

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.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>This definition of a complaint is given in the Customer Feedback Guide (page 2), adopted from the Housing Ombudsman</p>
1.3	<p>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</p>	Yes	<p>"Who can make a complaint? A complaint may be made by:</p> <ul style="list-style-type: none"> • a person who is affected by our services. • an individual or organisation acting on behalf of someone (written consent is required) • an organisation that has been impacted by our services." <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>The Customer Feedback Guide makes clear that complaints can be submitted by a third party's representative</p>

	representative must be handled in line with the landlord's complaints policy.		www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide	
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	www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide https://www.sandwell.gov.uk/contact/log-complaint	This distinction is explained in the Customer Feedback Guide and online prior to a complaint being submitted.
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	<p>“A complaint will be raised if an individual expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing”</p> www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide	The Customer Feedback Guide states that a complaint will be raised where a customer is dissatisfied, even where the handling of the service request is continuing.

1.6	<p>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.</p>	Yes	<p>Transactional surveys include a details of how dissatisfied customers can make a complaint</p>	<p>Surveys sent out by the council signpost to the Complaints Policy.</p>
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>“A complaint will be accepted by the Council unless there is a valid reason not to do so”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	The Customer Feedback Guide sets out requests which will not be considered under the Complaints Policy.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such 	Yes	<p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	The Customer Feedback Guide gives examples of complaints that will not be managed under the Complaints Policy

	<p>as the Claim Form and Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy. 			
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>“Complaints must be made no later than twelve months after the date on which the matter occurred. If there are good reasons for not having made the complaint within the above time frame and, if it is still possible for the Council to investigate the complaint effectively and fairly, we may decide to still consider the complaint”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>Timescales for making a complaint are set out in the Customer Feedback Guide, and state that a complaint may still be considered outside of these timescales.</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</p>	Yes	<p>“When the council cannot consider a complaint under this policy, you will be advised and provided with any alternative options that may be available”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>A complaint will be accepted by the Council unless there is a valid reason not to do so. Each complaint is looked at individually and considered on its own merits. Where a complaint is not accepted, the reasons will be outlined and</p>

	Ombudsman may tell the landlord to take on the complaint.			any alternative routes for the complainant to take are signposted. This includes the right to take the decision to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	“A complaint will be accepted by the Council unless there is a valid reason not to do so.”	Each complaint is looked at separately and based on its own merits. Where there are mitigating circumstances and discretion can be shown, this is done.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	<p>Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.</p> <p>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.</p>	Yes	<p>https://www.sandwell.gov.uk/housing/reasonable-adjustments-policy</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>Complaints can be made through multiple channels, including face-to-face, over the telephone, online and in writing. Complaints can be accepted from third parties with consent.</p> <p>The Customer Feedback Guide also links to the Reasonable Adjustments Policy.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware	Yes	E-Learning for all Staff on 'Complaints Procedure' Complaints Guidance and Best Practice provided to all staff	All staff are able to accept a complaint in any format, assist a customer to make a

	of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.			complaint, and ensure it is logged to the relevant officer for a resolution
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>Housing Complaints Performance Sandwell Council</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>Data on Complaint volumes are regularly scrutinised to monitor trends, and ensure that complaints are received as expected. Any fluctuation in Complaint volumes would be analysed to ensure that Complaints are not being missed or overlooked.</p> <p>This data is made accessible to the public on the SMBC website.</p>
3.4	Landlords must make their complaint policy	Yes	www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide	The Complaints policy is

	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.			published on our website. The Corporate Complaints process is detailed within the Customer Complaints Guide, with the number of stages involved, what will happen at each stage and the timeframes for responding all detailed clearly in this Guide.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Housing Complaints Performance Sandwell Council</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	The Customer Feedback Guide gives information and contact details for the Ombudsman service.
3.6	Landlords must give residents the opportunity to have a representative deal	Yes	<p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	The Customer Feedback Guide details that complainants can

	with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.			have a third party act on their behalf, including attending meetings
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	<u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u>	<p>The Housing Ombudsman details are given in the Customer Feedback Guide.</p> <p>The Housing Ombudsman details are given in complaint responses at each stage of the complaints process.</p>

