

## 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><b>Director of Housing</b></p>          <p><b>Signed John Holman    Date: 27.06.24</b></p>	<p><b>Cabinet member for Housing Services and Complaint Champion</b></p>          <p><b>Signed Cllr Clare Cummins,    Date:27.06.24</b></p>
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## 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	<a href="#">Complaint Policy</a>	The definition is outlined on page 2 4.1 of the Complaints Policy. Policies are created, revised, and signed off by tenants and the Housing Advisory Board. Added definition of a Service Request - A service request is a request from a tenant or leaseholder requiring action to be taken to put something right such as a late appointment. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly. A service request will be sent to a manager to contact the tenant or leaseholder quickly to put it right. If having reviewed this request to put it right you are still not satisfied, then the request could escalate to become 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 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	<a href="#">Complaint Policy</a>  Councillor Casework Process Flow (provided to HOS)  MP Complaints Process (provided to HOS)  <a href="#">Permission to discuss form</a>	Refer to Page 3 Section 4, Definition  Tenants can ask for other representatives to act on their behalf by completing a 'permission to discuss' form.
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	<a href="#">Complaint Policy</a>  <a href="#">Complaints Fact sheet</a>  <a href="#">Complaints Performance 23-24</a>	Detailed in our Complaints Policy. Page 3, Section 4 – Definition of a complaint.  Refer to What is a service request, what is a complaint.  Refer to page 17, Management Tasks. These are service requests, captured and reported regularly as part of the "Tenant Voice".

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	<a href="#">Complaint Policy</a> <a href="#">Complaints Performance 23-24</a>	<p>Detailed in our Complaints Policy page 3, Section 4.1 – Definition.</p> <p>See Complaints Performance 2023-24 Management tasks are captured and monitored to completion stage which includes “escalation” which means formal complaint.</p> <p>See the number of Service requests escalated to formal complaints.</p>
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>Tenant Satisfaction Measures Process (provided to HOS)</p> <p>Transactional Survey Process (provided to HOS)</p> <p>Management Task Process (provided to HOS)</p>	<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.</p>

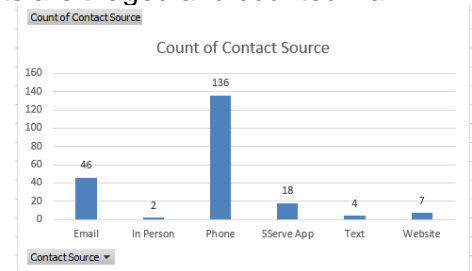
## Section 2: Exclusions

Code provision	Code requirement	Compl y: 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	<a href="#">Complaint Policy</a>  Complaint Refusal Letter (provided to HOS)	Outlined on page 3 of our Complaints Policy, section 5 - Exclusions.  Any refusal is replied to in writing.
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: <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed in court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<a href="#">Complaint Policy</a>  <a href="#">Complaints Fact sheet</a>  Complaint Refusal Example (provided to HOS)	Outlined on page 3 Section 5 Exclusions of our Complaints Policy.  Evidence provided on our factsheet title – What is not a complaint.  Example response refusing to investigate.
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	<a href="#">Complaint Policy</a>  <a href="#">Complaints Fact sheet</a>  Stage 1 Complaint Response	Detail outlined in our Complaint Policy page 3, section 4 – Definition.  Refer to the heading 'What is a complaint?'  See anonymised responses considering issues longer than 12 months.

			Example (provided to HOS)	
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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	Complaint Refusal Example (provided to HOS)	A refusal template is in place which includes the option to contact HOS. See anonymised responses.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Triage Process (provided to HOS)  Complaint Refusal Example (provided to HOS)	All complaint exclusion requests are referred to the Complaints Manager for approval or refusal. The Complaints Manager will either log as a complaint or refuse and will update the tenant in writing.

