

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: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Page 3 of the Council's Customer Feedback and Complaints Policy : <i>The council defines a complaint as '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>	The council has corporate wide customer feedback and complaints policy that covers all council services, including the housing landlord service.
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	The council's Customer Feedback and Complaints policy does not state that a resident has to use the word 'complaint' for it to be treated as such. We do set out on page 4 of our current policy - ' Complaints, compliments and comments can be raised by users of our services, carers and/or others acting on behalf of a current or potential user of any of the services normally provided by the Council '.	The council has corporate wide customer feedback and complaints policy that covers all council services, including the housing landlord service.

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	<p>Page 3 of the Council's Customer Feedback and Complaints Policy states:</p> <p><i>'The council defines a complaint as '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></p> <p><i>A complaint is not a request for service or an enquiry about a service.</i></p> <p><i>A request for service may become a complaint if the Council fails to meet our service standards after receiving the initial enquiry'</i></p>	The council has corporate wide customer feedback and complaints policy that covers all council services, including the housing landlord service.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<p>Customer Feedback and Complaints Policy – Page 5: <i>If the issue raised at the initial service resolution stage is serious, demonstrates that the Council has failed to meet service standards and is likely to warrant detailed investigation and response to the customer, then it will be escalated as a formal complaint</i></p>	See comment under 1.3 above
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though	Yes	We send surveys out as part of the conclusion of housing landlord service complaints	Any feedback obtained in survey responses is not counted as a complaint. Our

	<p>wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>			<p>TSM survey is anonymous so we are unable to directly feed back to the person completing the survey. In future TSM surveys, we will include wording advising people how to make a complaint if they wish to. This information has already been provided to tenants in our April 2024 tenant bulletin (see page 2).</p>
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Pages 7 and 8 of the Council's Customer Feedback and Complaints Policy clearly sets out issues that cannot be considered under the policy.	We would only refuse a complaint on the grounds if it was a duplicate and had already been responded to under the complaints process previously.
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	Yes	Pages 7 and 8 of the Council's Customer Feedback and Complaints Policy:	

	<p>must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		<p><i>The following issues cannot be considered under this policy:</i></p> <ul style="list-style-type: none"> • <i>Complaints against the Electoral Registration Officer or Returning Officer</i> • <i>Complaints relating to Electoral registration</i> • <i>Complaints against Councillors</i> • <i>• Complaints which should instead follow a statutory appeal or tribunal process such as complaints regarding a planning decision or a parking penalty charge notice</i> • <i>Complaints against issues or service which are outside of our control or where the actions are by a third party over whom the Council has no control</i> • <i>Matters relating to Insurance claims or legal proceedings</i> • <i>The complaint has not been raised within 12 months of the date on which the issue or matter occurred, unless there has been a compelling and justifiable case</i> • <i>• The complaint has been considered already</i> • <i>The complaint is being pursued in an unreasonable manner</i> • <i>Appeals or disputes regarding decisions made under other FHDC policies, procedures or processes</i> 	
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			<ul style="list-style-type: none"> Complaints about contractors, where they have not had the opportunity to address the complaint in the first instance (if you are unhappy with the complaint response you have received from contractors then you can complain to us directly) <p>These types of complaints fall outside of the council's complaints procedure because:</p> <ul style="list-style-type: none"> There are other processes more suitable for dealing with them such as statutory appeal or tribunal process They are outside of our control There are separate legal or regulatory requirements covering these services The council does not wish to prejudice any legal proceedings 	
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	<p>Page 7 of the Council's Customer Feedback and Complaints Policy states, the following for not accepting a complaint:</p> <p><i>The complaint has not been raised within 12 months of the date on which the issue or matter occurred, unless there has been a compelling and justifiable case</i></p>	See comment under 2.1 above. Yes sometimes people say they wish to escalate but have come out of hospital or had a personal issue and I advise they can complain whenever they are ready.

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	Our customer feedback and complaints policy does set out the reasons why we would not consider under the complaints process (see page 5). In those circumstances we would refer these issues to relevant department, for example legal department or Insurance.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		Each complaint case is treated on its individual merit and not on a blanket approach.

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	Page 3 of the Council's Customer Feedback and Complaints Policy: <i>The Council has a duty to ensure everyone has the right to be treated fairly when using our services. A complaint can also be made on the grounds that a Council service or policy has discriminated against those with protected characteristics as defined in the Equality Act 2010</i>	Our January 2025 tenant newsletter will include an article around what is and what is not treated as a complaint, and details of the different channels residents can use to make a complaint.

