

Hull City Council Housing Ombudsman Self-Assessment**Date of Assessment; January 2023**

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint**Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Hull City Council's Customer Feedback Scheme uses the Local Government & Social Care Ombudsman's (LGSCO) definition of a complaint. The judgment made in this self-assessment is that the Council is compliant with Housing Ombudsman's Code as explained below. The Housing Ombudsman's (HO) definition only applies to Housing issues. It is different to the Local Government & Social Care Ombudsman's (LGSCO) definition of a complaint; <i>"A complaint is an expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response."</i> HCC are members of both Ombudsman's. For simplicity and consistency across all of HCC's functions only 1 definition of a complaint is used. This is the LGO's definition. It

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			<p>does not restrict access or exclude complaints without good reason and is simpler to understand. It is compatible with the HO's definition. In the case of any doubt reference would be made to both definitions.</p> <p>https://www.hull.gov.uk/council-and-democracy/consultation-and-feedback/what-happens-my-feedback</p>
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	<p>Where the substance of feedback amounts to a complaint it is recorded as a complaint and investigated as such. This is even if the resident has not expressly stated they wish to make a complaint. This is catered for in the LGSCO definition of a complaint "<i>A complaint is an expression of dissatisfaction</i>"</p> <p>3rd party correspondence (including those from MP's and Cllr's) are assessed, and if they amount to a complaint, are recorded as such, and investigated as per the feedback policy.</p>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	As per HCC Feedback Policy, if the substance of an enquiry amounts to a complaint, then it is recorded on Contact360 (C360) as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>All requests to record a complaint are assessed and accepted unless there are valid reasons not to. Exclusions only exist where there are legitimate and justifiable reasons. If an issue is being reported for the 1st time, then it may be considered as a request for service rather than a complaint. This is in keeping with the advice issued by the Housing Ombudsman which is to be read alongside the Complaints Code.</p> <p>http://theintranet.hullcc.gov.uk/big-picture/corporate-support-services/corporate-customer-feedback-team/corporate-feedback-policie-6</p>

<p>1.8</p>	<p>A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.</p>	<p>Yes</p>	<p>HCC Feedback Policy states; “If this is the first time you are reporting an issue to us, we may decide to treat this as a Service Request or as a Suggestion. You should make us aware of your complaint within 12 months of the incident happening or within 12 months from when you first became aware that you had reason for complaint. If your complaint is received later than this, we may not be able to be fully investigate it. The time limit may be extended at the discretion of the complaints manager where there is a very good reason for the delay. Where late complaints cannot be accepted, we will tell you and explain why. If possible, we may make an alternative response to help regarding any outstanding issues.</p> <p>Other exclusions or conditions may apply where we have received abusive, excessive, or vexatious complaints. When we do the cases are assessed by HCC’s Customer Feedback Team Leader and if the nature or tone is deemed unacceptable certain restrictions are put in place. Examples include;</p> <ul style="list-style-type: none"> • Mr M, who has issues with alcohol and mental health, was repeatedly contacting the housing office regarding repair matters. During these calls he was abusive towards staff and made threats to them. Restrictions were placed on him, that he could only contact the housing office in the afternoon, as during this time his wife was at home from work (she worked mornings only), and she was able to keep him calm and limit the number of calls he made. • Mr A made a series of complaints about historic repair issues and repeatedly blocked the councils attempts to rectify them. Having exhausted HCC’s complaints process, it was decided to not accept any further repeat complaints but instead give him a single point of contact within the housing service.
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<p>1.9</p>	<p>If a landlord decides not to accept a complaint, a detailed 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.</p>	<p>Yes</p>	<p>If a request for a complaint is declined, we always write to the complaint explaining our decision and detailing what alternative action is being taken or is available. All letters sent to complainants contain details of the complaint process, how a complaint can be escalated and always contain the contact details of the Ombudsman.</p>
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Best practice ‘should’ requirements

<p>Code section</p>	<p>Code requirement</p>	<p>Comply: Yes/No</p>	<p>Evidence, commentary, and any explanations</p>
<p>1.4</p>	<p>Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.</p>	<p>Yes</p>	<p>The feedback process expressly states, “If this is the first time you are reporting an issue to us, we may decide to treat this as a request for service or as a Suggestion.</p> <p>Once recorded, complaints are reviewed by a Customer Feedback Officer who ensures the matter is recorded correctly (Complaint/Concern/Suggestion/Compliment/Service Request).</p>
<p>1.5</p>	<p>Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.</p>	<p>Yes-</p>	<p>Complaints that have been closed with a commitment to carry out work/action are subject to a follow up Customer Satisfaction Survey (Csat). The Customer Feedback Officer contacts the complainant to assess if the follow up work/action has been completed and if they are satisfied. If their response indicates they are dissatisfied and/or the work has not been completed consideration is given to re-opening the complaint for a Stage 2 Review. All letters to a complainant, including the Csat contain contact details for the Housing Ombudsman.</p>


Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>There are multiple ways a resident can make a complaint.</p> <ul style="list-style-type: none"> • Online, by completing and submitting the customer feedback form on our website http://www.hull.gov.uk/ <ul style="list-style-type: none"> o Search for “Customer Feedback & Complaints,” and click on the link or o At the bottom of the main home page click on the orange “Contact Us” button and click on the link for Customer Feedback Scheme • By telephoning the Council’s Contact Centre on 01482 300 300 • By visiting one of the Council’s Customer Service Centres or Information Points • By writing to: FREEPOST RSJC-KKBE-ABXZ, Customer Feedback Team, PO Box 15, HU1 2AB • Via Facebook and Twitter <p>Some residents by-pass the formal complaints process and complain directly to Council Officers. Such complaints are often made to Tenancy officers who record and forward the details to the Customer Feedback Team for assessment and recording on C360.</p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>HCC Corporate Customer Feedback Process is available from the HCC website.</p> <p>http://www.hull.gov.uk/council-and-democracy/consultation-and-feedback/what-happens-my-feedback</p> <p>http://www.hull.gov.uk/sites/hull/files/media/NEW%20-</p>

			<p>%20Hull%20City%20Council%20Corporate%20Customer%20Feedback%20Process%20-%20Sep%202020.pdf</p> <p>The website is designed to make it as accessible as possible while remaining visually interesting and easy to use. It has Accessibility Tools including a Recite Me Accessibility Toolbar and Keyboard shortcuts. https://reciteme.com/user-guide/</p> <p>The Feedback process is also available through the 4 Customer Service Centres and 2 Centres with weekly surgeries.</p> <p>The feedback process is clearly explained with the details given of each stage of the complaint process, timescales, and the escalation process if the complainant remains dissatisfied. The relevant page also has a link to the Housing Ombudsman's and Local Government and Social Care Ombudsman's websites.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>See 2.3</p> <p>The complaint process is easily found by typing "complaint" into the search bar on the Home page. The process is explained with an easy route to recording a complaint.</p> <p>HCC website is due to be changed. Requests have been made for a specific tile/link on the Home page to the feedback/complaints section. This however has been considered and a decision made not to include in the new website design.</p>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act	Yes	<p>See 2.3.</p> <p>All HCC policies are subject to an Equality and Human Rights Impact Analysis. The purpose of carrying out the analysis is to provide evidence that 'due regard' has been paid to the different protected characteristics when making the policy, service, or</p>

	<p>and that complaints handlers have had appropriate training to deal with such requests.</p>		<p>function. It is also to ensure the 3 aims of the general equality duty are met.</p> <p>The HCC Corporate Customer Feedback Process and all our letters to complainants have a section where requests can be made for documents in a different language, alternative format (large print, computer disk, British sign language, Makaton, audio cassette, Braille, face to face conversations, Text phone). See the last page in the Corporate Customer Feedback Process via the link below.</p> <p>Complaints can also be submitted by a 3rd party or representative.</p> <p>http://www.hull.gov.uk/sites/hull/files/media/NEW%20-%20Hull%20City%20Council%20Corporate%20Customer%20Feedback%20Process%20-%20Sep%202020.pdf</p>
<p>2.6</p>	<p>Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.</p>	<p>Yes</p>	<p>See 2.3</p> <p>Information about HCC’s complaints process and the Housing Ombudsman is published on the HCC web site. It’s also detailed in all letters connected with the complaints process. We recognise that actively promoting the complaints process is an ongoing procedure that requires regular updates and refreshes.</p> <ul style="list-style-type: none"> • Residents are not currently advised of the Feedback scheme when they sign their Tenancy Agreement for a property. The only time the Area Teams promote the service is upon receipt of an enquiry. • The Tenant Compact and Involvement Strategy 2018-22 refers to HCC’s Customer Feedback Scheme. Whilst available on HCC’s website it is not known how widely the Compact is read and the reference to the Feedback

			<p>Scheme could easily be missed on Page 30 of a 44-page document. The Tenant Participation Team are currently reviewing and re-writing the Tenant Compact. http://www.hull.gov.uk/sites/hull/files/media/Tenant%20Compact%202018_P8%20web.pdf</p>  <p>Tenant Compact 2018_P8 web.pdf</p> <ul style="list-style-type: none"> In recent months links have been made with the Marketing and Media Officer and agreement made for regular articles concerning the complaints process to be included in Hull Housing News. To also utilise social media to promote the feedback process, including Complaints, Compliments and Suggestions.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Every correspondence with residents connected with the feedback process contains the contact details of the Housing Ombudsman (or Local Government and Social Care Ombudsman).
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Every correspondence with residents connected with the feedback process contains the contact details of the Housing Ombudsman (or Local Government and Social Care Ombudsman).

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	The HCC Feedback process does not expressly detail what action will follow if a complaint is received via a social media channel. However, Comms and Media Officers are aware of the feedback/complaints process and the need to refer a potential complaint to the Customer Feedback Team to assess if it should be recorded as a complaint.
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Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>HCC has an overall lead for complaints – Customer Feedback Team Leader who manages the Corporate Feedback Team (CFT).</p> <p>Neighbourhoods & Housing have a complaints lead; the Customer Feedback Manager (CFM). They have oversight of all N&H feedback. The CFM works with the Customer Feedback Officer (CFO), overseeing and managing all Non-Repairs related feedback.</p> <p>Neighbourhoods & Housing also have an External Relations Manager who works within the Housing Investment Service. All feedback (including complaints) regarding Repairs is overseen by the External Relations Manager. They have a team of external relations officers who manage all Repairs related feedback (including contractual/operational issues).</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All officers in the Corporate Feedback Team, and N&H Feedback Team (both Repairs and Non-Repairs) have extensive public and private sector experience dealing with the public and managing complaints. This includes managing investigations, dispute resolution and effective remedy. Relevant training for housing disputes and complaints is also accessed online.

