

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	Corporate Feedback Policy (CFP) sections 5 and 6.	CFP defines a complaint as “any expression of dissatisfaction requiring a response.” Note: The current CFP was adopted by the council’s Corporate Leadership Team (CLT) on 7 May 2024 following an extensive review.
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	CFP section 5.	
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	CFP sections 5 and 8.	Current policy has expanded to include Service Requests in Section 5. This gives further clarity to the definition and treatment of a ‘service request’.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	CFP	Our practice is to pursue both the service request and the complaint at the same time. We have amended our CFP policy to make this clearer.
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	CFP section 6.2.	This was missing from our CFP which has been updated to include this.

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	CFP section 6.	ESC evaluates all customer feedback, and all feedback is accepted. Feedback includes complaints, compliments, and comments. Section 6 of our CFP outlines circumstances where we will not treat feedback as a complaint and why. This is explained to the customer.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	CFP section 6.	Outlines circumstances where we will not treat feedback as a complaint and why. This is explained to the customer.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	CFP section 6.4.	Our practice is that the Housing Operational Lead will review out-of-time complaints and decide whether to accept them.
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	CFP section 6.4 CFP section 10.1	The CFP outlines circumstances where we will not treat feedback as a complaint and why. This is explained to the customer. The customer is also advised of their right to take this decision to the Ombudsman and how they can do this in the policy and in stage 1 and stage 2 investigation outcome letters.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	CFP section 6.2	

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	ESC Equality and Diversity Policy . CFP section 2. CFP section 7.	East Suffolk Housing has adopted the ESC Equality and Diversity Policy which lays out how we promote equality. We are also starting a piece of work to understand what is required to anticipate tenants' needs for engagement and communication, including complaints. We will consult with tenants on our new Engagement Strategy over the summer of 2024.
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	CFP section 2. CFP section 7.	New starters in the organisation will be briefed on the council's feedback policy and procedure. In addition, we are updating our induction process to make explicit reference to the regime. Our Customer Relations team deliver regular training and updates to the wider organisation on complaint investigation and response. This is particularly given changes to the ombudsman's joint code.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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>The Council's Customer Relations team do challenge the perception that high volume in itself is inherently negative, without losing sight of how they can also indicate genuine, endemic service failure.</p> <p>We are planning work to reinforce the positive opportunities for learning and improvement that derive from feedback.</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	ESC website customer feedback section	<p>Our approach to feedback and our supporting policy are published on our website. The policy document is an accessible portable document format (PDF) file.</p> <p>The CFP will be provided in a different format if required. In some cases, some requests might be difficult to satisfy, and will be considered on an individual basis.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	ESC website customer feedback section	<p>The council has a Customer Feedback page on the public website which includes comments, compliments, and complaints. This includes a link to the CFP and to the Housing Ombudsman website.</p> <p>We are exploring the need for additional publication methods and channels for our policy and guidance.</p>
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	CFP section 7.1.	
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	CFP section 10.1.	This information is provided on the ESC public website. It is also provided at the conclusion of each stage of our complaints process.

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	Evidence item 4.01	ESC has a Customer Relations Team (7.0 FTE) of which 3 people (2.0 FTE) are dedicated to complaint handling and Ombudsman liaison. This team sits within the service area for Digital, Programme Management and Customer Services.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Head of Service/Customer Experience Development Manager cover the Complaints Officer role and have all appropriate access and oversight.	Each Head of Service is accountable for the performance of their service area and for overseeing all complaints and service requests. The Customer Experience Development Manager is the Complaints Officer for East Suffolk Council. Heads of Service are responsible for ensuring the Customer Experience team have unrestricted access to staff at all levels to facilitate the prompt resolution of complaints.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	No		<p>ESC, as a Local Authority have a dedicated Customer Relations team who are all fully trained in complaint handling.</p> <p>Over recent years we have made improvements to how we use complaints as learning opportunities but more work is required and this will be incorporated into our improvement plans going forward.</p> <p>Housing works closely with Customer Relations to ensure fairness and consistency in all complaint responses.</p>