			<p><i>For a complaint to be treated under this policy, it will need to be made in one of the following ways:</i></p> <ul style="list-style-type: none"> • <i>Our online feedback form • Email complaints@folkestone-hythe.gov.uk</i> • <i>Telephone: 01303 853000</i> • <i>In writing: Folkestone & Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent CT20 2QY</i> • <i>Through a representative (in writing or by email)</i> 	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Customer Feedback and Complaints Policy – Page 3 (see above)</p>	<p>Residents can make a complaint by online form, by email, in writing, by phone or in person. All staff are aware that complaints must be directed to complaints@folkestone-hythe.gov.uk to ensure they are logged and processed correctly.</p> <p>When customer feedback and complaints policy is reviewed, we will refresh awareness with staff on the policy.</p>
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Housing complaints and learning are reported to Housing Landlords – Strategic Tenants Advisory Panel on a quarterly basis throughout the financial year.</p> <p>The annual complaints and service improvement showing volumes for the previous financial year is published on the council website*</p>	<p>*The 2023/24 Annual Complaint and Service Improvement Report is due to be published on the council website by end of October 2024.</p>

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	<p>The council's customer feedback and complaints policy is published on the council's website here: Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)</p> <p>The complaints webpage – Sets out the two stage process of dealing with complaints here: Council's complaints procedure Folkestone & Hythe District Council (folkestone-hythe.gov.uk)</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No		This will need to be worked into the review of the Council's Customer Feedback and Corporate Complaints Policy
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<p>See comment under 3.5 above. Customer Feedback and Complaints policy does currently state the following on page 4:</p> <p><i>We will accept complaints from representatives of individual customers, such as family members, carers and advocates and operate within the Data Protection Regulations. We will consider each case on its own merit but our general approach is to work with representatives where we have: Express written authority from the customer to deal with their representative about the specific issue or complaint</i></p>	

			<p><i>Express oral permission from the customer to deal with their representative</i></p> <p><i>There is strong evidence that the customer is not able to complain unaided or cannot give consent and therefore it is in the customer's best interest for the Council to liaise with the representative.</i></p>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Customer Feedback and Complaints Policy on Page 7 sets out that following the council's two stage complaint process, if a resident is unhappy they can contact either Local Government or Housing Ombudsman.	All responses to Stage 2 complaints advise residents that if they are unhappy with the Stage 2 response, they can refer their complaint to the Ombudsman and contact details for the Ombudsman are included in the response.

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	The council has a dedicated Housing and Corporate Complaints officer that resides within the Governance, Performance and Risk Team.	
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	The Housing and Corporate Complaints officer has access to staff at all levels to ensure prompt resolution of complaints. A dedicated contact list of staff is in place ensure complaints are escalated to the correct person for investigation.	
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	We almost always respond to 100% of complaints within our target response times, as shown in our TSM data for 2023/24 . Details on complaints responses and learning outcomes are	All Stage 1 complaints are dealt with by our Housing & Corporate Complaints Officer who is fully trained. Stage 2 complaints are dealt with by the relevant manager in

			reporting to a STAP and our Corporate Governance Board.	the housing team, all of whom are trained.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Customer feedback and complaints policy is published on our website here: Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	The council has corporate wide customer feedback and complaints policy that covers all council services, including the housing landlord service.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	The council's Customer Feedback and Complaints Policy on pages 5 and 6 sets out Stage 1 and 2 process for complaints. The policy does set out an initial service resolution to ensure we can resolve complaints on the spot before a formal process.	As defined in our policy, we only have Stage 1 and Stage 2 complaints.
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	The council's Customer Feedback and Complaints Policy on pages 5 and 6 sets out Stage 1 and 2 process for complaints. This is also publicised on our website here: Council's complaints procedure 	

			Folkestone & Hythe District Council (folkestone-hythe.gov.uk)	
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.	No	At present, all complaints about contractors must be dealt with by them in the first instance under their complaints process. If a resident is not happy with the response, they can then come to the council for a stage 1 complaint and stage 2 if still not happy	This will need to be included in the overall review of Customer Feedback and Complaints Policy before end of 2024/25 financial year.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	No	See above.	This will need to be included in the overall review of Customer Feedback and Complaints Policy before end of 2024/25 financial year.
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	Our complaint responses by letter or email always start by setting out what our understanding of the resident's complaint is.	
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	Yes	If elements of a complaint do not fall within our remit, this is clearly communicated to the resident	

	clarify any areas where this is not clear.		along with what has been investigated The Customer Feedback and Corporate Complaint policy on pages 7 and 8 also clearly sets out what complaints cannot be dealt with under the policy.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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	The council had a housing and corporate complaints officer that resides in the Governance, Performance and Risk team. The officer is independent from any operational functions of the Housing Landlord Service allowing them to act independently and consider all information carefully.	
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	We have an established response template that is used.	If a complaint is not going to be answered on time an e-mail is sent to them advising them of the reason why and a new expected response date.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of	Yes	Reasonable adjustments are made where appropriate under the Equality Act 2010 when	2023-24 Annual Equality and Diversity Report with complaints breakdown to be published in early 2025.

