

BURY COUNCIL HOUSING SERVICES COMPLAINTS CODE SELF-ASSESSMENT

Welcome to our Annual Self-Assessment of complaints in line with [The Housing Ombudsman Complaint Handling Code](#), which we are obliged by law to follow its requirements. The code aims to achieve best practices in complaint handling and ultimately to provide a better service to tenants.

As well as completing an annual self-assessment, we have a **Council Complaint's Champion** who signs off the code and vets what we do, Cllr Clare Cummins. **Cllr Clare Cummins Cabinet Member for Housing and Complaint Champion, has oversight of complaints, ensuring tenants remain at the heart of our learning and that we have a positive complaint culture, and has stated:**

"I am satisfied with the complaints self-assessment. I understand the complaints process and I am happy that we apply a fair and process. I can see we communicate our performance monthly and via our newsletters and I am meeting regularly with the complaints manager to test our handling of complaints against the process, reviewing case studies for robustness and our ability to deal with our most vulnerable customers. I have reviewed the complaints code and the evidence submitted. I will be involved in the scrutiny of complaints over the course of the year and will meet with service leads about our complaints learning, achievements, and changes made as a result. I am aware of our complaints learning and priorities.

These are; Complaint definitions:

- *Complaint timescales*
- *Implementing learning*
- *Reasonable Adjustment for tenants and applying tailored services where needed*
- *Communicating our actions."*

| | |
|---|--|
| <p>Director of Housing</p> <p>Signed Sian Grant Date: 28th August 2025</p> | <p>Cabinet member for Housing Services and Complaint Champion</p> <p>Signed Cllr Clare Cummins, Date:29th August 2025</p> |
|---|--|

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 Services Complaints Handling Policy | The definition is outlined on page 4 of the policy at 5.3. |
| 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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. | Yes | Housing Services Complaints Handling Policy | Page 4/5 section 5.10 Tenants can ask for other representatives to act on their behalf by completing a 'permission to discuss' form. Section 8 of the policy covers this We have identified from our learning from complaints during 24/25 and from our Tenants Voice Forum reviewing our complaints process areas where we can improve. These are <ul style="list-style-type: none"> Need to ensure there is a clear process in place with the contact centre and all staff to understand how to deal with an expression of dissatisfaction. |
| 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 Services Complaints Handling Policy Making a complaint - Bury Council | Detailed in our Complaints Policy. |
| 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 | Yes | Housing Services Complaints Handling Policy | Detailed in our Complaints Policy page 3, Section 4.4. We have identified from our learning from complaints during 24/25 and from our Tenants Voice Forum reviewing our complaints process areas where we can improve. These are |

| | | | | |
|-----|--|-----|--|--|
| | must not stop their efforts to address the service request if the resident complains. | | | <ul style="list-style-type: none"> • Review our process of using management tasks and how they relate to complaints and service requests as this is unclear. • Add in clear process for the contact centre to triage between service requests and complaints • Remove triage by Complaints Manager as this is an unnecessary step and is causing confusion and delays in complaint handling. • Provide clear instruction to Heads of Service and service managers around responsibility for resolving service delivery issues regardless of whether a complaint has been made to ensure clear separation between complaint management and the delivery of the service. |
| 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>Tenant Satisfaction Measures Process</p> <p>Transactional Survey Process</p> <p>Management Task Process</p> | TSM survey responses are tracked, those tenants who are dissatisfied and are contacted by a manager and escalated if needed. TSM dissatisfaction comments are Management Task service requests requiring action through various tenant first call and feedback channels. The survey includes a link to the complaint's fact sheet or, if via phone or face to face, the tenant will be sign posted. |

