

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	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>The policy includes the following wording to define a complaint:</p> <p>“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by our organisation, our staff, or those acting on our behalf, affecting an individual resident or group of residents.”</p> <p>Please also refer to the complaints policy</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	<p>Hammersmith and Fulham Council has a formal complaints policy which covers corporate complaints and complaints relating to Adult Social Care and Children’s Services. Please see link in evidence.</p> <p>The policy is reviewed every three years, or sooner if there is a relevant change. This was last reviewed in May 2024 to be in line with the new Housing Ombudsman Complaint Handling Code.</p>
1.3	<p>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.</p>	Yes	<p>Please refer to the complaints policy.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p> <p>Please refer to the complaints policy pages 13 & 16</p>	<p>Complaints are accepted as a formal complaint even if the word ‘complaint’ is not used. They can be made via all channels including verbally on a call, face to face, online, by email and in any written communication.</p> <p>A complaint submitted via a third party or representative</p>

				<p>will still be handled in line with our complaints policy.</p> <p>We aim to manage expectations from the outset being clear where the desired outcome is unreasonable or unrealistic.</p>
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>Please refer to the complaints policy page 11</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	A complaint could be identified by triaging a service request. An explanation of the difference between a service request and a complaint is included in our policy.
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>Commentary/explanation as evidence.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	Complaints can be raised while the service request is in progress and the service will continue to be progressed alongside the complaint process. All staff are aware of this and follow the process accordingly.
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	Yes	<p>Commentary/explanation as evidence.</p> <p>We are displaying the poster on noticeboards across the estates and have it on our online noticeboard on the Get Involved</p>	If a comment in a survey constituted a complaint, we would refer the resident to the complaints process or the relevant process.

	<p>their services, they also must provide details of how residents can complain.</p>		<p>Hub -Talk To Us – LBHF Get Involved The engagement team is also taking the opportunity to cascade this information at various resident community events they attend.</p>	<p>We publicise online on our website and through publications. We have a digital poster on the Get Involved page and these posters are also positioned on notice boards on the Hammersmith and Fulham Housing Estates. This gives details on how to log a repair request, make a complaint, how to contact the Ombudsman and details of the Complaint Handling Code.</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	Please refer to the complaints policy page 7 H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	Complaints are only refused by exception and for the reasons specified in the policy and each case will be considered on its merits. We will always provide a detailed explanation setting out the reasons why the matter is not suitable for our complaints process and the right to escalate to the Housing Ombudsman.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> • 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. 	Yes	Please refer to the complaints policy pages 10 and 11 H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	Our Complaints Policy details reasons that a complaint will not be considered. This includes where the complaint will follow a different process, for an example, an appeal to a planning application.

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			
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>Please refer to the complaints policy page 7</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	Our complaints policy explains circumstances where discretion may apply.
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	<p>Commentary/explanation as evidence. There are also clear guidelines within the complaints policy pages 11 and 12.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	Where a complaint is refused the response to the resident gives the reasons why and will give details of the route to take this to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Commentary/explanation as evidence	Each case is considered and determined on its own merits with clear reasons being sent to the resident about any decisions to exclude any aspects, clearly identified in the complaints policy. Also providing details of the route to 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	LBHF has a broad range of access channels available to make a complaint. This includes our 'Contact us' web page which allows customers to make a complaint in different ways. Contact us London Borough of Hammersmith & Fulham (lbhf.gov.uk)	Complaints are accepted as a formal complaint even if the word 'complaint' is not used. They can be made via all channels including verbally on a call, face to face, online, by email and in any written communication. This includes our 'Contact us' web page which allows customers to make a complaint in different ways. In compliance with the Equalities Act, we adapt our procedures and policies to meet resident's needs and put in place reasonable adjustments. We ask about specific needs/ requirements on our self-service request form. Contact centres that fill out this self-service request form over the phone on behalf of residents also capture these needs. The completion of this information then enables an alert to be generated on the system for officers viewing the

				<p>case. Home visits are arranged through our Tenancy Management Team where required. Safeguarding processes are followed as appropriate, and the Resident Experience Team liaise with relevant departments such as Adult Social Care and Children's Services. Staff delivering services and complaint handlers are reminded to check the relevant sections on the housing system to ensure services delivered consider any recorded vulnerabilities. In addition, consideration is given to the training needs of staff through complaint investigations and feedback.</p>
3.2	<p>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.</p>	Yes	<p>Commentary/explanation as evidence</p>	<p>All council staff are aware of the complaints policies available on the website and can signpost or assist residents in accessing this service at this time.</p> <p>Handling complaints effectively and ensuring we assist resident and customer is one of LBHF's priorities, this is highlighted at the Corporate</p>