	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.		<p>dealing with resident complaints. Salesforce system for logging complaints has a dedicated 'Equality and Diversity' category to help identify complaints associated to this. All adjustments and lessons learnt from complaints are recorded where applicable in the system.</p> <p>A record of equality and diversity related complaints is reported in the annual Equality and Diversity Report.</p>	
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	The stage 1 response says the complainant can escalate and advises them to say what was wrong with the stage 1 response specifically so we can address it in the stage 2 response	Wording in customer feedback and complaints policy needs to be amended as part of the wider review due before end of 2024/25 year to ask the reasons why.
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	<p>All evidence is stored on a platform called Salesforce including reports and previous correspondence that has helped formulate a response</p> <p>Reports are run on a monthly basis on the subject and response times for stage 1, stage 2 and Ombudsman</p>	

			complaints to support the council's performance reporting.	
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	Our customer feedback and complaints policy on page 6 sets out a section explaining what the council will do when it gets things wrong. This applies to both stages of the complaints process.	
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	We council corporate for policy for with unreasonable complaints: Dealing Unreasonable Complaints Policy (folkestone-hythe.gov.uk) - The policy clearly sets out examples of what is considered unreasonable complaints, when the policy will be applied, lifting of restrictions and right of review.	Our Unreasonable Complaints Policy sets out our approach to dealing with unreasonably persistent complainants and unreasonably persistent behaviour.
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	Dealing Unreasonable Complaints Policy (folkestone-hythe.gov.uk) - Policy sets out options for council to use if behaviour of complainant is deemed unreasonable. All assessed decisions of limiting contact are clearly set out per section 9 of policy.	Any decisions to impose restrictions are made on a case-by-case basis and with due regard to Equality & Diversity.

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 Policy ensures that we acknowledge all housing landlord complaints within 5 working days and respond within 10 working days. Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Customer Feedback and Complaints Policy on Page 5. Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Customer Feedback and Complaints Policy on Page 5. Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>When we send a request for the extension a date, we set out the reasons why and the new date of response. The new date set by Housing and Corporate Complaints Officer for a response does not exceed the 10 day limit without exception.</p> <p>Any records of extensions are logged on the case file on Salesforce system.</p>	<p>This will be added into extension template to make this clear as part of the wider review of the policy due before end of 2024/25 year.</p>
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.	No	<p>The ombudsman will not investigate complaints until residents have been through our complaint's procedure.</p>	<p>We need to include this in our extension template for responses to a complainant.</p>
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	<p>We respond to complaints with 10 working days and explain any outstanding work due to be completed.</p> <p>This tracked by our Housing and Corporate Complaints officer in relation to housing repairs complaints with contractors and this tracked through to completion by the officer.</p>	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	<p>The Complaint letter templates set out the following:</p> <p>Upheld complaints:</p>	

	<p>policy, law and good practice where appropriate.</p>		<ul style="list-style-type: none"> • Subject of complaint <p><i>Points investigated as part of complaint</i></p> <ul style="list-style-type: none"> • <i>What will happen next</i> • <i>Chronological summary of complaint in short points</i> • <i>Response to all the points detailed in the complaint</i> • <i>What we are doing to avoid this happening again</i> • <i>What happens now</i> <p>Not upheld complaints:</p> <ul style="list-style-type: none"> • <i>Subject of complaint Points investigated</i> • <i>Chronological summary of complaint in short points</i> • <i>Response to all the points detailed in the complaint</i> <p>Any references to appropriate legislation will be used in upheld and not upheld complaints cases to support the decision made to a resident.</p> <p>Example is stage 1 dibble 42 bridge street, succession</p>	
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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	Additional complaints during an investigation are considered if they are related otherwise a separate stage 1 complaint is raised	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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	Our Stage 1 complaint response template ensures that all of these points are addressed.	

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 Policy on Page 5: Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	
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	The Council uses the Salesforce platform for the logging of all complaints. The Customer Feedback and Complaints policy sets out Stage 2 procedure on page 5: Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	
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.	No	See comments in next column	Our Complaints Policy currently states: You will need to tell us specifically where you believe we let you down in our Stage 1 investigation before we can consider your complaint at Stage 2. This will need to be amended in our current Customer Feedback and Complaints Policy .