### 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	<p><a href="#">Complaint Policy</a></p> <p><a href="#">Complaints Fact sheet</a></p> <p>Staff Complaint Referral Form (provided to HOS)</p> <p><a href="mailto:Housing.enquiries@bury.co.uk">Housing.enquiries@bury.co.uk</a> automated Email response (provided to HOS)</p>	<p>Refer to Page 2, 2.1 Legal Requirements</p> <p>This is available online/paper and to staff and included in Tenancy Sign up packs.</p> <p>Multiple channels are available to make a complaint as follows:</p> <ol style="list-style-type: none"> <li>1. Added to tenancy start up pack.</li> <li>2. Completing our online form via our website</li> <li>3. Email us via Housing Enquiries <a href="mailto:HousingEnquiries@bury.gov.uk">HousingEnquiries@bury.gov.uk</a></li> <li>4. Call us on 0161 686 8000</li> <li>5. Send a private message via Facebook Messenger at <a href="https://www.facebook.com/sixtownhousing">www.facebook.com/sixtownhousing</a></li> <li>6. Write to us at; 6 Knowsley Place, Angouleme Way, Bury</li> <li>7. <i>Download our self-serve app at your Apple or Google Play Store and select "Make a Complaint."</i></li> <li>8. Home visit or during a sign-up by an Operative or Officer such as a Housing Officer or Rents Advisor.</li> <li>9. Linked to our TSM survey – complaints question.</li> <li>10. Face-to-face during events such as coffee mornings in the community and at our Sheltered and Supported schemes.</li> </ol> <p>Complaints are triaged and counted via “contact source”.</p>  <p>This is the automated Contact Centre acknowledgment to all emails and online forms sent to <a href="mailto:Housingenquiries@bury.gov.uk">Housingenquiries@bury.gov.uk</a></p> <p>Over 50,000 contacts are received per year. - Our automated email response includes - <i>We want to provide you with a great service.? If you are not satisfied with the quality of the service provided visit our</i></p>

[Reasonable Adjustment Policy](#)

*Customer Care and Complaints page on our website where you can escalate an issue and read more about our complaints process. Alternatively, please respond to this email clearly stating that you wish to make a complaint.?*

Sets out our commitment to comply with duties under the Equality Act 2010. All complainants are screened for up-to-date needs and tailored where needed.

All complainants are offered a courtesy call and reasonable adjustments are put in place where needed. In 2023-24 1 tenant communicated via sign video using messenger, 2 tenants unable to read/write had adjustments recognised and a verbal response followed up by a visit. We raise awareness of the Equality Act and tailoring services to meet our tenant needs and Reasonable Adjustments. This is one of our most popular workshops.

See below for examples of tailored services which, when recorded, create automated system pops ups before any service request/transaction can be logged through to delivery e.g. A repairs operative will see that a tenant is Hard of hearing, disabled etc.

To tailored svcs call contact b4 visit - Dementia	TAILORED	26/02/2024	Tailored Service Required	please ask operatives to call when they are on the way - tenant has dementia and her Daughter needs to be there, she will attend when they call
th See tailored service, health conditions ahead of repairs	TAILORED	02/05/2024	Tailored Service Required	Following complaint updated vuls - COPD, emphysema and heart problems, severe chronic rhinitis - consider repair priorities related to health