				<p>Induction for all new staff members.</p> <p>All staff have access to the website and can signpost and offer an assisted service to residents and customers at any time. Through training and guidance in the Housing Service this ethos and way of working is championed to ensure all staff are aware and action appropriately.</p>
3.3	<p>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.</p>	Yes	<p>Commentary/explanation as evidence.</p> <p>Complaints and compliments London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	<p>The council's complaints policy and processes are published on our website and on our estate, notice boards, to ensure accessibility for all.</p>
3.4	<p>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.</p>	Yes	<p>Commentary/explanation as evidence.</p> <p>Complaints and compliments London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	<p>The policy is published on our website and can be made available in other formats if requested. The website itself can be translated into other languages and offers a read aloud facility which can be used while browsing the complaints web pages, but this does not apply to linked documents such as the policy.</p>

				Our website includes a page with information on accessibility and information on how residents can get support with accessibility of our website and our services. Accessibility statement LBHF
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	Please refer to the complaints policy Page 10. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	This information is available within the 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	Commentary/explanation as evidence. Please refer to the complaints policy Page 4. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	A complaint submitted via a third party or representative will still be handled in line with our complaints policy. Representatives can be invited to any meetings with the landlord regarding the complaint issues with the complaints consent.
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	Commentary/explanation as evidence. Please refer to the complaints policy Page 10. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	Information on the resident's right to contact the Ombudsman service is provided throughout the resident's complaint. Details are included in the acknowledgement to the complaint and in the templates for complaint responses. Officers are instructed to

				include this information in interim complaint correspondence, for example when contacting residents to advise on extended timescales.
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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	Commentary/explanation as evidence	The Council has a central team, the Resident Experience Team, this team coordinate, and report on complaint responses across the Council. All complaints come into this team and are allocated to the relevant departments for response. The Ombudsman Link Officer is also part of this team and coordinates responses to the Ombudsman from relevant departments. The Resident Experience Team are responsible for providing complaints reports to our SLT and members. The Ombudsman Link Officer role sits within the Resident Experience 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	Commentary/explanation as evidence	All investigators ensure complaints on housing matters are fully investigated and resolved and organisational learning captured. Investigating Officers can facilitate prompt resolution by

				liaising with the relevant team or officer.
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	Commentary/explanation as evidence	<p>Learning from complaints is a key focus for the Council and reasons from complaints are informing the Housing Improvement Plan. A wide group of staff from across the Council have been involved in supporting the service improvement and learning from complaints. All teams work closely to ensure complaints on housing matters are fully investigated and resolved and organisational learning captured.</p> <p>There is a specialist well-resourced team within the Housing Service to effectively manage stage 1, stage 2, and Ombudsman complaints.</p> <p>Through training and guidance in the Housing Service a resident and customer centric ethos and way of working is championed to ensure all staff are aware and action appropriately. All investigators handling complaints within the Complaint, Dispute and</p>

				Resolution Team and the Resident Experience Team have completed the HO online training. Continuous ongoing training with feedback to individual officers is in place across both teams. Training and guidance have been delivered to all wider housing teams to improve complaint handling across all Housing Services.
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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	Commentary/explanation as evidence. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	Corporate Complaints Policy in place. All residents are treated fairly and in line with policies whether they have submitted a complaint or not.
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	Please refer to the complaints policy details and the two-stage complaint process. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	The Council operates a two stage complaints process as per our policy. There is no stage zero or informal complaint process. Our aim is to provide early resolution for our residents for any service failures prior to them becoming a complaint.

