Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: '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.'	Yes	Complaints regarding your Council property Hull Customer feedback and complaints Hull What happens to my feedback Hull	Hull City Council's Customer Feedback Scheme uses the HOS definition for all complaints relating to a Council property. The Local Government & Social Care Ombudsman's (LGSCO) definition of a complaint; "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 or group of individuals.' Is used for all other complaints.
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 complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	HIS and Non-Repairs records record instances where complaints have been recorded when the word 'complaint' has not been used.	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.

			Records are kept of MP and Cllr enqs. Where the substance of the enquiry is a complaint then a complaint is recorded and investigated. CCF590629237 CCF582191981 CCF594308664 CCF559839502	3rd party correspondence (including those from MP's and Cllr's) are assessed. If they amount to a complaint, they are recorded as such, and investigated as per the feedback policy.
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	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. Once recorded, complaints are reviewed by a Customer Feedback Officer who ensures the matter is recorded correctly (Complaint/Concern/Sugge stion/Compliment/Service Request).	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	See 1.3	

				I
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	Csat survey letters and responses. The Csat letters contain contact details for HCC with details of how to make a complaint, and contact details for the HOS.	Where a survey indicates potential dissatisfaction with a service, and the response contains sufficient information to identify the responder, then a follow up enquiry is made. This is to obtain further details and determine how any issues can be addressed. If required a service request will be raised, and if warranted a complaint will be recorded. Complaints that have been closed are followed up with a Customer Complaint Feedback Survey (CCFS). The Customer Feedback Officer (CFO) contacts the resident to assess their satisfaction with the complaints process and if any follow up work/action has been completed. If their response indicates they are dissatisfied and/or any work has not been completed consideration is given to reopening the complaint for a Stage 2 Review. All letters to a resident, including the CCFS contain contact

		details for the Housing Ombudsman.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Corporate feedback scheme The Intranet (hullcc.gov.uk) Complaints regarding your Council property Hull	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 1 st time, then it may be considered as a request for service rather than a complaint. This is in keeping with advice issued by the Housing Ombudsman. The resident is informed if their issue is being recorded as something other than a complaint.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago.	Yes	Corporate feedback scheme The Intranet (hullcc.gov.uk) Complaints regarding your Council property Hull	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

- Legal proceedings have started. This
 is defined as details of the claim, such
 as the Claim Form and Particulars of
 Claim, having been filed at court.
- Matters that have previously been considered under the complaints policy.

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 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.

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;

 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.
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	Corporate feedback scheme The Intranet (hullcc.gov.uk) Complaints regarding your Council property Hull	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 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.
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	Corporate feedback scheme The Intranet (hullcc.gov.uk) CCF618370865	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.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Corporate feedback scheme The Intranet (hullcc.gov.uk)	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.

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	Contact us — Hull City Council Text Contact us Co	There are multiple ways a resident can make a complaint. Online, by completing and submitting the customer feedback form on our website http://www.hull.gov.uk/ 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 Some residents by-pass the formal complaints process and complain directly to Council

				Officers. In these instances, the Officers record the details and forward them to the Customer Feedback Team. CFOs also receive complaint reports via e mail (both individually and to respective SPOC Box's). All reports are assessed by CFO's and. if they fit the definition as per 1.2, are recorded as complaints and investigated. Complaints will also be accepted from third parties acting on behalf of the customer, such as Councillors and MP's
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	All N&H staff have been briefed on the feedback process and encouraged to complete the Corporate Feedback and Complaints Awareness training on the HCC training database. Corporate Feedback and Complaints Awareness training on the HCC training database.	

			regularly included in the Area Directors weekly message to all N&H officers.	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Quarterly and annual feedback reports detail the number of complaints, but no importance is placed on the actual numbers, and if they are increasing or decreasing. No adverse inferences are taken from high/increasing complaint trends other than understand the reasons for the complaints and how to address them.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	HCC Corporate Customer Feedback Process is available from the HCC website. 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/

				Recite Recite Recit
				The Feedback process is also available through the 4 Customer Service Centres and 2 Centres with weekly surgeries.
				The feedback process is clearly explained with the details given of each stage of the complaint process, timescales, and the escalation process if the resident remains dissatisfied. The relevant page also has a link to the Housing Ombudsman's and Local Government and Social Care Ombudsman's websites.
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	What happens to my feedback Hull	The feedback process is clearly explained with the details given of each stage of the complaint process, timescales, and the escalation process if the resident remains dissatisfied. There is also a link for customers to download a document detailing the Customer Feedback Process.

