



Finance, Resources, Audit and Governance Committee
26 July 2024

CUSTOMER COMPLAINTS PERFORMANCE

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Portfolio: Housing and Communities

Wards Affected: All

Purpose of the Report:

To provide results of the Housing Ombudsman self-assessment report required by new legislation.

Recommendations:

1. The Committee to take note of the performance and agree for it to be published and submitted to the Housing Ombudsman for consideration.

1. Summary

- 1.1 In September the Council became a Register provider (RP). As well as many benefits to this, this also brings additional regulations that the Council must adhere to, to ensure it demonstrates good performance in supporting vulnerable residents.
- 1.2 In March 2024 the Council agreed the Housing Complaints Policy. This made sure that the Council had taken the appropriate action as per the Housing Ombudsman new complaints handling code.
- 1.3 As an RP the Council must comply with the Ombudsman's Statutory Complaint Handling Code "the Code". As an RP the Council must assess against the Code and assure policies and practices comply with the Code at least annually.
- 1.4 The self-assessment also requires landlords to evidence how they comply with the Code and where they do not what action will be taken.

2. Background

- 2.1 The Social Housing (Regulation) Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints. It also placed a duty on the Ombudsman to monitor compliance with a code of practice that it has issued.
- 2.2 The Ombudsman consulted on the Complaint Handling Code (the Code) and the intended approach to the duty to monitor in late 2023. The statutory Code took effect from 1 April 2024 and their duty to monitor compliance commenced at the same time.
- 2.3 The Scheme sets out the power and steps that the Ombudsman can take if a landlord is failing to comply with their membership obligations. One of these steps is to issue, and publish, a Complaint Handling Failure Order (CHFO).
- 2.4 Where a landlord is unable to comply with the Code due to exceptional circumstances that have led to business continuity plans being enacted, such as a cyber incident, the landlord must inform the Ombudsman of its reasons, provide information to residents who may be affected and publish this on their website. The landlord must provide all parties with a timescale for returning to compliance with the Code and the reasonableness of exemptions to the Code during this period may be assessed by the Ombudsman.

3. Current positions/findings

- 3.1 In order to measure performance, the Housing Ombudsman has provided a self-assessment document.

- 3.2 The purpose of the self-assessment is to demonstrate the Council's housing complaint handling service and how it complies with the provisions of the Code.
- 3.3 The self-assessment must cover all services that are delivered either directly or indirectly by the Council in their capacity of a landlord. This includes any services delivered by a third-party, such as a contractor, managing agent or another social landlord.
- 3.4 In completing the self-assessment, the Council must provide evidence of its compliance, or what action it will be taking to address any non-compliance, with the provisions of the Code within the assessment. By setting out clearly how we comply with each provision, we can demonstrate that we are being open and accountable to our residents.
- 3.5 Where we are unable to comply with a provision of the Code, an explanation must be provided detailing any mitigations or alternative approaches we are taking, and how this fulfils the intentions of the Code. We must also provide dates for achieving compliance where appropriate. Any non-compliance and justifications can be found within the assessment in appendix 1.
- 3.6 Self-assessments must be completed annually and submitted to the Ombudsman. However, it is envisaged that we should expect to review and make changes to our complaints policy or processes more frequently, such as in the event of significant organisational restructures or in response to an order by the Ombudsman.
- 3.7 If a landlord reviews and updates its self-assessment before the annual submission is required, they must inform the Ombudsman by re-submitting their assessment.
- 3.8 Appendix 1 provides the completed self-assessment for the Council. The Council currently complies with most of the requirements. Where the Council falls short is due to the differing time frames between the Local Government Ombudsman and the Housing Ombudsman. The Local Government Ombudsman intend to release complimentary guidance regarding complaints processing to be enacted by October 2024. This will bring much greater alignment. At the time of the guidance being released Council officers challenged the Housing Ombudsman however this was rebutted.
- 3.9 With over 80 services in the Council, it is not sensible to realign all complaints processing, as the housing guidance is often unsuitable for aspects outside housing. To mitigate any concerns those who are likely to have housing concerns raised with them have been provided relevant training. This does however not meet the requirement to have all officers suitably trained. This is reflected within the assessment where relevant time frames to address this concern are detailed.

4. Proposed action

- 4.1 For the Finance, Resources, and Audit Governance Committee to endorse the current performance and agree to its publication and submission as required by the Ombudsman guidance.

5. Other options

- 5.1 To do nothing places the Council at risk, as we will not be fulfilling our duty as an RP.