3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p><b>Staff Communications and training, including workshops on complaints and staff newsletter articles outline the process (provided to HOS)</b></p>	<p>Annual complaints awareness and training provided to leadership and staff teams.</p> <p>This is ongoing to raise staff awareness to raise complaints through our newsletter and training in referral form.</p> <p>Articles snippets from newsletters:</p> <p><b>Complaint's Handling</b> – A new approach has recently been implemented which includes the removal of the 'informal process'. Incorporated into the new approach are the Ombudsman recommendations on complaints handling to help us improve the services we deliver.</p> <p><u><b>Learning from Complaints</b></u></p> <p>Since April 2023, we have received 58 Stage 1 complaints. Of these;</p> <ul style="list-style-type: none"> <li>• 67% were fully justified.</li> <li>• 12 were escalated to Stage 2 of our process.</li> <li>• Only 1 has been escalated to the Housing Ombudsman.</li> </ul> <p>Since this, we have made a number of adjustments to our service and provided training to</p> <p>A reminder was sent to all staff via our internal newsletter.</p>
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.	Yes	<p>Report outlining trends and actions. (provided to HOS)</p> <p><u><a href="#">Complaints Performance 23-24</a></u></p> <p><u><a href="#">Learning from complaints</a></u></p>	<p>Our Tenant Voice brings together feedback from service requests, complaints, and surveys to identify themes.</p> <p>We monitor complaints including service trends to identify service spikes and, if necessary, spotlight and review with involved tenants. This has included a damp and mould review carried out by our Customer Review Group following tenant dissatisfaction with our process.</p> <ul style="list-style-type: none"> <li>• A revision of <u><a href="#">ASB policies and procedures</a></u> due to repeat complaints.</li> <li>• A revision and publication of <u><a href="#">repair timescales</a></u> to improve day-to-day repairs.</li> <li>• A review of <u><a href="#">Damp and Mould</a></u>, introducing a risk-based triage</li> </ul>
ba3.4	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	Yes	<p><u><a href="#">Complaint Policy</a></u></p> <p><u><a href="#">Complaints Fact sheet</a></u></p>	



	timeframes for responding. The policy must also be published on the landlord's website.			<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	<a href="#">Complaint Policy</a>	Details on how we publicise is located on page 4, Section 7, Our Approach.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf and to be represented or accompanied at any meeting with the landlord.	Yes	<p><a href="#">Permission to Discuss Form</a></p> <p>MP Complaints process (provided to HOS)</p> <p>Councillor Casework Process Flow (provided to HOS)</p>	<p>Refer to the heading 'Who can complain' which refers to 3<sup>rd</sup> party using 'permission to discuss' form.</p> <p>Tenants can ask their Councillors and elected representatives to act on their behalf. These are logged accordingly.</p> <p>Tenants can ask for other representatives to act on their behalf by completing a 'permission to discuss' form or giving us authorisation verbally. Our Housing Management system is then updated to reflect this. For some of our most vulnerable tenants, we have internal "single point of contact" Permission to discuss with other representatives</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<a href="#">Complaints Fact sheet</a>	Refer to what happens next For stages 1 and 2 and how to escalate to the Ombudsman Service.

## Section 4: Complaint Handling Staff

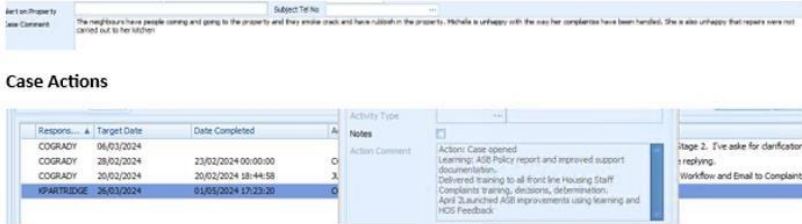
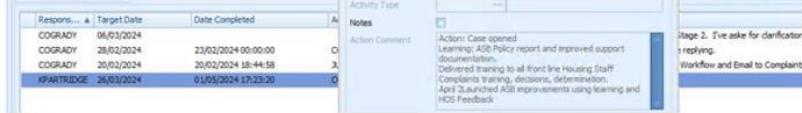