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		<p>SMBC have both a dedicated Customer Feedback Team and a Housing Resolutions Team specifically responsible for Housing Complaints and compliance with the Code.</p> <p>The Customer Feedback Team are responsible for Sandwell MBC complaints and report to Leadership Team and Cabinet throughout the year. They are also responsible for liaison with the Ombudsman.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes		Complaints Officers have access to all SMBC staff to provide prompt resolutions to customers. They have the authority and autonomy to resolve complaints.
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	Yes	E-Learning for all Staff on 'Complaints Procedure' Complaints Guidance and Best Practice provided to all staff	All staff are made aware of the importance of complaints and complaint handling. There is a dedicated Customer Feedback

	importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively			team as well as a Housing Resolutions team resourced to provide a dedicated complaints service. The Housing Resolutions team look to compile and share lessons learned, currently through regular stakeholder meetings where concerns and trends are discussed, and Improvement Panels following every Housing Ombudsman decision.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated	Yes	www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide	The Customer Feedback Guide details the single complaints policy in place. Residents are not treated differently or detrimentally following a complaint

	differently if they complain.			
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	<p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>E-Learning for all Staff on 'Complaints Procedure' Complaints Guidance and Best Practice provided to all staff</p>	The Complaints Policy has 2 stages with no informal stage. However, where customers are unhappy when they make contact with the Council all efforts will be made to resolve their issue at the first point of contact.
5.3	A process with more than two stages is not acceptable under any	Yes	www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide	The two stage complaints process is detailed in the Customer Feedback Guide

	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
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	Yes		Complaints are not handled by a third party.

	complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		Complaints are not handled by a third party.
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	Yes		All customers making a complaint are contacted at the first stage to discuss and clarify their concerns. Response letters include a 'Your Complaint' section, which sets out and details our understanding of the complaint.

	complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.			
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		When a complaint has been received, we set out to understand what the complaint is regarding, and what action the individual is seeking. If there is any ambiguity or information missing, the Complaints officer would make sure to go back to the complainant, or anyone representing them, and seek clarification, so

				that an informed decision can take place as to where the complaint can be allocated and resolved.
5.8	At each stage of the complaints process, complaint handlers must: 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;	Yes	E-Learning for all Staff on 'Complaints Procedure' Complaints Guidance and Best Practice provided to all staff	a. Complaints are handled on their own merits. The Customer Feedback team and the Housing Resolutions team sit independently of any department to provide impartial resolutions. b. All complainants are contacted when their complaint is received, and they are given the opportunity to detail their concerns.

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			<p>c. Where there are actual or perceived conflicts of interest another officer will be assigned to the investigation.</p> <p>d. All information given by the resident and held by the council are considered in the investigation.</p>
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	Yes	<p>“We will agree an extension to this timescale with the complainant if required.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	Residents are kept informed of any delay and new timescales are agreed. The reasons for the delay are discussed and justified.

	about their complaint.			
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.</p> <p>Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed.</p> <p>Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<p>https://www.sandwell.gov.uk/housing/reasonable-adjustments-policy</p>	<p>The Customer Feedback Guide links to the Reasonable Adjustments Policy.</p> <p>Complaint handlers discuss preferred methods of contact with complainants. Vulnerabilities and communication preferences for Tenants are held on their tenancy information.</p>
5.11	Landlords must not	Yes	"If the complainant is dissatisfied with the outcome of the Stage One response, they can request to escalate their complaint to Stage Two which	All requests for a Stage 2

	<p>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.</p>		<p>is the final stage of the complaints process. The complainant must specify the reasons for wanting to proceed to Stage Two. Simply stating that they are unhappy with the response received or just exercising the right to escalate to the next stage are not justified reasons to initiate a Stage Two investigation”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>complaint will be considered and not refused without valid reason.</p>
5.12	<p>A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date</p>	Yes		<p>All documentation relating to a complaint is held on the Open Housing system.</p>

	received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			
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	Yes	<p>“We will look to resolve the matter for you quickly and without the need for escalation to the formal complaints process.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>E-Learning for all Staff on ‘Complaints Procedure’ Complaints Guidance and Best Practice provided to all staff</p>	We aim to resolve all customer concerns at the first point of contact without need for unnecessary escalation.

	of the complaints process without 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	<p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>https://sandwell.moderngov.co.uk/ecSDDisplay.aspx?NAME=SD532&ID=532&RPID=572039</p>	Any restrictions put on complainants due to unreasonable behaviour are kept under regular review.