6. Issues and risks

- 6.1 Failure to comply will place the Council at significant risk, both reputationally and financially.
- 6.2 **Resource Implications** – There are no current resource implications. The temporary accommodation purchase business case provided resource of 1 grade C officer for every 10 properties purchased. This is not limited to frontline support but also administrative support. This increase in resource has allowed the team to meet the additional resource need.
- 6.3 **Legal Implications** – Failure to adhere will place the Council at risk of legal challenge, not only from the Ombudsman but also our residents were issues to be found.
- 6.4 **Equality Implications** – Complying to the recommendations ensures that the Council meets all its equality impact considerations.
- 6.5 **Environmental Impact** – Key to the complaints reporting is to make sure we as a Council are performing when any repair requests are received. By performing within the required code time frames, we will be making sure that our residents' home or placement environment remains safe and suitable. This is, therefore, making sure the Council mitigates any health risks that may occur from poor quality accommodation, for example, damp conditions.
- 6.6 **Crime and Disorder** – There are no impacts upon crime and disorder.

7. Conclusion

- 7.1 The proposed process meets all legal requirements and recommendations that we must adhere to as an RP. By taking the action the Council will comply with the Ombudsman's Statutory Complaint Handling Code. Members are therefore asked to take note of the Council's performance as an RP and agree to publish and submit.

8. Recommendations

- 8.1 The Committee to take note of the performance and agree for it to be published and submitted to the Housing Ombudsman for consideration.

Background papers

None

Appendix 1

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 complaint's 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.

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	Housing conditions – Broadland and South Norfolk (southnorfolkan.broadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the heading 'Definition of a complaint'
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkan.broadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the

	landlords must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.		dbroadland.gov.uk)	heading 'Definition of 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 be recorded, monitored and reviewed regularly.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkanbroadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the heading 'Definition of a service request
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	Housing conditions – Broadland and South Norfolk (southnorfolkanbroadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the heading 'Definition of a service request
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	In progress		Within our tenant satisfaction measures survey we will be including a link to the complaints policy and links to make a complaint. This is due to be

	wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			published by March 25
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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	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the heading ‘Exclusions’
2.2	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: 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	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	This is defined within the Housing Complaints Handling Policy under the heading ‘Exclusions’

	<p>and Particulars of Claim, having been filed at court.</p> <p>Matters that have previously been considered under the complaints policy.</p>			
2.3	<p>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.</p>	Yes	<p>Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)</p>	<p>This is defined within the Housing Complaints Handling Policy under the heading ‘Exclusions’</p>
2.4	<p>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.</p>	Yes	<p>Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)</p>	<p>This is defined within the Housing Complaints Handling Policy under the heading ‘Exclusions’</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual</p>	Yes	<p>Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)</p>	<p>This is defined within the Housing Complaints Handling Policy under the heading ‘Exclusions’</p>

	circumstances of each complaint.			
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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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	We will accept a complaint via all channels of communication as defined on our Housing Complaints webpage.
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.	In progress	south-norfolk-housing-complaint-handling-code (southnorfolkandbroadland.gov.uk)	By the end of June 2024, the Housing Complaints Policy will be shared with all members of the Housing Team. In October 2024, we will be releasing a singular complaints policy to cover all corporate complaints. All staff will have training on the new policy and understand

				the process of complaint handling by the end of October 2024.
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		We have and continue to build a positive complaints culture, ensuring that we learn lessons from each complaint received.
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 time frames for responding. The policy must also be published on the landlord's website.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkanorfolk.gov.uk)	The complaints policy is available to download from our website and details the two-stage process.
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	Housing conditions – Broadland and South Norfolk (southnorfolkanorfolk.gov.uk)	The policy and Housing Ombudsman details and Code are publicised here.
3.6	Landlords must give residents the opportunity to have a representative deal	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkanorfolk.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading 'Definition of a complaint'

	with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		ndbroadland.gov.uk	
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.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkanhbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading 'Next Steps'

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		The Customer Experience and Insight Lead has overall responsibility for reporting on complaints and corporate oversight of complaints. The Executive Assistants are responsible for coordinating complaints in their service area and liaising with the Ombudsman on complaints within their areas.
4.2	The complaints officer must have access to	Yes		The Executive Assistants are

	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.			<p>responsible for coordinating complaints in their service area and ensuring timely resolution of complaints.</p> <p>The Customer Experience and Insight Lead has corporate oversight of complaints to assist in ensuring they are resolved promptly and fairly.</p>
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		<p>We have and continue to build a positive complaints culture.</p> <p>By end of October 2024, our complaint handlers will have refresher training on complaint handling.</p>