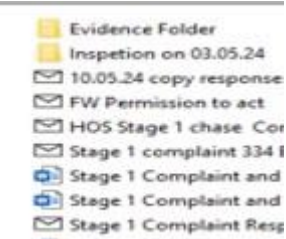
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaint Manager Job Description (provided to HOS)	This is a dedicated post. Complaints Manager investigates and responds to Stage 1, liaises with Heads of Service at Stage 2, and provides evidence to date folder. 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 Housing and Neighbourhood Services.
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. (provided to HOS)	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.
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	Training provided to all staff below - Annually / quarterly (provided to HOS)  <a href="#">Complaints Performance 23-24</a>	Training provided to front-line staff on the complaints process is mandatory.  Following determinations by the Ombudsman training was provided on the learning. Subsequent training was provided to assist those who struggled to implement the learning for example those who needed training on our housing management system.  Briefing sent to all staff on culture shift and importance on action on complaints.  Culture nudging is a key priority for the Complaints Managers who delivers training every Thursday tailored to the audience for management, new starters, and different business teams.

## 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	<a href="#">Complaint Policy</a>	Complaints Policy revised April 2024 ( <i>12-month rule and including Service request clarification</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	<a href="#">Complaint Policy</a>	Refer to page 2, Section 4 heading Definition - Service Requests are dealt with by Managers for a quick resolution. All complaints are logged and progress in line with the Complaints 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	<a href="#">Complaint Policy</a>	We operate a 2-stage process. Stages are detailed on pages 5 – 7.6 of our policy.
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	<a href="#">Complaint Policy</a>	All complaints are handled by Housing Services 2 stage process page 5 section 7.6 - Page 3 4.1 - A complaint is a response to a service requested and provided by Housing Services or its contractors that a tenant or group of tenants or leaseholder are dissatisfied with the service
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="#">Complaint Policy</a>	All complaints made about a contractor or a service that we may have outsourced come directly to us to progress. Tenants are contacted to discuss the complaint at stage 1 and stage 2. This is always the tenant's choice what communication channel they would like to discuss their complaint, face to face, telephone or email. This is then detailed in the complaint response



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	<a href="#">Reasonable Adjustment Policy</a>  Reasonable Adjustment Procedure for staff (provided to HOS)  Getting to know you survey for tenants (provided to HOS)	<p>Reasonable adjustment policy outlines our approach on recording and amending our services to those with a vulnerability or disability. As part of Stage 1 all complainants are asked to disclose any disability/ vulnerabilities. This will allow us to update systems to amend our services going forward to meet the need and to consider during the complaint process.</p> <p>In addition, Reasonable Adjustment guidance supports Complaints and all day-to-day touchpoints throughout the business and supports team training. All alerts are recorded on QL and reports are provided to staff and contractors when needed.</p> <p>Example of reasonable adjustments in practice.</p> <table><tr><td>Tailored Service Required</td><td>Shielding so only 1 appt per day. Appointments need to be PM due to health/medication needs. Appointments must be made with the customer due to regular medical appts. Text reminder/arrival essential.</td></tr><tr><td>Tailored</td><td>Tenant has MCI. Prefer communication</td></tr></table>	Tailored Service Required	Shielding so only 1 appt per day. Appointments need to be PM due to health/medication needs. Appointments must be made with the customer due to regular medical appts. Text reminder/arrival essential.	Tailored	Tenant has MCI. Prefer communication
Tailored Service Required	Shielding so only 1 appt per day. Appointments need to be PM due to health/medication needs. Appointments must be made with the customer due to regular medical appts. Text reminder/arrival essential.							
Tailored	Tenant has MCI. Prefer communication							
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	<a href="#">Complaint Policy</a>  <a href="#">Complaints Fact sheet</a>	<p>Refer to Page 5 Section 7.6 of our Complaints policy which clearly sets out the process and advertises to tenants how they can escalate.</p> <p>Refer to what happens next. Only matters which have no relation to the complaint issues will not be escalated but they will be signposted to a service request.</p>				

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 (provided to HOS)	<p>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.</p> <p>All complaints, outcomes, and learning are recorded on QL case management system.</p> <p><b>IT Interface</b></p> <p><b>Case detail</b></p>  <p><b>Case Actions</b></p>  <p><b>Case Archive</b></p>  <p><b>Case management folder</b></p> 
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.			<p>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.</p>