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	CFP section 7.	Policy states that customers will not be treated differently if they complain.
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	CFP section 8.2.	Policy and practice emphasise the importance of early resolution. We have no extra named stages in our complaints process.
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		We have a two-stage process for complaints handling, Stage 1, and Stage 2.
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	CFP section 6.3.	Section 6.3 of our CFP states that contractors must forward any complaints received to the ESC Customer Relations team. We are reviewing our procedures for ensuring contractors report any complaints to the ESC Customer Relations team.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Not applicable.	We do not have any contractors who handle complaints on behalf of ESC.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No	CFP section 8.3.	<p>When a complaint is logged, an automated acknowledgement is issued to the complainant. While this only provides a case reference and timescales for response, our May 2024 feedback policy explicitly requires the investigating officer to make contact with the complainant to clarify mutual understanding of the complaint. This may include written correspondence, usually via email.</p> <p>We need to explore how we could put our complaint definition in writing to the complainant at an earlier point in the process; this is likely to involve changes to our existing process and tools.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No		<p>The assessment of the complaint is undertaken by the Investigating Officer after acknowledgement. When the Investigating Officer phones the customer, they will explain what the landlord is, and is not, responsible for.</p> <p>As ESC is a council, our Customer Relations team are not experts in all aspects of housing and housing complaints. For this reason, we prioritise sending the complaint to the Investigating Officer in Housing for a conversation with the customer and a full assessment.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol 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	CFP section 8.3.	<p>We have written our CFP carefully to make these intentions clear to every person working in the Council.</p> <p>In the main, it is the responsibility of the Investigating Officer (in Housing) to make sure these intentions are delivered.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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		If a complaints response is going to take longer than 10 days, ESC advises the customer how long this will be extended by (up to 10 days) and provides Ombudsman details.
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.	No		<p>East Suffolk Housing has adopted the ESC Equality and Diversity Policy which lays out how we promote equality.</p> <p>Housing is reviewing its approach to equality data and how this is recorded and used.</p> <p>We are starting a piece of work to understand what is required to anticipate tenants' needs for engagement and communication, including complaints. We will consult with tenants on our new Engagement Strategy over the summer of 2024</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	CFP section 8.4.	Policy outlines the instances in which ESC would refuse to escalate a complaint to Stage 2. This is only where the council believes there is sufficient justification for refusal. An example would be where a complaint is not upheld on the grounds of ESC policy, and we would refer the customer directly to the Ombudsman without escalating to Stage 2.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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		We achieve this through ESC's customer feedback software package called "Contact Us". All supporting documents are attached and all stages of a complaint, including responses, are recorded. The Investigating Officer adds notes following every contact with the customer.
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 priority is to remedy a complaint as fast as possible, therefore, the complaint may be remedied at any point in the process. This is relayed in Section 9.1 of our CFP.
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	ESC Unreasonable Behaviour Policy .	East Suffolk Housing will adopt the new ESC Reasonable Behaviour Policy, which will be found on the East Suffolk website. The Head of Customer Services and the Head of Environment are reviewing and updating this policy. This is work in progress. We are waiting for confirmation of the timescales for this work.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	ESC Unreasonable Behaviour Policy .	<p>East Suffolk Housing will adopt the new ESC Reasonable Behaviour Policy, which will be found on the East Suffolk website.</p> <p>The Head of Customer Services and the Head of Environment are reviewing and updating this policy. This is work in progress. We are waiting for confirmation of the timescales for this work.</p>

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	CFP section 8.3.1. Evidence item 6.01 A and B	This is the responsibility of the Investigating Officer (in the Housing Service). They will evaluate the complaint and determine the course of action required. They will assess the vulnerability of the tenant and the urgency of the resolution. They will seek early resolution where possible. They will identify learnings and implement improvement actions.
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	Covered in Section 8.3 of our CFP	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Covered in Section 8.3 of our CFP.	The ESC Customer Relations team monitor progress of all complaints into the Council and support Officers to achieve the required timescales.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Covered in Section 8.3 of our CFP	
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	Covered in Section 8.3.2 of our CFP	
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	Covered in Section 8.3.2 of our CFP	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Covered in Section 8.3.2 of our CFP	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Covered in Section 8.3.2 of our CFP	
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	CFP section 8.3.2 Evidence item 6.09	The ESC Customer Relations team compile the response using the information provided by the Investigating Officer. This team assures the quality of the response and adherence to 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	Covered in Section 8.3 of our CFP.	Our response at the end of Stage 1 advises the tenant how to escalate to Stage 2 if they wish
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	Covered in Section 8.3 of our CFP.	
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	Covered in Section 8.3 of our CFP.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Covered in Section 8.3 of our CFP.	Stage 2 reviews are overseen by the Head of the Housing Service. They will either take over as Reviewing Officer or assign to a senior member of the service not associated with the Stage 1 complaint.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Covered in Section 8.3 of our CFP.	The ESC Customer Relation team monitor progress of all complaints into the Council and support Officers to achieve the required timescales.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Covered in Section 8.3 of our CFP.	A Stage 2 complaint is a re-investigation of the entire complaint. This is a change. Previously our Stage 2 reviewed the Stage 1 process but this has been changed in response to the new Code.
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	Covered in Section 8.3 of our CFP.	
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	Covered in Section 8.3 of our CFP.	
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	Covered in Section 8.3 of our CFP.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	CFP section 8.3. Evidence item 6.19	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Covered in Section 8.3 of our CFP.	The Policy shows how a specific complaint should be escalated within the Council. For example a complaint about a Director will be escalated to the Chief Executive as the Reviewing Officer.