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	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkand	We have a single complaints policy covering complaints relating

	treated differently if they complain.		broadland.gov.uk)	to properties we own as a landlord.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk))	Our policy states that we have a two stage complaints process.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk))	Our policy states that we have a two stage complaints process.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk))	Our policy states within our complaint definition that we deal with any third parties as part of the two stage complaint handling process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk))	Our policy states within our complaint definition that we deal with any third parties as part of the two stage

				complaint handling process. Where a complaint involved a third party, we would be the lead on the complaint ensuring that it followed our complaints policy and process.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading ‘The complaints handling process’
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading ‘The complaints handling process’
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 	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading ‘The complaints handling process’

	perceived conflict of interest; and d. consider all relevant information and evidence carefully.			
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the heading ‘The complaints handling process’
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	equality-and-diversity-policy (southnorfolkandbroadland.gov.uk)	This is covered by the corporate Equalities policy
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
5.12	A full record must be kept of the complaint,	Yes		All complaints are logged on our

	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.			corporate complaints system and relevant documentation is uploaded to each record.
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		Within our internal complaints handling process we encourage early communication with the complainant to prompt early resolution to prevent the need for escalation.
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		This is covered under our internal unreasonably persistent complainant's policy.
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	equality-and-diversity-policy (southnorfolkandbroadland.gov.uk)	This is covered under our corporate Equalities policy.

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		Within our internal complaints handling process we encourage early communication with the complainant to prompt early resolution.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.

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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.
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	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance and internal processes and guidance.

	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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 1 guidance.

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.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance and internal processes and guidance.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.

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	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
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	Housing conditions – Broadland and South Norfolk (southnorfolkand broadland.gov.uk)	Defined within the Housing Complaints Handling Policy under the Stage 2 guidance.
6.19	Landlords must confirm the following in writing to the resident at the	Yes	Housing conditions – Broadland and	Defined within the Housing Complaints

	<p>completion of stage 2 in clear, plain language:</p> <p>a. the complaint stage;</p> <p>b. the complaint definition;</p> <p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>		South Norfolk (southnorfolkandbroadland.gov.uk)	<p>Handling Policy under the Stage 2 guidance.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	<p>Defined within the Housing Complaints Handling Policy under the Stage 2 guidance and internal processes and guidance.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; 	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	<p>Defined within the Housing Complaints Handling Policy under 'Putting things right'.</p>

	<ul style="list-style-type: none"> • 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	Housing conditions – Broadland and South Norfolk (southnorfolkan.gov.uk)	Defined within the Housing Complaints Handling Policy under 'Putting things right'.
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	Housing conditions – Broadland and South Norfolk (southnorfolkan.gov.uk)	Defined within the Housing Complaints Handling Policy under 'Putting things right'.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Housing conditions – Broadland and South Norfolk (southnorfolkan.gov.uk)	Defined within the Housing Complaints Handling Policy under 'Putting things right'.

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>Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)</p>	<p>Defined within the Housing Complaints Handling Policy under 'Self-assessment, reporting and compliance'.</p>
8.2	<p>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</p>	Yes	<p>Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)</p>	<p>Defined within the Housing Complaints Handling Policy under 'Self-assessment, reporting and compliance'.</p>

	relating to complaints. The governing body's response to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	In progress	Housing conditions – Broadland and South Norfolk (southnorfolkandbroadland.gov.uk)	<p>Defined within the Housing Complaints Handling Policy under 'Self-assessment, reporting and compliance'.</p> <p>We are planning to implement a single complaints policy to cover corporate complaints using the Codes from the Ombudsman and will re-do our self-assessment if this is agreed and in place in October 2024.</p>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will do this if we have any updates to make following the Ombudsman investigation.
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.	In progress		We will look to include this within our internal processes by end of October 2024

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	broadland-district-council-complaints-policy (southnorfolkand broadland.gov.uk)	<p>We continue to build a positive complaints culture, ensuring that we learn lessons from each complaint received.</p> <p>We have a lessons learned process that we encourage to be followed.</p>
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.	In progress		<p>Training officers within the Housing Team are fully cognisant of any learning.</p> <p>All complaint handlers will be attending complaint handling training by the end of October 2024.</p>
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	Yes		<p>Complaint volumes are reported to our senior leadership team. Complaint volumes will also be reported to Members on an annual basis.</p>

	residents' panels, staff and relevant committees.			
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		Customer Experience and Insight Lead.
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 Responsible for Complaints ('the MRC').	Yes		Chair of Finance, Resources, Audit and Scrutiny Committee and Audit Committee
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		Yearly reporting to Finance, Resources, Audit and Scrutiny Committee and Audit Committee
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and	Yes		Yearly reporting to Finance, Resources, Audit and Scrutiny Committee and Audit Committee

	<p>outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
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>	In progress		We will look to add this into management objectives.