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 Services Complaints Handling Policy Complaint Refusal Letter | Outlined on page 5 of our Complaints Policy, section 6 – What is not a complaint and page 6 section 9 When we cannot accept a complaint (exclusions) |
| 2.2 | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed in court. • Matters that have previously been considered under the complaints policy. | Yes | Housing Services Complaints Handling Policy Making a complaint - Bury Council | Outlined on page 6 section 9 - When we cannot accept a complaint (exclusions) Evidence provided on our factsheet title – What is not a complaint. |

| | | | | |
|-----|--|-----|--|--|
| 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 | Housing Services Complaints Handling Policy Making a complaint - Bury Council | Detail outlined in our Complaint Policy page 7 – time limit for making complaints. |
| 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 | Housing Services Complaints Handling Policy | See page 7, 9.3 of the Complaints Policy |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Housing Services Complaints Handling Policy | See section 9 of the complaints policy |

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 Services Complaints Handling Policy Making a complaint - Bury Council Reasonable Adjustment Policy | See page 4, section 5.4 and 5.5 |
| 3.2 | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord. | Yes | Housing Services Complaints Handling Policy | See page 4, section 5.4 and 5.5 |
| 3.3 | High volumes of complaints must not be seen as 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. | Partially | TSM results | <p>Our TSM results for complaints per 1000 properties show that we have very low volumes of complaints and have identified that this is an issue and that we have not been escalating complaints appropriately when tenants complain. We asked our Tenants Voice Forum to carry out a review of our complaint handling process and the areas for improvement are informed by this review as well as our own review of our complaint handling policy and process.</p> <p>Action for improvement:</p> <ul style="list-style-type: none"> • Review our process of using management tasks and how they relate to complaints and service requests as this is unclear. |

| | | | | |
|-----|--|-----|--|---|
| | | | | <ul style="list-style-type: none"> • Add in clear process for the contact centre to triage between service requests and complaints • Remove triage by Complaints Manager as this is an unnecessary step and is causing confusion and delays in complaint handling. • Recruit 2 complaint investigators to ensure we are able to manage the increase in complaints as a result of the above changes. |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website. | Yes | Housing Services Complaints Handling Policy Making a complaint - Bury Council | <p>Our Complaints Factsheet is available in paper or online and made available on tenancy sign-up packs, online, and through ongoing publicity.</p> <p>Advertised at our reception at the Town Hall and copies of policy available for tenants.</p> |
| 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 Services Complaints Handling Policy | See page 4, section 5.8 |
| 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 | Housing Services Complaints Handling Policy | See page 6 section 8 – making complaints on behalf of others. |
| 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 Services Complaints Handling Policy Making a complaint - Bury Council | See page 11 section 16 – escalation to the Housing Ombudsman Service |

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 | Complaints Team | <p>This is a dedicated post. Complaints Manager investigates and responds to Stage 1, liaises with Heads of Service at Stage 2 to support their review of the complaint. The post holder is the Ombudsman Service named contact. The post holder produces quarterly and annual performance and learning reports. The role also includes providing training to the organisation and reports to the Head of Performance, Improvement and Assurance.</p> <p>Action for improvement:</p> <ul style="list-style-type: none"> Recruit 2 complaint investigators to ensure we are able to manage the increase in complaints as a result of the above changes. |
| 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 | Permission is granted at all levels to access IT systems, file paths, call listening etc. | <p>The Complaints Manager works at management level across the business. Full access to all information systems to interrogate evidence collection. Report to member of the Senior Leadership team who assist with blockages within the business.</p> <p>The team is also support by the MRC who is the Portfolio Holder for Housing.</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 | Annual complaint performance and learning report 24/25 | <p>All formal complaints are risk assessed which means that some complaints, if required, are prioritised and investigated within 24 hours if health and safety or safeguarding related.</p> <p>Training provided to front-line staff on the complaints process is mandatory, last delivered May 25 and ongoing.</p> <p>Complaint performance and learning is reported to Senior Leadership team on a quarterly basis and Housing Advisory Board twice a year.</p> <p>We record and track all complaints learning.</p> <p>Action for improvement</p> <ul style="list-style-type: none"> Report complaint learning and tracking to Operational managers meeting |

Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary/explanation |
|----------------|---|------------------|---|---|
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | Housing Services Complaints Handling Policy | Complaints Policy revised August 2025 (<i>12-month rule and greater clarification of process</i>) |
| 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 Services Complaints Handling Policy | |
| 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 Services Complaints Handling Policy | We operate a 2-stage 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 Services Complaints Handling Policy | All complaints are handled by Housing Services following our policy |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Housing Services Complaints Handling Policy | All complaints are handled by Housing Services following our policy |

| | | | | |
|-----|---|-----|--|---|
| 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 Services Complaints Handling Policy Complaint template letters | See section 12 of the Complaints Policy – stage one investigating complaints |
| 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 Services Complaints Handling Policy Stage 1 and Stage 2 acknowledgement letter template | See section 12 of the Complaints Policy – stage one investigating complaints |
| 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; give the resident a fair chance to set out their position; b) take measures to address any actual or perceived conflict of interest; and c) consider all relevant information and evidence carefully. | Yes | Housing Services Complaints Handling Policy Stage 1 investigation checklist Stage 2 complaint toolkit for managers | See section 12 of the Complaints Policy – stage one investigating complaints Stage 1 and Stage 2 follow an investigation checklist and toolkit has been devised to ensure we are adhering to policy and service standards including timescales as a main reference to resolve issues and treat tenants fairly based on evidence. |
| 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 | Complaint extension letter template | See section 18 of the Complaints Policy – delayed responses |

| | | | | |
|------|--|-----|--|---|
| 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 | Housing Services Complaints Handling Policy Reasonable Adjustment Policy | See section 5.4 of the complaints 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 Services Complaints Handling Policy Making a complaint - Bury Council | See section 13 – stage 2 – reviewing investigations. Specifically 13.2. |
| 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 | IT Case Management Folder | All complaints have case management folders created and filed by stage and year accessible to the Complaints Team, Contact Centre, Business Managers, and Head of Service. All complaints, outcomes, and learning are recorded on QL case management system. |
| 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 | Housing Services Complaints Handling Policy | The Complaints Manager is tasked to provide a quick resolution where possible. The role is to risk assess complaints, taking into account tenant vulnerability, health, and safety concerns to determine the urgency of the issues raised. This can be evidenced in several complaint decisions where remedies have been actioned before the compliant response has been sent and as part of a follow- up conversation. |

| | | | | |
|------|---|-----|---|---|
| 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 | Housing Services Complaints Handling Policy Unacceptable behaviour process | See section 21 – Misuse of the complaints process |
| 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 | Housing Services Complaints Handling Policy Unacceptable behaviour process | See section 21 – Misuse of the complaints process |

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 | Housing Services Complaints Handling Policy | See section 12 – Stage one -investigating complaints. |
| 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 Services Complaints Handling Policy Making a complaint - Bury Council | See section 12 – 12.1 complaint acknowledgement |
| 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 Services Complaints Handling Policy | See section 12 – 12.4 complaint response letter |
| 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 Services Complaints Handling Policy | See section 12 – 12.3 |

| | | | | |
|-----|--|-----|---|-----------------------|
| 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 Services Complaints Handling Policy | See section 12 – 12.3 |
| 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 Services Complaints Handling Policy | See section 4.4 |
| 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 | Housing Services Complaints Handling Policy Stage 1 and Stage 2 response letter template | See section 12.4 |
| 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 Services Complaints Handling Policy | See section 12.4 |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; | Yes | Housing Services Complaints Handling Policy Stage 1 and Stage 2 response letter template | See section 12.4 |

| | | | | |
|--|--|--|--|--|
| | 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. | | | |
|--|--|--|--|--|

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 Services Complaints Handling Policy Making a complaint - Bury Council | See section 13 of the complaint policy |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received. | Yes | Housing Services Complaints Handling Policy | See section 13 of the complaint policy |
| 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 Services Complaints Handling Policy | See section 13.2 of the complaints policy |
| 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 Services Complaints Handling Policy | See section 13.4 of the complaints policy |

| | | | | |
|------|---|-----|--|---|
| 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 Services Complaints Handling Policy | See section 13.6 of the complaints policy |
| 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 Services Complaints Handling Policy Making a complaint - Bury Council | Section 13.5 of the complaints policy |
| 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 Services Complaints Handling Policy Making a complaint - Bury Council | Section 13.5 of the complaints policy |
| 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 Services Complaints Handling Policy Stage 1 and Stage 2 response letter template | See section 13.6 of the complaints policy |
| 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 Services Complaints Handling Policy | See section 13.6 of the complaints policy |

| | | | | |
|------|--|-----|---|---|
| | | | | |
| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition. c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Housing Services Complaints Handling Policy Stage 1 and Stage 2 response letter template | See section 13.6 of the complaints policy |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Housing Services Complaints Handling Policy | See section 13 of the complaint policy |