				The relevant page also has a link to the Housing Ombudsman's and Local Government and Social Care Ombudsman's websites.
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	Residents can authorise a representative to deal with their complaint on their behalf. This is often through their MP or Councillor but can be any person they chose. If they nominate someone to represent them, then 3 rd party consent to share is obtained before sharing personal information. CCF617191910 CCF622430881 CCF615337229	
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	What happens to my feedback Hull	Every correspondence with residents connected with the feedback process contains the contact details of the Housing Ombudsman (or Local Government and Social Care Ombudsman). Details are also available on the HCC web site.

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	HCC has an overall lead for complaints – Customer Feedback Team Leader who manages the Corporate Feedback Team (CFT). Each Directorate within HCC is responsible for investigating and managing complaints in its area. 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. 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).	

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	Customer Feedback Team Leader Job Description
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	All N&H staff have been briefed on the feedback process and encouraged to complete the Corporate Feedback and Complaints Awareness training on the HCC training database. Corporate Feedback and Complaints Awareness training on the HCC training database. All officers actively involved in investigating and responding to complaints are regularly sent guidance and learning from the HOS. This includes Insight Reports, Spotlight Reports and other articles containing learning and advice. They have also been sent a locally produced 'Complaints Toolkit' with advice and guidance on how to investigate a complaint and respond.

The importance of complaints and taking the learning from them is regularly included in the Area Directors weekly message to all N&H officers.	
Quarterly Customer Feedback Insight Reports are circulated to all officers involved in the feedback process, including all those who investigate and respond to complaints.	

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	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	HCC has 1 feedback and complaints process for all feedback. This is irrespective of under which Ombudsman has responsibility. Residents are not regarded or treated differently if they make a complaint.
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	Yes	Customer feedback and complaints Hull What happens to my feedback Hull	HCC does not have a Stage 0 or informal complaint stage. Complaints are attempted to be resolved at the earliest stage possible. All Actioning Officers will

	(such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.		Complaints regarding your Council property Hull	ring the resident recording a complaint to introduce themselves and obtain full details of the complaint. Any complaints that can be resolved immediately are done so.
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	Customer feedback and complaints Hull Complaints regarding your Council property Hull	HCC has a 2 stage complaints process. Housing complaints differ from all other complaints to HCC as there is a separate course available to council tenants who remain dissatisfied. After completion of Stage 2 the tenant can request a hearing in front of the independent Designated Tenants Complaints Panel. 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.

				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.
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	HCC does not use a 3 rd party to respond to complaints.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	HCC does not use a 3 rd party to respond to complaints.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	All resident in complaints (Stage 1 and Stage 2) are sent a letter which details HCC's understanding of their complaint and what outcome they are seeking. If detailed are unclear then the resident is contacted for clarification. At both Stage 1 and Stage 2 Actioning Officers contact the resident to discuss their complaint,

				ask for further information, explain HCC's policies, and understand what outcome the resident is seeking.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	All resident in complaints (Stage 1 and Stage 2) are sent a letter which details HCC's understanding of their complaint and what outcome they are seeking. If detailed are unclear then the resident is contacted for clarification. At both Stage 1 and Stage 2 Actioning Officers contact the resident to discuss their complaint, ask for further information, explain HCC's policies, and understand what outcome the resident is seeking.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	All resident in complaints (Stage 1 and Stage 2) are sent a letter which details HCC's understanding of their complaint and what outcome they are seeking. If detailed are unclear then the resident is contacted for clarification. At both Stage 1 and Stage 2 Actioning Officers contact the resident to discuss their complaint, ask for further information, explain