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>Unacceptable behaviour process (provided to HOS)</p> <p>Zero tolerance procedure (provided to HOS)</p> <p>Lone Working Procedure (provided to HOS)</p> <p>Eyes wide open training (provided to HOS)</p>	<p>Unacceptable behaviour largely relates to high volume and sometimes challenging behaviour and, as a result, having to restrict contact arrangements. We continue to support the substantive issue within referring to policies for the safety of our staff, contractors and other tenants and a duty of care.</p> <p>Zero tolerance and lone work procedure give guidance to staff on what is not acceptable, and the steps needed to take to support, take action and prevent future incidents.</p> <p>Training provided to all managers which has been cascaded through team meetings on the above policies.</p> <p>Training to managers is delivered twice a year.</p>
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	<b>Case Example (provided to HOS)</b>	A recent case of a tenant with Mental Health contacting the business daily with different issues and expectations of timescales.

## 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	<a href="#">Complaint Policy</a>	Refer to section 7.8 – <b>Reasonable Adjustment</b> The policy specifically refers to reasonable adjustments and, as part of the Stage 1 first contact this is always raised, and adjustments are put in place if required and stated in the response. Actions are brought forward whilst an investigation is ongoing if a tenant has a health vulnerability that would require an urgent inspection/visit.  During May 2023, 3 complaints investigation actions were fast-tracked ahead of the final response.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">Complaint Policy</a> <a href="#">Complaints Fact sheet</a>  Stage 1 and Stage 2 acknowledgement letter template (provided to HOS)	Refer to Page 5, 7.6 HOUSING SERVICES complaint process has two stages. Refer to the 'What Happens Next' section. All complaint requests are triaged regardless of stage and acknowledged including ref / in writing.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Stage 2 complaint response template (provided to HOS)	100% on track
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	Yes	Complaint extension request template. (provided to HOS)	This is a rarity and only once due to a technical report being required and the specialised required being on annual leave. This was agreed with the tenant.



	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.			
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	Complaint extension request template (provided to HOS)	Letter sent where extension required. 1 extension was requested during 2023-24
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	Stage 1 and Stage 2 response letter template (provided to HOS)	Complaint Templates already in place with essential info issues, investigation methods, service policy/standard, outcome, timescales, single point of contact, and learning and action plan
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	Stage 1 and Stage 2 response letter template (provided to HOS)	Complaint Templates are already in place with essential prompts for key information definition investigation methods, service policy/standard, outcome, timescales, single point of contact, and learning and action plan
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	Yes	At Stage 1, each complainant is offered a courtesy call to "confirm issues to investigate" (provided to HOS)	Response extract <i>"From reviewing your email and our conversation on (date) I have identified the following issues which you would like investigating: "This covers additional information until the point of response.</i>

	new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Stage 1 and Stage 2 response letter template (provided to HOS)	Stage 1 and Stage 2 templates are in place covering A to G and are reviewed annually.

## **Stage 2**

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary/explanation</b>
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	<a href="#">Complaints Fact sheet</a>	Hopefully, things can be sorted to your satisfaction at Stage 1 of our complaints process but if they can't, or if you are still not happy with our response, you can appeal.
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	Stage 2 acknowledgement letter template (provided to HOS)	Your appeal will be acknowledged within 5 working days and be considered by a Senior Manager within 20 working days.
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	Yes	Stage 2 acknowledgement letter template (provided to HOS)	A review of your complaint will take place which may involve a telephone call to you.