			Both the Corporate Feedback Team and N&H Feedback Team are independent of any other area of HCC and do not have any conflict of interest with other areas.
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Best practice 'should' requirements


Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly 	Yes	See 3.2. The Customer Feedback Manager and External Relations Manager have access to all levels of management within N&H and frequently liaises with officers to resolve complaints. They have the autonomy to resolve complaints quickly and fairly with the authority to award discretionary payments (£500 limit). Where appropriate they may refer cases for consideration of a higher value to an appropriate manager.

Section 4 - Complaint handling principles

Mandatory 'must' requirements



Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or	Yes	HCC keep extensive records of interaction with residents and work undertaken at their homes (NEC and HIS Customer Records). Any work undertaken is independent of the complaints process. The complaints process is always available to residents and action to address a Service Request or Concern does not impact on their ability to record a Complaint.

	<p>result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>		<p>HCC does not have an informal complaints stage.</p> <p>Once a resident has recorded a complaint and it is registered on the HCC feedback system Contact360 (C360) they are sent an automated acknowledgement of their complaint with reference number. This acknowledgement is instant and thus within 5 days.</p> <p>Residents will then either receive a letter detailing the result of their complaint within 10 days or a letter stating we need more time to complete the investigation. They receive updates every 10 days until the complaint is finalised.</p>
<p>4.2</p>	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	<p>Yes</p>	<p>Once a complaint is recorded on C360 it sends automated e mail to the resident with the complaint reference number and details of how the complaint will be investigated with time scales. It also contains details of the complaints process, how a complaint can be escalated and contact details for the Ombudsman.</p> <p>It does not set out our understanding of the complaint and the outcomes the resident is seeking. This would require a separate letter/e mail which would duplicate some of the automated C360 response. The automated process is intended to ensure compliance with the Housing Ombudsman's Complaint Handling Code and provide a professional and consistent response to members of the public.</p> <p>At Stage 1 Actioning Officers may contact a resident to discuss their complaint, ask for further information, explain HCC's policies, and offer an opportunity to respond. Each case is considered on its merits and where required clarity, or further information is sought from the complainant. Stage 1 response letters set out HCC's understanding of the issues within the complaint and address each issue within the response.</p>

<p>4.6</p>	<p>A complaint investigation must be conducted in an impartial manner.</p>	<p>Yes</p>	<p>Complaints are investigated by an officer in a supervisory position to the officer subject of the complaint or who was involved in the action /lack of action which is subject of the complaint. Whilst in a supervisory position the Actioning officer is from the area of business subject to the complaint. This ensures ownership, easy access to officers with knowledge of the circumstances and an understanding of the issues involved.</p>
<p>4.7</p>	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	<p>Yes</p>	<p>The complaint handler (Actioning Officer) is expected to investigate a complaint impartially, fully, independently, and confidentially (where possible). Guidance and advice are available from the Customer Feedback Team and the locally produced “N&H Toolkit for Complaint Handling).</p> <div style="text-align: center;">  <p>N&H Toolkit for Complaint Handling.d</p> </div>
<p>4.11</p>	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication</p>	<p>Yes</p>	<p>When a resident requests contact arrangements outside the normal time frames, every effort is made to meet the request. This applies to both time frames and method of contact.</p>
<p>4.12</p>	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	<p>Yes</p>	<p>If a staff member is complained about, they are asked their understanding of events and circumstances as part of the initial investigation.</p> <p>The resident is informed of the Stage 1 decision in writing. Contained within this response are details of how they can appeal the decision to a Stage 2 Review, a Members Panel, a Tenants Panel, or the Ombudsman. If they choose to appeal, they are asked to submit their appeal with supporting reasons. This is their opportunity to comment on any adverse findings before the final decision and closing of the investigation.</p>

<p>4.13</p>	<p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint</p>	<p>Yes</p>	<p>The complaints process details a complainant has 28 days from the date of their Stage 1 response letter and Stage 2 Review letter to request escalation to the next stage of the complaints process. Every letter sent to the resident provides the escalation process with timescale.</p> <p>HCC do consider requests for escalation that are outside the 28 day timescale. This may be due to the complainant being unable to make the request within 28 days e.g. due to hospitalisation, or if the request is reasonable and will potentially lead to a service improvement. Each case is assessed on its merits.</p>
<p>4.14</p>	<p>A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.</p>	<p>Yes</p>	<p>HCC takes a reasoned and pragmatic approach to requests for a Stage 2 Review. The reasons for declining a Stage 2 Review (and Members Panel) are in addition to the reasons for declining the initial recording of a complaint;</p> <p><i>(If this is the first time you are reporting an issue to us, we may decide to treat this as a request for service or as a concern. You should make us aware of your complaint within 12 months of the incident happening or within 12 months from when you first became aware that you had reason for complaint. If your complaint is received later than this, we may not be able to be fully investigate it.)</i></p> <p>This reflects the time and attention a complaint has already been given. It also ensures the escalation to a Stage 2 Review is justified and is not a speculative approach by a resident to achieve the outcome they desire.</p> <p>For a Stage 2 Review request to be granted the complainant is advised they “must tell us why. We will then consider whether a different person should look at your case again. You must provide reasons or further information in order for us to progress your complaint to Stage 2”.</p> <p>The criteria when considering a Stage 2 request are;</p>

