directors and the Member Responsible for Complaints.<br><br>Monthly Housing Complaints Clinics provide an established route for escalation of complex cases, review of service failings and agreement of corrective actions. This ensures complaint handlers have the authority, visibility and support required to resolve complaints fairly and promptly. |
| 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 | Yes | Complaints Policy (2026)<br><br>Complaints Clinics<br><br>Staff guidance and training materials     | The Council is committed to maintaining a positive complaint handling culture and views complaints as a valuable source of learning and service improvement.                                                                                                                                                                                                                                                                                                                                                                  |



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|  | core service and must be resourced to handle complaints effectively |  |  | <p>Dedicated complaint handling resources are in place within Housing to ensure compliance with the Complaint Handling Code.</p> <p>Training, guidance and regular engagement sessions are provided to service areas, with learning from complaints routinely shared through Housing Complaints Clinics and management forums.</p> <p>The Housing Ombudsman Service's recent policy review further strengthened our approach, and a programme of implementation activity has been undertaken to ensure policy updates are embedded into operational practice.</p> |
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## Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 (2026)                     | <p>The Council operates a single corporate Complaints Policy covering housing complaints aligned with the requirements of this code.</p> <p>All residents are treated consistently regardless of if and how a complaint is made.</p>                                                                                                                                                   |
| 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 | Section 6.12 Complaints Policy (2026)        | <p>Our policy provides a clear two-stage complaints process and does not include any informal complaint stage or additional escalation stages. Where issues can be resolved quickly, officers seek to do so at the earliest opportunity, however, expressions of dissatisfaction meeting the complaint definition are formally recorded and managed in accordance with the policy.</p> |
| 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 | Section 6.12 & 6.13 Complaints Policy (2026) | <p>The Council operates a two-stage complaints process only. Stage 2 represents the Council's final complaint response before referral to</p>                                                                                                                                                                                                                                          |

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|     |                                                                                                                                                                                                                                                                                   |     |                                                    | the Housing Ombudsman Service.                                                                                                                                                                                                                                                                    |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes | Contract management arrangement                    | Where complaints relate to contractors or third-party providers acting on behalf of the Council, the complaint remains the responsibility of the Council and forms part of our two-stage complaints process.<br>Residents are not required to pursue separate complaint procedures.               |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                            | Yes | Contract management arrangement                    | The Council remains accountable for complaints relating to services delivered on its behalf. Strategic Complaints Managers oversee complaint handling and ensure all complaint responses are Code compliant regardless of whether service delivery is undertaken directly or through contractors. |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the                                                                                                                                                                  | Yes | Section 6.12.1 and 6.13.1 Complaints Policy (2026) | <i>Following Recommendation 4 from the Housing Ombudsman Service, we</i>                                                                                                                                                                                                                          |

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|     | 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. |     | Complaint acknowledgement templates                                                                  | <p><i>have updated our policy to improve clarity around what customers can expect to see included in their written complaint acknowledgement and strengthen requirements around complaint definitions.</i></p> <p>Acknowledgement correspondence at both Stage 1 and Stage 2 continues to set out the Council's understanding of the complaint and the outcomes sought by the resident.</p> <p>Where any aspect is unclear, clarification is sought before the investigation proceeds.</p> |
| 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 | <p>Section 6.12.1 and 6.13.1 Complaints Policy (2026)</p> <p>Complaint acknowledgement templates</p> | <p><i>Following Recommendation 4 from the Housing Ombudsman Service, we have updated our policy to clarify that our acknowledgements confirm which aspects of the complaint the council is responsible for investigating</i></p>                                                                                                                                                                                                                                                           |

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|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |     |                                                                                                                        | and provide signposting for those that fall outside of its responsibility.                                                                                                                                                                                                           |
| 5.8  | <p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes | <p>Complaints Procedure</p> <p>Staff guidance and training materials</p> <p>Strategic Complaints Team arrangements</p> | Complaints are investigated on their merits by appropriately trained Strategic Complaints Managers who act independently and consider all relevant information and evidence before reaching a decision.                                                                              |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.                                                                                                                                                                                                                                              | Yes | Section 6.12.4 and 6.13.4 Complaints Policy (2026)                                                                     | Following Recommendation 5 from the Housing Ombudsman Service, our policy now clarifies that where complaints exceed the standard timescales and any permitted extensions, suitable intervals for updates will be agreed with residents and maintained throughout the investigation. |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act                                                                                                                                                                                                                                                                                                                                                 | Yes | Section 6.17 Complaints Policy (2026)                                                                                  | Reasonable adjustments are recorded and kept under review. Information                                                                                                                                                                                                               |