HCC's policies, and understand what outcome the resident is seekina. Complaints are investigated by an officer in a supervisory position to the officer 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. The complaint handler (Actioning Officer) is expected to investigate a complaint impartially, 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). This includes guidance on investigations, investigation plans, interviews, letter writing, communication methods. N&H Toolkit for Complaint Handling.d Good practice from the Housing

Ombudsman and Local
Government Ombudsman is
circulated to the Customer
Feedback Manager deliver
actioning Officers and
training/briefings.

All officers in the Corporate

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 other areas of
HCC and do not have any conflict
of interests. The HCC Values and
Behaviours promote an ethical
and professional approach to all
aspects of an employee's role and
adhering to these will ensure any
conflicts of interest are identified
and action taken to ensure they do
not affect decision making.

All employees are encouraged to take the online training course

'Corporate Feedback and Complaints Awareness'. A N&H Complaint Handling Toolkit has been circulated to all complaint handlers. Briefings have been given by the CFM to officers on best practice in investigating and managing complaints. The External Relations Team have also developed and delivered internal training on housing repairs complaints through a number of bitesize sessions. The Customer Feedback Manager and External Relations Manager have access to all levels of management within N&H and frequently consults 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. If a staff member is complained about, they are asked their

				understanding of events and circumstances as part of the investigation. The resident is spoken to, and the Actioning Officer records their account and understanding of what has happened. 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, an independent Designated 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.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	Residents are updated on the progress of a complaint investigation. Updates are provided at intervals of 10 days.

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	Customer feedback and complaints Hull What happens to my feedback Hull CCF595358406	HCC Corporate Customer Feedback Process is available from the HCC website. 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/
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	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	The complaints process details a resident 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.

	A full record must be kent of the		Pagarda of all correspondence are	HCC do consider requests for escalation that are outside the 28-day timescale. This may be due to the resident 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. HCC will not normally consider a complaint if the action being complained about occurred more than 12 months ago.
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	Records of all correspondence are kept on HCC computer records (W:\Customer records) and on the HCC complaint recording system; GovService.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	Attempts are made to resolve all service requests and complaints at the earliest opportunity without compromising the quality or proportionality of the investigation and resolution. 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.
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	HCC has Vexatious and Persistent Complaints and Complainers guidance. The HCC Corporate Feedback Team determines if conduct/behaviour breaches the Vexatious and Persistent guidance. They maintain a record of all cases considered and action taken. N&H use a Health & Safety Warnings and Person Information Alerts Procedure. The purpose is to enable the N&H team to provide a personalised service based on individual circumstances balanced against the needs or risk that a Person or household members may pose to employees and	The Health & Safety Warnings and Person Information Alerts Procedure ensures HCC complies with The Health and Safety at Work etc Act 1974 and The Management of Health and Safety at Work Regulations 1999.

			contractors. All decisions are made by the appropriate manager and any markers recorded on the data system. Markers are reviewed on a 6 monthly or annual basis (depending on the level of marker) and whenever an incident occurs. Residents are notified by letter when a marker is added or removed.	
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	The HCC Corporate Feedback Team determines if conduct/behaviour breaches the Vexatious and Persistent guidance. They maintain a record of all cases considered and action taken. N&H use a Health & Safety Warnings and Person Information Alerts Procedure. The purpose is to enable the N&H team to provide a personalised service based on individual circumstances balanced against the needs or risk that a Person or household members may pose to employees and contractors. All decisions are made by the appropriate manager and any markers recorded on the data system. Markers are reviewed on a 6 monthly or annual basis (depending on the level of marker) and whenever an incident	All HCC policies are subject to an Equality and Human Rights Impact Analysis. The purpose of conducting 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 occurs. Residents are notified by letter when a marker is added or people's complaints. removed. The HCC Vexatious Complaints and Complainers Guidance states; • If a person is identified as being vulnerable, consider the use of an independent advocate to assist. • 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. The Council also has The Code of Conduct for Employees. The aim of this Code of Conduct is to promote consistency and to ensure that employees are aware of the standards of behaviour expected of them by Hull City Council. Its aim is also to protect employees against misunderstanding, criticism and falling victim to situations which are not always readily apparent. Employees are responsible for ensuring that they are aware of the Code and that they comply with its requirements and ask for