5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	Yes	<p>“Any restrictions placed on an individual’s contact due to unacceptable behaviour are proportionate and have regard to the provisions of the Equality Act 2010”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>All restrictions are proportionate and demonstrate regard to the Equality Act 2010</p>
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	<p>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.</p>	Yes	<p>“We will look to resolve the matter for you quickly and without the need for escalation to the formal complaints process.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>E-Learning for all Staff on ‘Complaints Procedure’ Complaints Guidance and Best Practice provided to all staff</p>	<p>We endeavour to resolve all expressions of dissatisfaction from residents at the first point of contact.</p> <p>All complaints are triaged to assess the most appropriate response and find a resolution for the customer as quickly as possible.</p>
6.2	<p>Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the</u></p>	Yes	<p>“The Council will acknowledge receipt of a complaint within 5 working days”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	

	<u>complaint being received.</u>			
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>“We will respond to a Stage One complaint within 10 working days. We aim to resolve most complaints during this stage. We will agree an extension to this timescale with the complainant if required</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	
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	<p>“We will respond to a Stage One complaint within 10 working days. We aim to resolve most complaints during this stage. We will agree an extension to this timescale with the complainant if required</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	Any delay in getting a response to the resident will be fully communicated and agreed, and the reasons for the delay fully explained,
6.5	When an organisation informs a resident about an extension to these timescales, they must	Yes		The contact details of the Ombudsman are included in any communication

	be provided with the contact details of the Ombudsman.			about an agreed extension.
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		Complaint responses are sent out when the answer to a complaint is known, not just when the outstanding actions required to address the issue are completed.
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	<p>“Complaints about Council services will be processed in accordance with the requirements of the General Data Protection Regulations, the Data Protection Act and associated Council policies. We do not exclude complaints about safeguarding, or health and safety issues.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>Complaints address all points raised in the definition of a complaint, and all decisions are made in line with relevant policies and procedures.</p> <p>Decisions are fully explained with reference to relevant laws and policies.</p>

6.8	<p>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.</p>	Yes	<p>“If additional complaints are raised during a Stage 1 investigation and they are related to the initial complaint, then they will be incorporated into the response. However, if they come to light after the Stage 1, and are unrelated or would unreasonably delay the initial complaint response, then they would be logged as a new complaint”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>Any new issues which are unrelated to the complaint being investigated, or are submitted either after the stage 1 response has been issued, or would delay a response unreasonably, these would be logged and investigated as a new complaint.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; 	Yes	<p>E-Learning for all Staff on ‘Complaints Procedure’ Complaints Guidance and Best Practice provided to all staff</p>	<p>Templates used for Stage 1 and 2 responses prompt the inclusion of all of the information requested.</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 stage 2 if the individual is not satisfied with the response.</p>			
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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	<p>"If the complainant is dissatisfied with the outcome of the Stage One response, they can request to escalate their complaint to Stage Two which is the final stage of the complaints process."</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	Templates used for Stage 1 and 2 responses prompt the inclusion of all of the information requested.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days	Yes	<p>"The decision to accept a complaint as qualifying as a Stage Two complaint will be made promptly and should take no more than 5 working days. If we cannot accept your complaint, we will inform you and tell you why"</p>	

	of the escalation request being received.		<u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u>	
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	<u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u>	<p>A Stage 2 consideration is carried out by assessing the initial Stage 1 Complaint and seeing what had or hadn't been done within that. Any new information that may have arisen as a result of the Stage 1 or in the process of the Stage 1 is also considered. We do not do a Stage 2 just to try and look at a Stage 1 in more detail, as the Stage 1 should be there to adequately assess and investigate issues, not leaving them to be checked in a more thorough stage 2 investigation.</p>