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|      | 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.                                                                              |     | Reasonable Adjustments Policy                                        | regarding disabilities, vulnerabilities and agreed support arrangements is maintained appropriately to ensure residents receive accessible services.                                                                                                          |
| 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 | Section 6.6 to 6.8, 6.12.6, 6.13.5 and 6.15 Complaints Policy (2026) | Complaints are only refused escalation where a valid exclusion applies. Decisions are explained in writing and residents are advised of their right to approach the Housing Ombudsman Service.                                                                |
| 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 | GovMetric Case Tracker system                                        | All housing complaints are managed through the GovMetric Case Tracker system, which records complaint details, correspondence, supporting evidence, responses and agreed actions. The system provides a full audit trail and supports performance monitoring. |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any of its complaints process. Landlords must ensure                                                                                                                                                        | Yes | Section 6.12.6, 6.13.5 and 6.16 Complaints Policy (2026)             | Remedies may be offered at any stage of the complaints process without requiring escalation. This can include                                                                                                                                                 |

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|      | appropriate remedies can be provided at any stage of the complaints process without the need for escalation.                                                                                                                                                            |     |                                                                                   | apologies, service improvements, corrective actions, compensation and other appropriate measures.                                                                                                                                                                                        |
| 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 | Section 6.19 Complaints Policy (2026)<br><br>Unacceptable Behaviour Policy (2022) | The Council has an established policy for managing unacceptable behaviour. Any restrictions are fully documented, justified and reviewed regularly.                                                                                                                                      |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.                                                                                                              | Yes | Unacceptable Behaviour Policy (2022)                                              | Our Unacceptable Behaviour Policy was subject to an Equality Impact Assessment, carried out during its development and considered at the approval stage.<br><br>Any restrictions are proportionate, evidence-based and take account of Equality Act duties and individual circumstances. |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                        | Comply: Yes / No | Evidence                     | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 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              | Complaint Handling Procedure | <p>All complaints are triaged upon receipt to determine the most appropriate handling approach. At the point of triage, complaint complexity, customer vulnerability and potential risk are considered. Where a resident has disclosed a vulnerability, or where the complaint relates to a health and safety matter, the complaint is flagged to the relevant Strategic Complaints Manager to ensure appropriate prioritisation and oversight.</p> <p>This approach helps ensure that straightforward complaints can be resolved promptly, whilst more complex or higher-risk cases receive the additional investigation, oversight and</p> |



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|     |                                                                                                                                                                                                                                                                                                                                   |     |                                                                             | support required without unnecessary delay.                                                                                                                                                                          |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>                                                                                                                                                                | Yes | Section 6.12 Complaints Policy (2026)                                       | Following Recommendation 6 from the Housing Ombudsman Service, our policy now explicitly confirms that complaints will be acknowledged, defined and logged within five working days of the complaint being received. |
| 6.3 | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                              | Yes | Section 6.12 Complaints Policy (2026)                                       | A full written response is issued within the following 10 working days of a complaint being acknowledged.                                                                                                            |
| 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 | Section 6.12.4 Complaints Policy (2026)<br><br>Complaint Handling Procedure | Explicitly stated in our policy and reinforced in our procedure, to ensure extensions are not implemented unless absolutely necessary.                                                                               |
| 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 | Section 6.12.4 Complaints Policy (2026)                                     | Explicitly stated in our policy.                                                                                                                                                                                     |

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| 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 | Section 6.12.6 Complaints Policy (2026)                                                                                  | Following Recommendations 7 and 8 from the Housing Ombudsman Service, our Complaints Policy now makes clear that responses are issued once the outcome of the investigation is known, rather than waiting for all agreed actions to be completed. The Council maintains a Complaints Action Tracker which records actions, ownership and deadlines, and residents receive updates regarding outstanding actions until completion. |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.                                                                                                       | Yes | Section 6.12.6 Complaints Policy (2026)<br><br>Complaint Handling Procedure<br><br>Staff guidance and training materials | The structure and content of our complaint responses are set out within the Complaints Policy. Our complaint handling procedure and supporting staff guidance further promote best practice, ensuring decisions are clearly explained and supported by appropriate evidence, with reference to relevant policies, legislation                                                                                                     |

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|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |                                         | and good practice where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 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 | Section 6.14 Complaints Policy (2026)   | Captured within our policy and our position mirrors the expectations of the code.                                                                                                                                                                                                                                                                                                                                                                           |
| 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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes | Section 6.12.6 Complaints Policy (2026) | Our policy confirms that complaint responses will be provided in writing and include all elements set out in a. – g. of the Code.<br><br>We are committed to communicating in clear, plain English and regularly review our templates, guidance and correspondence against best practice to improve accessibility. We recognise that literacy levels within our Borough are varied and therefore seek to present information, decisions and next steps in a |