			<ul style="list-style-type: none"> • What new information or reason has been provided as to why a stage 2 should be given • Whether the Stage 1 response answers all matters raised in the complaint • Whether we have put things right and apologised where appropriate • Any excessive time delays which weren't communicated to the complainant • That the Corporate Feedback Process has been followed correctly – this includes sending a written response on the correct template (the template provides details of escalation options and the Ombudsman) • Quality of the Stage 1 response and whether it meets the standard expected • Seriousness of the matter raised. • Specific request from the service area to progress the complaint to Stage 2. <p>The escalation process to a Members Panel is, like the process for a Stage 2 Review, an assessment of the complaint and the response provided. The Stage 1 and Stage 2 processes must be completed and the Area Director/senior manager for the service area is satisfied with the complaint investigation and responses given. The Corporate Feedback Team will then assess the request against the Members Panel criteria;</p> <ol style="list-style-type: none"> 1. A Council policy has not been properly or fairly applied and this has not been corrected 2. The procedures operated by the Council are inadequate or inappropriate and reasonable improvements have not been made 3. There has been an operational failure which has not been resolved or is being repeated
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			<p>4. The complaint highlights a serious situation or significant errors that need to be brought to the attention of members in order to get an independent view of what has happened.</p> <p>5. It will not be appropriate for a panel to consider any matter that has been decided by or is for a more appropriate body</p> <p>6. A Member Panel is not able to overrule the professional judgement of a qualified specialist.</p>
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	Records of all correspondence are kept on HCC computer records (W:\Customer records) and Contact 360.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	<p>HCC has Vexatious and Persistent Complaints and Complainers guidance.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Vexatious complaints procedure flowchart (</p> </div> <div style="text-align: center;">  <p>Vexatious & persistent complaints</p> </div> </div>

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	At Stage 1 Actioning Officers may contact a resident to discuss their complaint, ask for further information, explain HCC’s policies, and attempt to manage their expectations regarding the potential outcome of their complaint. Due to the volume of complaints this does not always occur. Where the details of a complaint and the outcome a resident is seeking are

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			straightforward then it is unlikely the Actioning Officer will contact them. This is to make best use of the Actioning officers time and save contacting the resident to discuss what is already apparent.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Each stage of the complaint process is subject to time constraints. Complaints are generally resolved at Stage 1 without the requirement to escalate to Stage 2. Stage 1 complaints should be answered within 10 working days. Stage 2 Reviews should be answered within 20 working days. 2019/20 - 91.1% of all N&H complaints resolved at Stage 1. 2020/21 - 91.5% of all N&H complaints resolved at Stage 1. 2021/22 - 91.5% of all N&H complaints resolved at Stage 1.
4.5	Landlords should 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 where this is reasonable.	Yes	This is accepted in the feedback policy. Permission to share information is required for information to be shared with a 3 rd party.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Where necessary the advice of HCC Legal Services is sought to ensure HCC acts lawfully. Where appropriate HCC will explain to the resident their legal responsibilities and entitlement. In addition, HCC may advise the resident to seek legal advice, either from a solicitor or from a community-based organisation such as Citizens Advice.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Correspondence regarding complaints do not generally name individual officers unless their identity and relationship within the complaint are known.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Residents are updated on the progress of a complaint investigation. Updates are provided at intervals of 10 days.

<p>4.16</p>	<p>Landlords should seek feedback from residents in relation to the landlord’s complaint handling as part of the drive to encourage a positive complaint and learning culture.</p>	<p>Yes</p>	<p>The annual STAR survey is carried out to assess residents’ satisfaction with a wide range of N&H services. Results from the 2022/23 survey relating to complaints are shown below. 2022/23 shows a marked improvement in satisfaction rates with an increase from 33.1% in 2021/22 to 55% in 2022/23 in overall satisfaction with the handling of complaints.</p> <div data-bbox="1189 430 2031 901"> <p>Q12) Do you know how to make a complaint to Hull City Council regarding the Neighbourhoods and Housing Service?</p> <table border="1"> <tr> <td>Yes</td> <td>754 (65.6%)</td> </tr> <tr> <td>No</td> <td>395 (34.4%)</td> </tr> </table> <p>Q13) How satisfied or dissatisfied are you with the Housing Service's approach to handling complaints?</p> <table border="1"> <tr> <td>Very satisfied</td> <td>269 (29.7%)</td> </tr> <tr> <td>Fairly satisfied</td> <td>283 (29.2%)</td> </tr> <tr> <td>Neither satisfied nor dissatisfied</td> <td>233 (29.2%)</td> </tr> <tr> <td>Fairly dissatisfied</td> <td>67 (6.9%)</td> </tr> <tr> <td>Very dissatisfied</td> <td>66 (6.9%)</td> </tr> </table> <p>Overall Satisfaction</p> <table border="1"> <tr> <td>Very satisfied</td> <td>474</td> <td>Neither satisfi...</td> <td>128</td> </tr> <tr> <td>Fairly satisfied</td> <td>466</td> <td>Fairly dissatisf...</td> <td>84</td> </tr> <tr> <td></td> <td></td> <td>Very dissatisf...</td> <td>64</td> </tr> </table> <p>Last Year: 33.1%</p> <p>HouseMark: lower, median, upper</p> </div> <p>The Customer Feedback Officer sends a Customer Satisfaction Survey (CSat) to all complainants. This is to assess their satisfaction with the complaint process rather than the outcome. Experience however indicates the results from the CSat are dictated by the outcome of the complaint. The CSat and results are under review to determine how best to develop and use the results to improve service.</p>	Yes	754 (65.6%)	No	395 (34.4%)	Very satisfied	269 (29.7%)	Fairly satisfied	283 (29.2%)	Neither satisfied nor dissatisfied	233 (29.2%)	Fairly dissatisfied	67 (6.9%)	Very dissatisfied	66 (6.9%)	Very satisfied	474	Neither satisfi...	128	Fairly satisfied	466	Fairly dissatisf...	84			Very dissatisf...	64
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Neither satisfied nor dissatisfied	233 (29.2%)																												
Fairly dissatisfied	67 (6.9%)																												
Very dissatisfied	66 (6.9%)																												
Very satisfied	474	Neither satisfi...	128																										
Fairly satisfied	466	Fairly dissatisf...	84																										
		Very dissatisf...	64																										