				When a complaint has been received, the Customer Feedback Team contact the complainant to set out their understanding of any outstanding issues and the outcomes the individuals are seeking.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>“Following the acceptance of a Stage Two complaint, an investigating officer will be appointed. The investigating officer will not have had any previous involvement with the case”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	“The timeframe to respond to a Stage Two complaint is 20 working days from the date of receipt, except for Children Trust & Adult Services. We will agree an extension to this timescale with the complainant if required”	

			<u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u>	
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	<p>“We will agree an extension to this timescale with the complainant if required”</p> <p><u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u></p>	<p>All extensions to timescales are communicated and agreed with the resident.</p> <p>Reasons for the extension are fully explained.</p>
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		The contact details of the Ombudsman are included in any communication about an agreed extension.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions	Yes		Complaint responses are sent out when the answer to a complaint is known,

	required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			not just when the outstanding actions required to address the issue are completed.
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	<p>“Complaints about Council services will be processed in accordance with the requirements of the General Data Protection Regulations, the Data Protection Act and associated Council policies. We do not exclude complaints about safeguarding, or health and safety issues.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes	<p>E-Learning for all Staff on ‘Complaints Procedure’ Complaints Guidance and Best Practice provided to all staff</p>	Templates used for Stage 1 and 2 responses prompt the inclusion of all of the information requested.

	<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>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>“Stage Two … is the final stage of the complaints process.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	All relevant officers are involved in the investigation and response to the Stage 2 complaint

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	<p>“Putting things right - remedies and redress”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>Best Practice Guidance</p>	We will acknowledge and apologise for failings and offer resolutions and redress as necessary.

	<ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<p><u>www.sandwell.gov.uk/downloads/download/1120/complaints-compensation-policy</u></p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>“If any remedy is offered by the Council, this will reflect the impact on the individual as result of any fault identified”</p> <p><u>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</u></p> <p><u>www.sandwell.gov.uk/downloads/download/1120/complaints-compensation-policy</u></p>	Redress will take into consideration the impact on the individual.

7.3	<p>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.</p>		<p>“The remedy offered will set out what will happen and by when, in agreement with the individual where appropriate. Any remedy proposed is followed through to completion.”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p>	<p>The Customer Feedback Guide sets out this expectation.</p>
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	Yes	<p>“In some cases, it may be appropriate to offer financial recompense to recognise time and trouble taken to resolve an issue, or for any distress that may have been caused due to incorrect action or failure to take action. In such cases the Council will seek guidance from the Ombudsman service”</p> <p>www.sandwell.gov.uk/downloads/download/345/customer-feedback-guide</p> <p>www.sandwell.gov.uk/downloads/download/1120/complaints-compensation-policy</p>	<p>Where guidance is issued by the Ombudsman, this will be taken into account when deciding what remedy to issue.</p>

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 Complaints Performance Sandwell Council</p>	<p>An annual complaints performance and service improvement report is produced, covering all aspects requested.</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 relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes	<p>Housing Complaints Performance Sandwell Council</p>	
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes		<p>Where there are significant changes self-assessments will be completed.</p>
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes		<p>Where an Ombudsman order has requested review of the self-assessment, this has taken place within agreed timescales.</p>
8.5	<p>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.</p>	Yes		<p>In the event of non-compliance due to exceptional circumstances this would be communicated to all relevant parties.</p>

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	Creation of the Housing Resolutions team in February '24 as the result of lessons learned from previous complaints around lack of accountability and communication.	Lessons learnt are recorded and scrutinised to form the basis of service improvements
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	Our quarterly complaint reports include examples of service delivery changes as a result of complaints	Complaints data is used to improve services and complaints are welcomed to uncover any issues with the service, and highlight changes that need to be made.
9.3	Accountability and transparency are also integral to a positive	Yes	Quarterly and annual reports are published online, and shared with officers and tenant groups	Wider stakeholders are

	complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			consulted to promote transparency and accountability
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.		Head of Customer Experience performs this role	
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		We have two MRC's – Cllr V Smith and Cllr P Moore	

	handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.		Quarterly reports are shared with MRCs	Housing Complaints Performance Sandwell Council
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of		The quarterly and annual reports we publish include this	Housing Complaints Performance Sandwell Council

	<p>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-</p>	Yes	<p>https://www.sandwell.gov.uk/downloads/download/1191/housing-complaints-best-practice-guide</p>

<p>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>		
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