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	See Customer Feedback and Complaints Policy – Page 6: Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)	Our Complaints Policy states: At Stage 2 the investigating officer is generally the senior officer of the service area to which the complaint relates.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Customer Feedback and Complaints Policy on Page 6	
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	We would extend a complaint if a surveyor or neighbourhood officer is on leave or off sick to clarify conversations that have been had with the resident that are required to process the complaint. The resident would be informed of the date the officer is returning to work and the expected date the complaint response will be provided.	
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.	No	See comments in next column	The ombudsman details will need to be included in the extension response template sent out to resident.
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	Yes	The response provided would include dates for further works to take place surrounding outstanding actions, for example in relation to housing repairs complaints.	

	actioned promptly with appropriate updates provided to the resident.			
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	Folkestone and Hythe Complaint Letter templates for Stage 1 and Stage 2.	
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	Folkestone and Hythe Stage 2 Complaint response template	Our Stage 2 complaint response template ensures that all of these points are addressed.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	yes	A stage 2 response as per Customer Feedback and complaints policy will be investigated by senior officer of the service area to which the complaint relates. The Housing and Corporate Complaints Officer liaises with all relevant	

			departmental contacts a complaint is related to that ensures a response is issued within timeframe set.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • 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	<p>Customer Feedback and Complaints Policy – See page 6 Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)</p> <p>Our complaint response templates ensure that all of these points are addressed.</p> <p>Recording of lessons learnt from upheld and partially upheld complaints on Salesforce System</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		Our Housing Compensation Policy sets out our approach to financial remedies. Other	See 7.1 above.

			remedies offered are considered on a case-by-case basis when investigating each complaint, and communicated to tenants in our response to their complaint.	
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.		See 7.2 above.	See 7.1 above.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our Housing Compensation Policy categorises compensation in the form of mandatory, quantifiable loss or discretionary payments, in line with the Ombudsman's guidance.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>The council produces a corporate wide annual complaints and service improvement report that includes complaints from received by Housing Landlord Service as well as learning from any complaints upheld.</p>	<p>We will need to provide more detail about housing-specific service improvements made as a result of complaints learning as part of future reporting.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No		<p>Report is due to be presented to Governing Body and Member responsible for complaints before end of October 2024 and will then be published with governing body response alongside.</p> <p>The Governing body will be amended as per the changes to the council's governance structure due to be implemented in May 2025.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	See comment in next column	This has not happened so far, but if it were to arise, we would complete a new self-assessment setting out timescales for completion
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	See comment in next column	See 8.3 above.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		See 8.3 above.

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	Lesson learning log updated by Housing and Corporate Complaints Officer	We have introduced a lessons learned log which allows us to identify service improvements we can make as a result of complaints.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Our Strategic Tenant Advisory Panel receive regular reports on learning from complaints based on information from the learning log.	See 9.1 above.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Our Strategic Tenant Advisory Panel receive regular reports on learning from complaints. Our May 2023 tenant bulletin also included an article with details of changes we had made based on learning from complaints.	Complaints and learning reports go quarterly to our Strategic Tenant and Advisory Panel to scrutinise.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues,	Yes	Senior Performance Officer have overall accountability for complaints and analyse complaints received to identify trends and learning outcomes.	

	serious risks, or policies and procedures that require revision.			
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Member Responsible for Complaints (MRC) has been identified as Cllr Gary Fuller – Cabinet Member for Resident engagement and accountability.	The Member Responsible for Complaints (MRC) has been identified as Cllr Gary Fuller – Cabinet Member for Resident engagement and accountability.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	We provide performance stats on response times, number of complaints received for housing as part of performance indicators to MRC as part of their monthly portfolio meetings.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with 	Yes	We provide performance stats on response times, number of complaints received for housing as part of performance indicators to MRC as part of their monthly portfolio meetings.	

	orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
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 co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	<p>The council's Customer Feedback and Complaints Policy is designed to ensure that we are accountable, apologise when we get things wrong and work towards learning to improve our processes.</p> <p>The Housing and Corporate Complaints officer works with members across all departments in the escalation and processing of complaints to ensure they are investigated and residents are provided with an outcome.</p> <p>We keep log of the lessons of complaints where we have got things wrong and our Customer Feedback and Complaints policy has a section setting out what we will do 'when we get things wrong? On page 6 of the policy. Customer Feedback and Complaints Policy (folkestone-hythe.gov.uk)</p>	Our Customer Feedback and Complaints Policy will be widely reviewed before end of 2024/25 year to ensure any areas non compliance in this self-assessment will be addressed.

			We act within professional standards for engaging with complaints set by any relevant professional body, by providing information required to assist complaints within timescales set.	
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