		clarification on any aspects of the Code where there is uncertainty.

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	Customer feedback and complaints Hull Complaints regarding your Council property Hull CCF519998597 CCF618774858 CCF617308820	When Actioning Officers receive a complainant they must ring the resident. This is to ensure they fully understand the complaint and what resolution is sought. If a complaint can be resolved at this point it is done so.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Granicus Management Report. N&H database	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.		Granicus Management Report. N&H database 2023/24 - 77% of Stage 1 complaints responded to within 10 working days.	HCC's feedback policy states complaints should be resolved within 10 working days.

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	Complaint extension letters explain why the extension is required and provide a timescale for when the resident will receive an update.
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 letters	The Housing Ombudsman's contact details are provided on every letter (including extension letters) sent to a resident.
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	Responses are sent once the investigation is complete and a determination made as to the result. A record is kept of any actions N&H 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. A secondary check is made with all residents via the CCFS survey. This provides them an opportunity to respond and inform the CFO if any actions remain outstanding, or they remain unhappy.	
6.7	Landlords must address all points raised in the complaint definition and provide clear	Yes	Complaint response letters	This is included in all Stage 1 responses.

	reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaint response letters	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.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This information is included in the complaint response letter template	This is included as all Stage 1 and Stage 2 responses are written on templates which include all the information required by the Code.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	All requests for a Stage 2 Review or expressions of dissatisfaction with the Stage 1 response are progressed to Stage 2 of the complaints process. HCC has a 2-stage complaint process.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Granicus Management Report. N&H database	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	All requests for a Stage 2 Review or expressions of dissatisfaction with the Stage 1 response are progressed to Stage 2 of the complaints process. The Customer Feedback Officer contacts the resident when clarification or further detail is required.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Customer feedback and complaints Hull What happens to my feedback Hull	This is always a different and more senior officer.

			Compleints regarding your Course!	
			Complaints regarding your Council	
			property Hull	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Granicus Management Report. N&H database 75% of Stage 2 Reviews (2023/23) answered within 20 working days	
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	Customer feedback and complaints Hull What happens to my feedback Hull Complaints regarding your Council property Hull	Stage 2 Review extension letters explain why the extension is required and provide a timescale for when the resident will receive an update.
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 response letters	The Housing Ombudsman's contact details are provided on every letter (including extension letters) sent to a complainant.
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	Responses are sent once the investigation is complete and a determination made as to the result. A record is kept of any actions N&H 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.	

			A secondary check is made with all residents via the CCFS survey. This provides them an opportunity to respond and inform the CFO if any actions remain outstanding, or they remain unhappy.	
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	Complaint response letters	This is included in all Stage 2 responses.
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	This information is included in the complaint response letter template	This is included as all Stage 1 and Stage 2 responses are written on templates which include all the information required by the Code.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 response letters.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Every complaint is finalised by a decision that is Upheld/Partially Upheld/Not Upheld. Where a mistake or poor service is identified this is acknowledged in the resolution letter with an apology and the action intended to put right the mistake/situation. The Customer Feedback Team records any action agreed to rectify a mistake/poor service. Follow up checks are made approximately 4 weeks later to ensure the actions have been carried out.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Proportionate remedies are offered where a complaint is Upheld or Partially Upheld. These can range from an apology, an agreement to conduct or complete repair work, and the payment of appropriate monetary compensation. Compensation Guidelines for managing N&H complaints have been agreed by SMT and circulated	