4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Actioning Officers are all managers in the area subject of the complaint. They know and understand the officers involved in the complaint and offer guidance, training and support where required. Where learning and/or service improvements from a complaint are identified they are disseminated by the Customer Feedback Team.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	All HCC policies are subject to an Equality and Human Rights Impact Analysis. The purpose of carrying out the analysis is to provide evidence that 'due regard' has been paid to the different protected characteristics when making the policy, service, or function. It is also to ensure the 3 aims of the general equality duty are met. The Council has adopted the Local Government Ombudsman's (LGO) definition of "unreasonable complainant behaviour" and "unreasonable persistent complaints." The Council defines unreasonably persistent and unreasonable behaviour complainants as those complainants who, because of the frequency or nature of their contacts with the Council, hinder its consideration of their or other people's complaints. The HCC Vexatious Complaints and Complainers Guidance states; <ul style="list-style-type: none"> • <i>If a person is identified as being vulnerable, consider the use of an independent advocate to assist.</i> • <i>In deciding which restrictions are appropriate, careful consideration will be given to balance the rights of the individual against those of other complainants and the need for the Council to provide its services.</i> http://theintranet.hullcc.gov.uk/big-picture/corporate-support-services/corporate-customer-feedback-team/corporate-feedback-

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Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>HCC's feedback policy states complaints should be resolved within 10 working days.</p> <p>Neighbourhoods & Housing works to an internal KPI target of 75% of all Stage 1 complaints resolved within 10 working days.</p> <p>The view within Neighbourhoods & Housing is whilst it is desirable to meet the HO timescales it is preferential to conduct a thorough and proper investigation rather than a hasty investigation to meet the timescales.</p> <p>Complaint response data;</p> <p><u>2019/20</u> Stage 1 – 71.2% completed within 10 working days</p> <p><u>2020/21</u> Stage 1 – 74.7% completed within 10 working days</p> <p><u>2021/22</u> Stage 1 – 76% completed within 10 working days</p>

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<p>5.5</p>	<p>A complaint response must be sent 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 expeditiously with regular updates provided to the resident.</p>	<p>Yes</p>	<p>Responses are sent once the investigation is complete and a determination made as to the result.</p> <p>A record is kept of any Non-Repairs actions HCC has committed to taking as part of the complaint resolution. Follow up contact is made with the Actioning Officer to check if the work has been completed.</p> <p>A secondary check is made with all residents via the CSat survey. This provides them an opportunity to respond and inform the CFO if any actions remain outstanding, or they remain unhappy.</p>
<p>5.6</p>	<p>Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>	<p>Yes</p>	<p>This is included in Stage 1 and Stage 2 responses.</p>
<p>5.8</p>	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	<p>Yes</p>	<p>This is included as all Stage 1 and Stage 2 responses are written on templates which include all the information required by the Code.</p>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1 it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	<p>If a resident is unhappy at the Stage 1 response, they can request a Stage 2 Review. The criteria for accepting/excluding a Stage 2 Review are;</p> <ul style="list-style-type: none"> • What new information or reason has been provided as to why a stage 2 should be given • Whether the Stage 1 response answers all matters raised in the complaint • Whether we have put things right and apologised where appropriate • Any excessive time delays which weren't communicated to the complainant • That the Corporate Feedback Process has been followed correctly – this includes sending a written response on the correct template (the template provides details of escalation options and the Ombudsman) • Quality of the Stage 1 response and whether it meets the standard expected • Seriousness of the matter raised. • Specific request from the service area to progress the complaint to Stage 2. <p>Full letters of explanation, including the option to contact the Ombudsman are sent to every complainant who has a request for escalation refused.</p> <p>2021/22 – 115 requests for a Stage 2 Review. 77 accepted, 38 refused.</p>