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>CFP section 9.</p> <p>Evidence item 7.01-7.04 A, B, and C</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Evidence item 7.02 draft policy	Described in our Compensation Policy for Housing. A draft policy is being reviewed prior to adoption.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p>CFP section 9.</p> <p>Evidence item 7.01-7.04 A, B, and C</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	CFP section 9. Evidence item 7.01-7.04 A, B, and C	A link to the Ombudsman's guidance is provided in our Feedback Policy

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. 	No		<p>Learnings are captured from individual complaints and action taken by Housing Strategic and Operational Leads to implement improvements. These are escalated to the Housing Leadership Team where a change to Policy is required and/or a coordinated improvement across multiple operational teams.</p> <p>Improvement projects and actions are included in the annual Housing Service Plan.</p> <p>In ESC there is no formal business process for an aggregated review of complaints performance. Work has started to move towards this. We have amended our procedures and computer system so we now capture the data we need for an ESC review of complaints performance.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	ESC has a dedicated page on its website to provide information on our policy and the Feedback procedure.	<p>For the purposes of its role as a registered provider, ESC designates its Corporate Leadership Team (CLT) as its governing body. As a local authority with a much broader remit than other RPs, CLT can fulfil this role.</p> <p>In addition to this, the two elected Councillors who have been appointed Cabinet Members with responsibility for Housing and Customer Services have also been consulted, to ensure governance at an Elected Member level as well.</p> <p>The ESC self-assessment and the response from CLT and Elected Members will be added to the ESC website week commencing 1st July.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Covered in Section 11 of our CFP	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Covered in Section 11 of our CFP	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	ESC records Business Continuity Plans for each Service area and team. These are stored on Resilience Direct to ease access in an exceptional circumstance.	Currently, these Plans do not explicitly reference the HO Code. An action has been raised to update the BCP for Customer Services and Housing to add this part of 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.	No	Our CFP has been updated to strengthen this point.	Reporting is being improved to focus more on learning and outcomes, to accompany additional resource in our Customer Relations team to track and support teams' delivery against registered actions.
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.	No	We are not fully confident a positive complaint handling culture is embedded in the organisation; this will be incorporated into our improvement plans going forward.	ESC Housing is building a new capability for tenant engagement. This capability and work programme will be used to drive cultural change through the Housing Service. An early piece of work is the reinstatement of community walkabout days when Housing Officers will engage with Tenants to listen, and to consult on a range of identified issues. The first walkabouts will take place in June 2024.
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.	No	–	ESC Housing is building a new capability for tenant engagement. This capability and work programme will drive cultural change, including attitudes and behaviour around complaints. Transparency and accountability will be principles of our TE approach.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		<p>The Head of Customer Services is accountable for the ESC Customer Feedback Policy, and the performance of the Customer Relations team. They work with the Heads of all the council service areas to assess trends, risks and systemic issues.</p> <p>The Head of Housing (HoH) is accountable for complaint handling within the Housing Service</p> <p>The Housing Monitoring Officer collates reports of complaints for the HoH.</p> <p>Service Performance, including complaints, are reviewed by the Housing Leadership Team to identify system issues, risks or changes to policy or procedure. Housing Strategic Leads are responsible for implanting the changes required.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		<p>The MRC with lead responsibility for complaints is the Head of Digital and Customer Services.</p> <p>The Head of Housing is the MRC for complaints within the Housing Service.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No		<p>The Head of Digital and Customer Services is the lead officer with responsibility for this aspect of the code.</p> <p>They have the Customer Relations Team within their service, who lead on complaint handling for the Council.</p> <p>The Head of Housing is currently increasing the capability within housing to work more closely with the Customer Relations Team. At the time of this submission, there are 2 roles being advertised, which will pick up this work in more detail.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	No		<p>This is not a distinct piece of work regularly reported to the Governing Body (Corporate Leadership Team).</p> <p>This will be developed over the next few months, as new posts are filled and capacity to review trends in more detail increases.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> 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 ESC Corporate Leadership Team share this standard objective.</p> <p>The Head of Housing (HoH) is accountable for complaint handling within the Housing Service.</p> <p>Service Performance, including complaints, are reviewed by the Housing Leadership Team to identify system issues, risks or changes to policy or procedure. Housing Strategic Leads are responsible for implanting the changes required.</p>