		to all officers who investigate complaints. These have been written having taken cognisance of the HO's Guidance on Remedies. Officers are aware that they cannot act outside of policies and promise residents outcomes they are not entitled to or cannot be delivered. Complaint response letters.	Remedy offers set out what
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.	Feedback Teams database recording agreed actions and completion.	will happen, and where possible provide dates for appointments to assess or conduct work. This is not always practicable. A record is kept of any actions/remedies N&H 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. A secondary check is made with all residents via the CCFS survey. This provides them an opportunity to respond and inform the CFO if any actions remain outstanding, or they remain unhappy.

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Compensation Guidelines for managing N&H complaints have been agreed by SMT and circulated to all Actioning Officers. These have been written with cognisance of the HOS Guidance on Remedies The Guidelines include statutory payments, quantifiable losses, time and trouble, distress and inconvenience caused.	These can range from an apology, an agreement to
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Section 8: Putting things right

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	Quarterly and Annual Customer Feedback Insight Reports. This Self-Assessment (and archived assessments from the last 4 years). Published on the HCC website. An annual report is produced and considered by the Audit Committee every Autumn. Complaints, performance and compliance Hull	The Customer Feedback Manager produces quarterly and an annual Customer Feedback Insight Reports. The annual report meets the requirements of a-f.
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.	Yes	The AD for N&H discusses the annual Customer Feedback Insight Report, the HOS Self-Assessment and its outcomes with the Portfolio Lead for Housing and Homelessness.	Whilst the HOS Self- Assessment is published on the HCC website the annual Customer Feedback Insight Report is not. This will be considered when the 2023/24

	The governing body's response to the report must be published alongside this.		The HCC Customer Feedback Team Leader submits an annual report to HCC Audit Committee in Autumn. This includes high-level data regarding the types of feedback received by HCC. Future reports will include the HO SA. Reports and minutes of meetings are published on our webpage at Complaints, performance and compliance Hull High level HCC feedback data is published on a monthly basis on the HCC website. Customer feedback reports Hull	report is presented to SMT.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger 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.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Not required to date.
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	Yes		Not required to date.

provide a timescale for returning to compliance with the Code.		

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	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. 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.	
9.2	A positive complaint handling culture is integral to the effectiveness with which		The Customer Feedback Team Leader attends at CST bi-monthly to	The annual STAR survey is conducted to assess
9.2	landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and		discuss complaint trends, intelligence and issues which have been identified across the whole Council, including in	residents' satisfaction with a wide range of N&H services. Results from the 2022/23

introduce positive changes in service	our role as Landlord. Senior leaders	survey relating to complaints
delivery.	then cascade this information through	are shown below.
,	their teams to improve service.	2022/23 indicated a fall in
	·	satisfaction compared to
		2021/22. However, the
		results placed HCC in the
		upper band of Large Urban
		LA's and ALMO's. This
		suggests the satisfaction
		rates for complaint handling
		are low across all large LA's
		and ALMO's, and despite a
		low percentage rate HCC
		compare favourably
		alongside its peers.
		TP01 TP02 TP03 TP04 TP05 TP06 TP07 TP08 TP09
		TP09: Satisfaction With Approach To Handl
		Fairly dissatisfied 33
		Very satisfied 36—
		Responses
		Neither satisfied nor dissatisfied 40
		Satisfaction by Age Range Satisfaction by I
		(missing) 66.67% 65.74 years 57.14% Boots
		75 years and
		45-54 years 33.33% Email 35-44 years 32.50%
		25-34 years 30.77% SMS
		0% 50% 0%
		The CFO sends a Customer
		The Of O serius a Gustoffler

Complaint Satisfaction Survey (Csat) to residents who have made a complaint. 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 Regulator for Social Housing (RSH) introduced a set of Tenant Satisfaction Measures (TSM) for all landlords in April 2023, as set out in the Governments Charter for Social Housing

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. They manage the officers/areas being