<p>5.10</p>	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	<p>Yes</p>	<p>On receipt of a Stage 2 Review request a letter is sent to the resident.</p> <ul style="list-style-type: none"> • If the request is accepted an acknowledgement letter is sent which outlines; <ul style="list-style-type: none"> ○ HCC’s understanding of the complaint ○ the reasons why the resident is requesting a Stage 2 Review ○ that the Review will be conducted by a more senior officer than who investigated the Stage 1 complaint ○ they will receive a response once the Review is completed. This will be within 20 working days • If the request is declined a more detailed letter is sent <ul style="list-style-type: none"> ○ acknowledging the request ○ outlining HCC’s understanding of the complaint and why the resident is requesting a Stage 2 Review ○ explaining why the request is declined <p>All letters provide details of HCC’s complaints process and contact details for the Ombudsman.</p> <p>Review Officers do not routinely contact residents to discuss</p>


			the issues in the Stage 2, gain clarity over the outcome they are seeking, or to manage the residents' expectations. This is an area for improvement.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is in accordance with the complaints process.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is always a different and more senior officer.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>This is in accordance with HCC's complaints process.</p> <p>Stage 2 Reviews are investigated without delay with a premise that the timescale is only extended when we cannot answer the points in the complaint and the extension adds value to the final answer.</p> <p>There are occasions where Reviews must be extended due to delays in Actioning officers investigating and sending response to the Customer Feedback Team. This is an area for improvement.</p> <p>When a timescale has been extended, we send a 'holding letter' explaining that we have been unable to provide an answer within 20 days and are still carrying out the Review.</p> <p>Stage 2 Review response data; <u>2019/20</u> Stage 2 – 47.7% completed within 20 working days</p>


			<p><u>2020/21</u> Stage 2 – 83.3% completed within 20 working days</p> <p><u>2021/22</u> Stage 2 – 58% completed within 20 working days</p> <p>We do not have data for extension timescales</p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>This is included as all Stage 1 and Stage 2 responses are written on template letters which include all the information required by the Code.</p> <p>The letters contain details of how to request a Members Panel, ask a Designated Person to act on the resident’s behalf and details of the Designated Tenants Panel. They also contain the contact details of the Housing Ombudsman. The letter asks the resident to note; “Although you can contact the Housing Ombudsman at any time during your complaint for help and advice, they will not normally investigate a complaint which has not completed the Council’s complaints procedure.”</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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<p>5.17</p>	<p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.</p>	<p>Yes</p>	<p>At present HCC have 3 stages to Housing Complaints;</p> <ul style="list-style-type: none"> • Stage 1 – investigation of initial complaint • Stage 2 – where a resident is unhappy at the resolution of Stage 1, they can submit additional information or reasons why they are unhappy and the request for a Stage 2 will be considered by the N&H Customer Feedback Manager. • Stage 3 - Members Panel – where a resident is unhappy after Stage 2, they can request a Members Panel; a panel consisting of elected members. The request is considered by the HCC Customer Feedback Team Leader against criteria and a determination made as to whether their complaint qualifies for a Members Panel. If it does qualify the resident is invited to make their case. They can also bring a friend or family member. They do not have to attend in person. In addition to representing themselves residents are de facto represented in this process by elected Members. <p>The existence of the Members Panel has been discussed with Members and it is their strong opinion that the Panel should continue as the third stage of the complaints process.</p> <p>Housing complaints differ from all other complaints to HCC as there is a separate and additional course available to council tenants who remain dissatisfied. After completion of Stage 2 (and possibly a Members Panel) the tenant can request assistance from a 3rd party to resolve their dispute. The tenant can contact;</p> <ul style="list-style-type: none"> • A Designated Person’ – someone who can try to help resolve the complaint or help refer the tenant, with their consent, to the Housing Ombudsman Service/Local Government Ombudsman. This can be:
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		<ul style="list-style-type: none"> ○ Their local Councillor ○ Their local Member of Parliament ○ Their local Independent Tenants' Complaints Panel. <p>The purpose of the Panel is to take an independent role to locally resolve complaints from Hull City Council tenants. Where local resolution is unsuccessful the Panel can, where it believes there is justification, refer complaints to the Housing Ombudsman Service. The Panel does not have powers but will review a case and make suggestions and recommendations to the Neighbourhood & Housing Department.</p> <div style="text-align: center;">  <p>Review of TOR agreed at full meeting</p> </div> <p>HCC has an active Tenants Participation Team who work closely with tenant and resident's groups. Tenants receive regular newsletters and have access to a wide variety of information on housing matters. The excellent work of the Participation Team and the relationship with tenants has been recognised nationally by TPAS.</p> <p>The 'key to our future' document, known as the Tenants Compact, sets out what we do for our tenants, what they can expect from us and what is expected of tenants. This document is currently under review by the Tenant Participation Team.</p> <p>Further information on the work of the Tenant Participation Team and the Tenants Compact is in the links below;</p> <p>http://www.hull.gov.uk/housing/council-tenants-and-</p>
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			leaseholders/tenant-participation http://www.hull.gov.uk/sites/hull/files/media/Tenant%20Compact%202018_P8%20web.pdf  Tenant Compact 2018_P8 web.pdf
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	This is included as all Stage 1, Stage 2 Review and Members Panel responses are written on template letters which include all the information required by the Code.