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: <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. | Yes | Housing Services Complaints Handling Policy | Section 15 – remedies and compensation |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Housing Services Complaints Handling Policy Compensation policy | Section 15 – remedies and compensation |
| 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 Services Complaints Handling Policy Compensation policy | Section 15 – remedies and compensation |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Housing Services Complaints Handling Policy Compensation policy | Section 15 – remedies and compensation |

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. | <p>Yes</p> <p>Yes</p> <p>Yes</p> | <p>Annual complaint performance and learning report 24/25</p> | |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published | Yes | Cabinet report | |

| | | | | |
|-----|--|-----|----------------------|--|
| | alongside this. | | | |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Self-assessment 2025 | <p>Bury Council housing stock transferred the management of the stock back into the Council from ALMO (Six Town Housing) in February 2024.</p> <p>We have also restructured the service in 2025 and moved the reporting and the complaints team and are in the process of adding additional resources to the complaints team to address some of the issues identified around having an open and transparent complaints service and addressing the underreporting / de-escalation of complaints.</p> <p>As a result of these changes a number of actions are identified to improve our approach complaint handling and our overall compliance with the complaint handling code.</p> |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | | We will action and comply with any such request from the Ombudsman. |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code | Yes | | In the event of exceptional circumstances such a cyber incident, we will inform the Ombudsman and take all necessary action as required. |

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 | Annual complaint performance and learning report 24/25 Quarterly reports to leadership | Learning is considered and evidence individually for each complaint regardless of whether it is upheld or not (e.g. better ways to apply reasonable adjustments) . Complaints are reviewed quarterly and annually to understand all learning and identify emerging trends/themes to inform the service improvement plan. |
| 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 | Staff meeting PowerPoint Presentations from various meetings | In addition to the Leadership Complaints Monitoring Group who own complaints Managers take all tenant feedback to their team quarterly. In addition, the Complaints Manager holds a Thursday roadshow of informal 1-2-1 and meet and greets across the business Tea 3, Coffee cake, and chat to be more inclusive with front-line service to look at different ways of working with support. This has worked really well in changing the way we work e.g. reasonable adjustments. |
| 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 | Reports to Housing Advisory board and minutes Cabinet minutes TVF minutes Our Performance - Bury Council | We report performance on complaints twice a year to our Housing Advisory Board We report complaints performance to Cabinet on an annual basis. The Tenants Voice Forum has been reviewing our approach to complaint handling including learning and performance |

| | | | | |
|-----|--|-----|--|---|
| 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 | Director of Housing & the Head of Performance, Assurance and Improvement are accountable for complaint handling. | |
| 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 | The portfolio holder for Bury Housing Services Cllr Clare Cummins is the member responsible for Complaints. | |
| 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 | HAB minutes Cabinet minutes | The MRC has direct access to the complaints support team should additional information be required. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. | Yes | HAB minutes on complaint reporting and complaint handling report Cabinet minutes on complaints | Six monthly reports to HAB on complaints Annual report to Cabinet on complaints |

| | | | | |
|-----|--|-----|--|---|
| 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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | <p>Let's Values</p> <p>Leadership standard agenda item</p> | <p>The Complaints Manager meets with Leadership quarterly to ensure that complaint priorities and themes are understood and supports change and culture across the business and to third parties.</p> <p>Standard agenda item on leadership meetings to discuss any issues with complaint handling</p> <p>Action for improvement – add as a standard agenda item to monthly operational managers meetings to discuss collective responsibility and ownership</p> |
|-----|--|-----|--|---|