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|  |  |  |  | straightforward and easy-to-understand format. |
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| Code provision | Code requirement                                                                                                                                                                                   | Comply: Yes / No | Evidence                                       | Commentary / explanation                                                                                                                                                                                                                                                                                                                |
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| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response. | Yes              | Section 6.13 Complaints Policy (2026)          | Captured within our policy with confirmation that Stage 2 is the final response stage.                                                                                                                                                                                                                                                  |
| 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              | Section 6.13 & 6.13.1 Complaints Policy (2026) | Following Recommendation 9 from the Housing Ombudsman Service, our policy now explicitly confirms that requests for Stage 2 review will be acknowledged, defined and logged within five working days. Acknowledgement correspondence includes our understanding of the complaint, the issues under review and the target response date. |
| 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             | Yes              | Section 6.13.1 Complaints Policy (2026)        | Residents are not required to provide justification when requesting escalation. Our policy states that, where any aspect of the escalation is unclear, the Council will                                                                                                                                                                 |

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|      | unhappy as part of its stage 2 response.                                                                                                                                                                                                                                                                                          |     |                                                                                      | contact the resident to seek clarification.                                                                                                                                                                                                                                                                   |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.                                                                                                                                                                                                             | Yes | Section 6.13.2 Complaints Policy (2026)                                              | Our policy confirms that at Stage 2, the complaint will not be considered by the same officer who considered the Stage 1 complaint.                                                                                                                                                                           |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                    | Yes | Section 6.13 Complaints Policy (2026)                                                | A full written response is issued within the following 20 working days of the complaint being acknowledged.                                                                                                                                                                                                   |
| 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 | Section 6.13.3 & 6.13.4 Complaints Policy (2026)<br><br>Complaint Handling Procedure | Following Recommendation 10 from the Housing Ombudsman Service, references to Stage 2 extensions in our policy have been clarified to ensure consistency with the working day requirements set out within the Complaint Handling Code.<br><br>These working day requirements are reinforced in our procedure. |
| 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 | Section 6.13.3 Complaints Policy (2026)                                              | Explicitly stated in our policy.                                                                                                                                                                                                                                                                              |

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| 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 | Section 6.13.5 Complaints Policy (2026)                                                                                  | Following Recommendations 11 and 12 from the Housing Ombudsman Service, our Complaints Policy now makes clear that Stage 2 responses are issued once the outcome of the investigation is known, rather than waiting for all follow-up actions to be completed. Outstanding actions are monitored through the Complaints Action Tracker and residents are updated until completion. |
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.                                                                                                       | Yes | Section 6.13.5 Complaints Policy (2026)<br><br>Complaint Handling Procedure<br><br>Staff guidance and training materials | The structure and content of our complaint responses are set out within the Complaints Policy. Supporting procedures, guidance and training materials reinforce the requirement to address all elements of the complaint definition, provide a clear rationale for decisions, and reference relevant policy, legislation and good practice where appropriate.                      |

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| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Section 6.13.5 Complaints Policy (2026) | Our policy confirms that our response to a Stage 2 complaint will be in writing and include elements a.- g. of the code. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                    | Yes | Section 6.13 Complaints Policy (2026)   | Our policy confirms that Stage 2 is our final response and that these reviews are conducted by a senior manager.         |

## Section 7: Putting things right

| Code provision | Code requirement                                                                                                                                                          | Comply: Yes / No | Evidence                              | Commentary / explanation                                                                                                      |
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| 7.1            | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: | Yes              | Section 6.16 Complaints Policy (2026) | The 'Remedy and Compensation' section of our policy lists the actions the council may take to put things right when something |

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|     | <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> |     |                                                                                                                          | has gone wrong. This list of remedies mirrors the code.                                                                                                                                           |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.                                                                                                                                                                                                                                                                                                                                                         | Yes | Section 6.16.1 Complaints Policy (2026)<br><br>Complaint Handling Procedure<br><br>Staff guidance and training materials | We will work with the complainant to identify a suitable remedy, taking account of the impact experienced and relevant Ombudsman guidance.                                                        |
| 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 | Section 6.16.1 Complaints Policy (2026)<br><br>Complaint Handling Procedure                                              | Any remedy offered sets out the actions to be taken, ownership and timescales for completion. Progress is monitored through our Complaints Action Tracker to ensure agreed actions are delivered. |



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| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Section 6.16.1 Complaints Policy (2026) | When determining remedies, the Council considers the Housing Ombudsman's Remedies Guidance together with the circumstances and impact experienced by the resident. Learning from Ombudsman determinations is routinely reviewed through Complaints Clinics and incorporated into local practice. |
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## Section 8: Self-assessment, reporting and compliance