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	Please refer to the complaints policy details and the two-stage complaint process. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	The council operates a two-stage process as per our complaints policy.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Commentary/explanation as evidence. Please refer to the complaints policy Page 10. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	All complaints are responded via the councils' complaints process with comments received from contractors, they do not provide their own responses.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Commentary/explanation as evidence.	All complaint responses are via the council's process.
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	Commentary/explanation as evidence.	We are including a summary of the complaint in our acknowledgements together with the outcome the resident is expecting. At stage 1 The complaints resolution officer will contact the complainant (where possible) prior to the acknowledgement being sent. For all stage 2 complaints, the investigating officer contacts the complainant to discuss the complaint, communications preferences, and any outcomes they are 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	Commentary/explanation as evidence	This is included in the complaint acknowledgement.
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	Commentary/explanation as evidence	As part of the training, guidance and adherence to the code, all officers investigating complaints act independently and fairly. All investigators aim to resolve conflict and consider all aspects and evidence available to fairly review the complaint.
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	Commentary/explanation as evidence.	All service directorates received guidance and updates on the new HO Complaint Handling Code including ensuring communication updates to complainants. This was completed in May 2024. Our policy details the timescales to respond to complaints and sets out what will we do if we need to agree an extension with the resident
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.	Yes	Commentary/explanation as evidence	In compliance with the Equalities Act, we adapt our procedures and policies to

	<p>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.</p>			<p>meet resident's needs and put in place reasonable adjustments. We ask about specific needs/ requirements on our self-service request form. Contact centres that fill out this self-service request form over the phone on behalf of residents also capture these needs. All housing staff have been briefed through a guidance note issued in March 2023, reminding them to record housing vulnerabilities on the housing system (Northgate). The briefing also included guidance on</p> <ul style="list-style-type: none"> • Learning from complaints and complaint escalation • Impact on residents' wellbeing • Poor customer experience • Potential breach of equalities legislation • Impact on the Housing Revenue Account <p>Staff delivering services and complaint handlers are reminded to check the relevant sections on the housing system to ensure services</p>
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				delivered consider any recorded vulnerabilities. In addition, consideration is given to the training needs of staff through complaint investigations and feedback. Reasonable adjustments are made when managing and dealing with a complaint. Complainants can inform us of any accessibility needs and support needs and we will take the appropriate action to ensure flexibility in our service offer and manage any priority needs.
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	Commentary/explanation as evidence	Within the complaints policy we clearly outline the process for an escalation to stage 2. Training and guidance on refusals unless valid has been delivered to senior managers of departments to cascade in May 2024.
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	Commentary/explanation as evidence	Our case management system includes all details on each case at every stage and contains a full audit trail. The complaints management system enables comprehensive record keeping.

				All records of complaints are logged on our systems and original documents are files in our electronic document management systems. Any reviews, outcomes or other relevant correspondence relating to the complaints are also logged and recorded against the cases.
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	Commentary/explanation as evidence	We aim to provide a remedy and solution at the first point of contact and any stage of the complaint process, the complaint is a priority to resolve. We aim to minimise the need for escalation by getting it right first time. This is embedded within training and guidance across the organisation.
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	Link to the policy referenced. Hammersmith & Fulham Council Unreasonable or Vexatious Behaviour Policy April 2020 (lbhf.gov.uk)	We have a policy to deal with unacceptable behaviour from residents in pursuing complaints and this is published on our website. We use this policy when appropriate. Restrictions are time-limited and reviewed. We are currently reviewing the process supporting this policy to ensure that it links with policies in respect of employee

				and elected member health and safety.
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	Commentary/explanation as evidence	We only use this policy when appropriate. Restrictions are time-limited and reviewed. We do consider all aspects of contact and try to offer solutions and single points of contact initially to allow unrestricted communication arrangements to be in place that are reasonable for the complainant and the council.

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	Commentary/explanation as evidence	Resolved at first point of contact resolution criteria is available within the complaints handling system. This can be utilised for recording any complaints resolution put in place initially with a recorded outcome and agreement with the complainant. Through training and guidance when the complaint is submitted it is triaged by the complaint investigator, if they identify opportunities at this point to resolve at the first point of contact, they will liaise with the complainant to agree resolution.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	Please refer to the complaints policy pages 5 and 6. H&F Corporate Complaints Policy June 2024 (Ibhf.gov.uk)	This is part of our Corporate Complaints policy
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	Please refer to the complaints policy pages 5 and 6.	This is part of our Corporate Complaints policy