	remains unhappy as part of its stage 2 response.			
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Complaint Policy</a>	Refer to Section 7.6 of our Complaints Policy which outlines our stance.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaint Policy</a>	Refer to Section 7.6 of our Complaints Policy which outlines our stance. As of April 2024, our response time changed from 10 to 20 days to align with changes within the code.
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	<a href="#">Complaint Policy</a>  <a href="#">Complaints Fact sheet</a>	Refer to Section 7.6 - A written response will be provided to the customer within 20 working days. If they are unable to conclude their investigations within this timeframe, they will explain this to the customer and agree on an extension.  Includes “If, for any reason, we are not going to be able to respond within this time frame, we will call you to explain why and agree on a timescale with you, confirming the new timescale in writing.”
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	Complaint extension request template (provided to HOS)	Our template states, “ <i>If you do not agree with this approach, you can contact the Housing Ombudsman Service. You can contact them via In writing to: Housing Ombudsman Service, Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET , By telephone: 0300 111 3000, By fax: 020 7831 1942 By email: <a href="mailto:info@housing-ombudsman.org.uk">info@housing-ombudsman.org.uk</a>, By text: text ‘call back’ to 07624 804323</i> ”.
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	Stage 1 and Stage 2 response letter template (provided to HOS)	Complaint Templates are in place. The letter outlines details of the complaint, investigation methods, service policy/standard, outcome, timescales, single point of contact and learning.

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	See anonymised example of policy for complaint investigation (provided to HOS)	All responses refer to relevant service policy/standard relevant to issues
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; 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	Stage 1 and Stage 2 response letter template (provided to HOS)	Templates are designed to meet the HOS expected standard. Complaint responses are shared and “signed off” to ensure they meet the template standard. Training with managers is ongoing to keep them on track with expected standards.
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="#">Complaint Policy</a>	Page 5 - 7.6 only Senior Management can respond to a Stage 2 complaint. .

## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Complaint Process Working Guidance (provided to HOS)</p> <p>Stage 2 complaints toolkit for managers (provided to HOS)</p> <p>Anonymised example of a response (provided to HOS)</p>	<p>This is all set out in the flowchart, internal tool kit.</p> <p>All new managers receive 1-2-1 induction training and annual refresher training on complaints as well as feedback on HOS determinations.</p> <p>In 2023 all letter standard response templates were introduced to ensure all complaint responses include what is required.</p> <p>All managers take part in annual refresher training to pick up “areas for improvement to address”.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation policy (provided to HOS)	Independent Complaint Investigator has autonomy to agree on remedy and Compensation Guidance for financial 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	Anonymised response Example (provided to HOS)	Will consider sign off letter when all agreed actions are complete
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation policy (provided to HOS)	The attached guidance is a remedy guidance and is used for all complaints.

## Section 8: Self-assessment, reporting, and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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    Yes   Yes	<a href="#">Complaints Performance and Learning 2023-24</a>  <a href="#">Complaints report 23-24</a>  <a href="#">Complaints learning summary 23-24</a>	Annual report in progress Complaints Annual report in progress
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No	<a href="#">Complaints Performance and Learning 2023-24</a>	Annual Report in progress and being designed in partnership with tenants and will be available in July 2024 and reported to the Housing Advisory Group.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Under review. (provided to HOS)	Bury Council housing stock transferred the management of the stock back into the Council from ALMO (Six Town Housing) in February 2024.  We will review it to align Housing Service and Bury Council Complaints Policy this financial year.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Board meeting Minutes, 18 Sept 2023 (provided to HOS)	Following maladministration discussion was held with senior management and the Public Service Reform team.
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	Fully compliant (provided to HOS)	No incidents to report from 2023/24.

## 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	<a href="#">Complaints learning summary 23-24</a>	<p>Learning is considered and evidence individually for each complaint regardless of whether it is justified or not (e.g. better ways to apply reasonable adjustments) or a Service request.</p> <p>Complaints are reviewed quarterly and annually to list all learning and identify emerging trends/themes to formulate at the Service Improvement Plan</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.	Yes	<p>Staff meeting PowerPoint Presentations from various meetings (provided to HOS)</p>	<p>In addition to the Leadership Complaints Monitoring Group who own complaints Managers take all tenant feedback to their team quarterly.</p> <p>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.</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 residents' panels, staff and relevant committees.	Yes	<p><a href="#">Complaints learning summary 23-24</a></p> <p>Monthly meeting agenda (provided to HOS)</p>	<p>Our managers manage contractors and monitor key performance. Complaint performance and learning are part of this.</p> <p>See Priority 6 Review External Contractor Customer Service Arrangements</p>