Best practice ‘should’ requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Partial	Letters notifying a complainant of an extension beyond 20 working days are always sent. Whilst we advise the complainant of an extension, we do not always seek their agreement. To do so would serve no benefit as the investigation is not complete and any timeframe for completion is in the hands of the investigator. Investigations are conducted

			expeditiously, and any delays are due to the complexity of the investigation and the time spent gathering and assessing the evidence before responding. In more complex cases there is often regular interaction with the complainant. In these cases extension are often discussed and agreed.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	The Housing Ombudsman's contact details are provided on every letter (including extension letters) sent to a complainant.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	<p>The history behind a complaint is considered when determining how best to address the issues and resolve. This applies to individuals whose complaint history is available via the Customer Records.</p> <p>Quarterly Customer Feedback Insight Reports are produced by Repairs and Non-Repairs, with a composite report produced for all N&H. This identifies common trends and patterns in complaints and seeks to identify means to address the root cause and improve performance. The report is presented to N&H SMT with Recommendations for service improvements.</p>
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	When the additional complaint is similar to or connected to an existing complaint then the response is incorporated into one composite response. If the issues raised are a separate matter, then a new additional complaint is opened. This ensures the appropriate officer investigates each element of the complaints and the total investigation does not lose focus or direction. It also ensures the original complaint is dealt with without delay.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Partial	Letters notifying a complainant of an extension beyond 10 working days are always sent. Whilst we advise the complainant of an extension, we do not always seek their agreement. To do so would serve no benefit as the investigation is not complete and any timeframe for completion is in the hands of the investigator. Investigations are conducted expeditiously, and any delays are due to the complexity of the investigation and the time spent gathering and assessing the evidence. In more complex cases there is often regular interaction with the complainant. In these cases, extensions are often discussed and agreed.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	The Housing Ombudsman's contact details are provided on every letter (including extension letters) sent to a complainant.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	The HCC Members Panel Review (MPR) procedure is available on the HCC intranet. Relevant extract below; The Customer Feedback Team will acknowledge the request within 3 working days and inform the complainant that a decision will be made within the next 20 working days. The Corporate Feedback Team Leader will then begin the MPR assessment process liaising with the service area as appropriate, to establish if any of the criteria for a member's panel are met. If the investigation is likely to go over the 20 working days timescale, the complainant will be kept updated

		<p>as to when they can expect a response.</p> <p>If the Corporate Feedback Team Leader decides that none of the criteria are met for a MPR to proceed, the complainant will be sent a letter confirming this with a summary of the reasons why. The letter will outline the next steps the complainant can take should they remain unsatisfied with the decision. In most cases this will be the relevant Ombudsman. Once a decision has been made to refuse a MPR there is no further right of appeal</p> <p>If the Corporate Feedback Team Leader decides that one or more of the criteria for holding a panel are met, the complainant will be sent a letting confirming their MPR request has been accepted with the reasons why. It will also inform them that Committee Services will be in touch to arrange a suitable date and time for the hearing.</p> <p>The Assistant Director of the service area will be informed of the decision and will receive a copy of the letter and is expected to nominate a member of staff involved with the complaint to attend the hearing and liaise with CFT to produce a pack of documents for the hearing. Committee Services will be informed and given all relevant details of the complaint and will then begin to arrange a suitable date and time for the hearing with the elected members and the complainant. A date for the panel must be set within 20 Working Days of Committee Services receiving the details from the Corporate Feedback Team. The Panel should be set within 40 working days of the acceptance letter.</p> <p>http://theintranet.hullcc.gov.uk/big-picture/corporate-support-services/corporate-customer-feedback-team/corporate-feedback-police-4</p>
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5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	The Housing Ombudsman's contact details are provided on every letter (including extension letters) sent to a complainant.
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Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	<p>Every complaint is finalised by a decision that is Upheld/Partially Upheld/Not Upheld.</p> <p>Where a mistake or poor service is identified this is acknowledged in the resolution letter with the action to put right the mistake/situation.</p> <p>The Customer Feedback Team make a record of any action agreed to rectify a mistake/poor service and follow up checks are made approx. 4 weeks after the commitment to establish if the actions have been carried out.</p>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	<p>Proportionate remedies are offered where a complaint is Upheld or Partially Upheld. These can range from an apology, an agreement to carry out or complete repair work, and the payment of appropriate monetary compensation.</p> <p>Compensation Guidelines for managing N&H complaints have been drafted and are due to be considered by N&H SMT.</p>