Residents - Social Housing White Paper. This includes TP09 – Satisfaction with the

landlord's approach to handling complaints.

			complained about and can ensure service delivery is not affected by a complaint. Learning and/or service improvements identified from complaints are disseminated by the Customer Feedback Team. This is through; • e mails and advice to specific managers and officers regarding specific complaints, • generic advice and guidance to affected areas within N&H or across all N&H officers managing complaints, • quarterly Customer Feedback Insight Reports.
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.	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	

	Landlords must appoint a suitably senior	complaints referred to them by residents or a Designated Person, and act as a critical friend. The HO Self-Assessment is also presented to the Panel for comments and suggestions. 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. The Autumn 2023 edition contained the Annual Report to Tenants 2022/23 (Pages 6-9). It referred to customer satisfaction rates with the approach to handling N&H complaints (Page 7). HHN autumn 2023 v1 P15 AW.pdf	
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	Full HCC feedback reports are presented monthly to HCC CST by the Council's Customer Feedback Team	

		, , , , , , , , , , , , , , , , , , ,
	potential systemic issues, serious risks, or	Leader. Abridged feedback data is
	policies and procedures that require	available on the HCC website.
	revision.	
		Customer feedback reports Hull
		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.
		The Area Director acts as the N&H
		lead for all feedback (including
		complaints). He ensures a Customer
		Feedback Insight Report is
		considered by SMT each quarter. The
		reports provide performance data and
	In addition to this a member of the	trends and identifies areas for
	governing body (or equivalent) must be	attention and/or improvement.
	appointed to have lead responsibility for	attention and/or improvement.
9.5	complaints to support a positive complaint	Cllr DAD is the HCC elected member
	handling culture. This person is referred to	with lead responsibility for complaints.
	as the Member Responsible for	with lead responsibility for complaints.
	Complaints ('the MRC').	The HCC Customer Foodback Team
	, ,	The HCC Customer Feedback Team
		Leader presents a monthly report to
		CST. This provides performance data
		regarding complaint handling and is
		broken down by directorate.

9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	See 9.5
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	The HCC Customer Feedback Team Leader presents a monthly report to CST. This provides high level performance data regarding complaint handling and is broken down by directorate. The Area Director acts as the N&H lead for all feedback (including complaints). He ensures a 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) and the action to comply with Ombudsman orders and recommendations. The report also includes reference to the HO annual performance report where it references HCC. The 4th quarter report also acts as an annual report, detailing annual data and trends.

		Recommendations are made in the quarterly reports and, where agreed by SMT, tracked via future reports. It also The annual self-assessment is reported on and considered by SMT. The MRC has access to performance dashboards which provide 'live time' performance reporting about Complaints.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	N&H's approach to complaint handling sits within the overall N&H Business Plan 2021-26. The business plan contributes to the Council's corporate plan and the Community Plan. N&H vision is; Building great places together, putting residents first. Culture & values HCC has corporate values and behaviours. • 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.

Behaviours

Curious, Integrity, Approachable, Courageous, Honest, Thankful, Positive, Caring, Ambitious, Inclusive, Listening, Innovative, Collaborative, Responsible, Reliable

In addition to the corporate values and behaviours, N&H have identified additional values / behaviours which are also important. They are:

- 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.

The Council also has The Code of Conduct for Employees. The aim of this Code of Conduct is to promote consistency and to ensure that employees are aware of the standards of behaviour expected of them by Hull City Council. Its aim is also to protect

employees against misunderstanding, criticism and falling victim to situations which are not always readily apparent.

Employees are responsible for ensuring that they are aware of the Code and that they comply with its requirements and ask for clarification on any aspects of the Code where there is uncertainty.

The above fits with the CIH Professional Standards 2021: integrity; inclusive; ethical; knowledgeable; skilled; advocate; leadership.

N&H complaint handling follows the full HCC approach to feedback and complaints.

<u>Customer feedback and complaints |</u> Hull

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 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 the CFO or CFM perform this role.	