			<p>Customer Review Group Meeting Minutes, 14 Feb 2023 (provided to HOS)</p> <p>Complaints Update Meeting PowerPoint Jan 2024 (provided to HOS)</p> <p>Regulation and Performance Review Group Meeting Minute (provided to HOS)</p>	<p>Review arrangements with contractors to include regular feedback so that all contractors are working to the same Tenant Offers as expected e.g. timescales. Record keeping, alerting STH to delays, Reasonable adjustments, etc.</p> <p>Customer Review Group minutes which include updates on performance.</p> <p>Performance and Review Group is a scrutiny group of Housing Services performance from wider leaders within the council. See the attached presentation on complaints and minutes that include performance.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<p>Complaints Manager Job Description (provided to HOS)</p> <p><a href="#">Complaints learning summary 23-24</a></p> <p><a href="#">Anti-Social Behaviour Policy</a></p> <p><a href="#">Repair priorities online</a></p> <p><a href="#">Damp &amp; Mould Policy</a></p>	<p>Independent Complaints Manager in post includes that as part of the role. See the attached job description. Refer to Service Improvement – Priority Learning Themes</p> <p>Complaints Learning Summary includes all themes rationale and risk if not adopted. Following this, we have reviewed Anti-Social Behaviour Policy, repairs and damp priorities, and damp and mould policy.</p> <p>We are also due to review the Management Move policy following a number of maladministration's.</p>
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		Complaints Manager leads on 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	Yes	<a href="#">Complaints Performance 23-24</a>	We report performance which includes complaints bimonthly to our Performance and Review Group within the council. This group is senior members of Bury Council who scrutinise our performance.
	handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.		<p>Board Meeting Minutes, 22 June 2023 (provided to HOS)</p> <p>Complaints Update Meeting PowerPoint Jan 2024 (provided to HOS)</p> <p>Ombudsman Case Learning July 2023 (provided to HOS)</p>	<p>We discuss performance with our tenant panel each month at our Customer Review Group. From April this has changed to quarterly at Housing Advisory Board</p> <p>Previously, before transfer in February 2024, performance was discussed at Six Town Housing Board. See attached an example of the minutes.</p>

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	<p><a href="#">Complaints Performance 23-24</a></p> <p><a href="#">Complaints learning summary 23-24</a></p> <p>Board Meeting Minutes, 22 June 2023 (provided to HOS)</p> <p>Complaints Update Meeting PowerPoint Jan 2024 (provided to HOS)</p> <p>Ombudsman Case Learning July 2023 (provided to HOS)</p>	<p>Quarterly/annual reports to Leadership, Housing Advisory Board</p> <p>Report to staff ongoing via tailored presentation to staff teams from management to front line. Saved is the presentation January 2024 and minutes of the meeting.</p> <p>Presentation to Senior Leaders in Bury and NHS through Public Service Reform on failings and support required to ensure we are getting it right as a partnership going forward.</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> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes	<p><a href="#">Complaints Performance 23-24</a></p> <p>Customer Review Group Meeting Minutes 14 November 2023 (provided to HOS)</p> <p>Monthly Meeting Agenda (provided to HOS)</p>	<p>The Complaints Manager meets with Leadership monthly to ensure that complaint priorities and themes are understood and supports change and culture across the business and to third parties.</p> <p>Sub-contractor liaison groups' key performance indicators include complaints and compliments.</p> <p>Training provided to managers and teams on culture and learning from complaints.</p> <p>We cover Lunchtime Learning throughout the year with topical catch-up. Complaints Learning is very popular.</p>
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**Note:** Any records mention within this assessment can be provided upon request.