			Officers are aware that they cannot act outside of policies and promise residents outcomes they are not entitled to or cannot be delivered.
6.5	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.	Partial	<p>Remedy offers set out what will happen, and where possible provide dates for appointments to assess or carry out work. This is not always practicable. The Covid19 pandemic has resulted in a large backlog of work, mainly due to a shortage of labour and materials. In these instances it has been impossible to provide dates for work to be completed as HCC suppliers and contractors have been unable to provide realistic timescales.</p> <p>A record is kept of any Non-Repairs actions HCC has committed to taking as part of the complaint resolution. Follow up contact is made with the Actioning Officer to check if the work has been completed.</p> <p>This approach is not routinely followed by Repairs and is an area for improvement.</p> <p>A secondary check is made with all residents via the CSat survey. This provides them an opportunity to respond and inform the CFO if any actions remain outstanding, or they remain unhappy.</p>
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Compensation Guidelines for managing N&H complaints have been drafted and are due to be considered by N&H SMT. The draft Guidelines include statutory payments, quantifiable losses, the time and trouble, distress and inconvenience caused.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	<p>Quarterly Customer Feedback Insight Reports are produced by Repairs and Non-Repairs, with a composite report produced for all N&H. This identifies common trends and patterns in complaints and seeks to identify means to address the root cause and improve performance. The report is presented to N&H SMT with Recommendations for service improvements.</p> <p>The Insight Reports are shared with contractual partners and Customer Services is a standing agenda item in joint operational meetings. This provides the opportunity to discuss reoccurring themes/trends with contractors, address concerns and initiate action to improve services.</p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Where appropriate a complaint will be referred to HCC Legal Services for advice and guidance. This aids the final resolution of a complaint and ensures a resident's rights are met whilst protecting HCC.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	<p>Quarterly Customer Feedback Insight Reports are produced by Repairs and Non-Repairs, with a composite report produced for all N&H. This identifies common trends and patterns in complaints and seeks to identify means to address the root cause and improve performance. The Customer Feedback Manager periodically presents the N&H Insight Report to the independent Designated Tenants Complaints Panel. The Panel is made up of local tenants who review complaints referred to them by residents or a Designated Person, and act as a critical friend. This HO Self-Assessment is also presented to the Panel for comments and suggestions.</p> <p>The N&H Annual Report 2020/21 refers on Page 7 to the number of complaints received compared to the previous year and provides performance figures for answering a Stage 1 complaint within 2 weeks. 1/22</p> <p>Hull Housing News is published quarterly and distributed to HCC tenants. The newsletter regularly contains articles relating to the feedback process and encourages residents to contribute feedback via the Council's scheme. It also contains articles relating to feedback such as "You Said – We Did" which often originate from a complaint which has identified how a policy or process has been improved following the complaint process.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	The Area Director acts as the N&H lead for all feedback (including complaints). He ensures a quarterly Customer Feedback Insight Report is received by SMT each quarter. The reports provide performance data and trends and identifies areas for attention and/or improvement.
7.4	As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders, Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge	Yes	The Area Director acts as the N&H lead for all feedback (including complaints). He ensures a quarterly Customer Feedback Insight Report is received by SMT each quarter. The reports provide performance data and trends and identifies areas for attention and/or improvement. Where appropriate it provides details of specific cases of note, including all adverse finds by the Ombudsman (both Housing and LGO). Recommendations are made in the report and, where agreed by SMT, tracked via future reports. The annual self-assessment is reported on and considered by SMT.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Full HCC feedback reports are presented monthly to HCC CST by the Council's Customer Feedback Team Leader. Abridged feedback data is available on the HCC website. http://ask.hull.gov.uk/council-and-democracy/consultation-and-feedback/monthly-feedback-performance-statistics

			<p>Quarterly Customer Feedback Insight Reports are produced by Repairs and Non-Repairs, with a composite report produced for all N&H. This identifies common trends and patterns in complaints and seeks to identify means to address the root cause and improve performance. The report is presented to N&H SMT with Recommendations for service improvements.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>N&H’s approach to complaint handling sits within the overall N&H Business Plan 2021-26. The business plan sits below and contributes to the Council’s corporate plan and Hull’s City Plan and sits alongside the Housing Strategy for Hull.</p> <p>N&H vision is; Building great places together, putting residents first.</p> <p><u>Culture & values</u> HCC has corporate values and behaviours.</p> <ul style="list-style-type: none"> • People first - We strive to improve the quality of life for all people and families. • Respect - We treat everyone with respect, integrity, honesty and fairness. • Learning - We are curious and open to different ideas, we value feedback and constructive challenge. • Ambition - We are ambitious for our city and push the boundaries of what we can achieve. • Partnership - We work closely together across communities, the council and with our partners. <p><u>Behaviours</u></p> <p>Curious, Integrity, Approachable, Courageous, Honest, Thankful, Positive, Caring, Ambitious, Inclusive, Listening, Innovative, Collaborative, Responsible, Reliable</p> <p>In addition to the corporate values and behaviours, N&H have</p>

		<p>identified additional values / behaviours which are also important. They are:</p> <ul style="list-style-type: none"> • To be an intelligence led, data driven and modern service, continually embracing change. • To ensure we are a customer centric organisation, valuing tenants & residents as customers. • To communicate well, within and beyond our organisation. <p>The above fits well with the CIH Professional Standards 2021: integrity; inclusive; ethical; knowledgeable; skilled; advocate; leadership.</p> <p>N&H complaint handling follows the full HCC approach to feedback and complaints.</p> <p>https://www.hull.gov.uk/council-and-democracy/consultation-and-feedback/customer-feedback-and-complaints</p> <p>There is a collaborative approach to dealing with complaints, with a Customer Feedback Manager responsible for standards, performance, the coordination of efforts and dissemination of good practice. Where a complaint spans several different business areas a lead Actioning Officer is identified to own the complaint, collate responses from different officers and draft a combined response. Where necessary this role is performed by the Customer Feedback Officer of Manager.</p>
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This Self-Assessment, and archived assessments from 2020/21 and 2021/22
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	There has been no significant N&H re-structure to require a specific Self-Assessment, but this requirement is noted and will be actioned if the need arises.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>The AD for N&H discusses the Self-Assessment and its outcomes with the Portfolio Lead for Housing and Homelessness. – Jan Loft.</p> <p>The Self-Assessment is published on the HCC website.</p> <p>HCC does not produce an annual report. N&H does produce an annual report. To date this has not referred to the Self-Assessment. This requirement of the Code is noted, and the AD made aware for future reports.</p> <p>The Customer Feedback Team Leader submits an annual report to HCC Audit Committee. This includes high level data regarding all types of feedback received by HCC. Future reports will include the HO SA.</p>