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Comply: Yes / No | Evidence                                                                                                                                                                                                          | Commentary / explanation                                                                                                              |
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| 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p>Section 6.18 Complaints Policy (2026)</p> <p>Our annual complaints performance and service improvement report is published on our <a href="#">website</a>, together with other key complaints information.</p> | <p>Each year, we publish an annual report that captures all of the elements listed in section 8.1 of the Complaint Handling Code.</p> |

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| 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 | <p>Section 6.18 Complaints Policy (2026)</p> <p>Our annual complaints performance and service improvement report is published on our <a href="#">website</a>, together with other key complaints information, including the governing body's response to the report.</p> | Our annual complaints performance and service improvement report will be presented to the Council's Executive, Overview & Scrutiny Committee and at our Cooperative Neighbourhood Resident's Meetings for scrutiny and challenge.                                                                                                      |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.                                                                                                                                                                    | Yes | Self-assessment against the Complaint Handling Code reviewed as necessary and published on our website.                                                                                                                                                                  | Self-assessments 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 provided to the Ombudsman as necessary following investigation outcomes.                                                                                                                                                                                        | <p>We will review and update the self-assessment to comply with any recommendations or orders from the Ombudsman.</p> <p>This self-assessment reflects the outcome of the Housing Ombudsman Service's 2026 policy review and demonstrates how the Council has responded to and implemented each of the recommendations identified.</p> |

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| 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 available at the request of the Ombudsman. | The Council's Business Continuity arrangements for Housing and Customer Services include notifying the Housing Ombudsman and residents as necessary Updates will be published, along with expected timelines for returning to normal operations. |
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## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement                                                                                                                                                                                                                               | Comply: Yes / No | Evidence                                      | Commentary / explanation                                                                                                                                                                                                                                                                                                                                    |
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| 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              | Section 6.18 Complaints Policy (2026)         | Learning arising from complaints, Ombudsman determinations and the Housing Ombudsman Service's policy review is monitored through our Housing Complaints Clinics and embedded through service improvement actions.                                                                                                                                          |
| 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              | Section 1.2 and 6.18 Complaints Policy (2026) | As a council we recognise that complaints provide us with an opportunity to improve and this is captured in our policy.<br><br>We take a positive approach to learning from complaints and regularly hold focussed case review meetings to identify issues and use the Housing Complaints Clinic to convert learning into strategic and operational change. |

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| 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 | Section 1.2 and 6.18 Complaints Policy (2026) | 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. Our annual report, which is shared with residents, captures our achievements and commitments, which are feedback led. |
| 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 | Section 6.18 Complaints Policy (2026)         | Strategic accountability for complaints sits with the Strategic Director responsible for Housing. Complaint performance, trends, lessons learned and potential systemic issues are regularly reviewed and reported through established governance arrangements.                                                                       |
| 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 | Section 6.18.3 Complaints Policy (2026)       | Stevenage Borough Council has appointed the Cabinet Member for Housing as the Member Responsible for Complaints (MRC), in                                                                                                                                                                                                             |

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|     | Responsible for Complaints ('the MRC').                                                                                                                                                                                                                                                                                                                                                                                                             |     |                                               | accordance with the Complaint Handling Code.                                                                                                                                                                                                                                                                                                                           |
| 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 | Section 2 and 6.18.3 Complaints Policy (2026) | Complaint handling performance is included in the Council's Corporate Performance Framework, which is captured in the quarterly report presented to Cabinet. This report is considered by the Council's Strategic Leadership Team which includes the Chief Executive and Monitoring Officer, as well as the Cabinet, including 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"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</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</li> </ul> | Yes |                                               | In addition to quarterly performance reporting to Cabinet, the Member Responsible for Complaints receives updates through Housing Complaints Clinics, annual reporting arrangements and oversight of Housing Ombudsman determinations, including progress against any recommendations, orders or improvement actions.                                                  |

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|     | orders related to severe maladministration findings; and<br>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>Annual staff objective setting</p> <p>Strategic Complaints Management team resource</p> <p>Established governance structure</p> | <p>Our Strategic Complaints Managers lead by example and provide support across all housing service areas, helping to ensure a consistent and proactive approach to complaint handling.</p> <p>Expectations relating to collaborative working, accountability and customer focus are embedded through annual objective setting and reinforced through our governance arrangements and Housing Complaints Clinics. We recognise that the issues raised through complaints are often cross-cutting in nature and require teams to work together to identify solutions, learn from outcomes and deliver service improvements for residents.</p> |