	days of the complaint being acknowledged.		H&F Corporate Complaints Policy June 2024 (lbhf.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>Commentary/explanation as evidence.</p> <p>Please refer to the complaints policy pages 6 and 9.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	Where a response could not be sent within the 10 days an extension of up to 10 days is applied but this is only where this is communicated with the resident. If a response cannot be determined within this period, then a further timescale and communication plan will be agreed with the resident. This is detailed in our policy.
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	<p>Commentary/explanation as evidence.</p>	Housing Ombudsman contact details are provided in complaint acknowledgments, delays or extensions communications and final responses about complaints.
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>Commentary/explanation as evidence.</p> <p>Please refer to the complaints policy page 6.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	<p>Responses to repairs complaints are sent within the agreed timescales and any outstanding actions/repairs are tracked to completion. With the case officer being the single point of contact.</p> <p>Stage 2 cases with works outstanding are monitored by a stage 2 monitoring team through to completion. Residents have a named contact in the stage 2</p>

				<p>monitoring team and contact is made within 5 working days. All stage 2 repair works are signed off by a surveyor.</p> <p>Complaints within the Housing Service outside of repairs are also monitored for action to be completed and resolved when a complaint has been responded to. The investigating officer has the responsibility to track actions and timeframes. This can be monitored through the case management system.</p>
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	Commentary/explanation as evidence.	The council ensure that the complaint definition is clear, we aim to ensure this is defined in the acknowledgment. Contact is also made with the complainant to ensure we have captured all the relevant information at the start before the investigation commences.
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	Yes	Commentary/explanation as evidence.	We have ensured training and guidance has been given to all investigators to incorporate other relevant issues raised whilst investigating. We aim to resolve all of the complaint and find a suitable resolution

	already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			as soon as possible, where possible without needing to raise a new complaint, and only then if necessary
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	Commentary/explanation as evidence.	<p>We have templates set up in our case management system that guide officers through each of the seven elements to ensure that all areas specified in the code are addressed.</p> <p>Stage 1 and stage 2 responses are reviewed by a senior officer before they are issued to ensure quality and to ensure that all the issues are addressed. Feedback and regular training are now given to all officers.</p> <p>We have also introduced a quality assurance framework that checks that all these areas are addressed.</p>

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	Commentary/explanation as evidence.	We have a clear 2 stage process within the policy and at all times we ensure complainants are aware of the independent review and

			H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	contact points for the Housing Ombudsman. We have delivered training and guidance across the council to ensure all staff are aware that a stage 2 complainant can be investigated if the complainant requests to escalate.
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	Please refer to the complaints policy page 8. H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	Our complaints policy details that the acknowledgement of all stage 2 complaints includes a summary of the issues and outcomes they are seeking. All stage 2 escalations are contacted by phone (or residents preferred method) so that the scope of the complaint, communications preferences and the outcomes sought can be clarified.
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	Commentary/explanation as evidence.	Through training and guidance all staff have been advised of the process to escalate to stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Commentary/explanation as evidence.	We have separate teams and Officers/Managers dealing with stage 1 and stage 2 complaints. This is part of the process we follow.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Please refer to the complaints policy page 8.	The Complaint, Dispute and Resolution Team and other investigating officer are monitored to ensure

			H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)	adherence to the policy timescales and performance on open cases that are due is monitored daily.
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	<p>Commentary/explanation as evidence.</p> <p>Please refer to the complaints policy page 8.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	For any cases where we are unable to resolve within 20 working days or a subsequent 20-day extension, we are in communication with the resident to agree the timescales and to keep them updated on actions taken.
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	<p>Commentary/explanation as evidence.</p>	We provide the Ombudsman contact details on all case extensions.
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	<p>Commentary/explanation as evidence.</p> <p>Please refer to the complaints policy page 6.</p> <p>H&F Corporate Complaints Policy June 2024 (lbhf.gov.uk)</p>	Responses to Repairs complaints are sent within the agreed timescales and we share a plan of action once it is agreed with the resident. We continue to monitor any outstanding actions with the case officer being the single point of contact. Stage 2 cases with works outstanding are monitored by a closed stage 2 team through to completion. Residents have a named contact in the closed stage 2 team and contact is made within 5 working days. All stage 2 repair works are signed off by a surveyor.

				Complaints within the Housing Service outside of repairs are also monitored for actions to be completed and resolved when a complaint has been responded to. The investigating officer has the responsibility to track actions and timeframes. This can be monitored through the case management system.
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	Commentary/explanation as evidence.	The council ensures that the complaint definition is clear, and we aim to ensure this is defined in the acknowledgment. Contact is also made with the complainant to ensure we have captured all the relevant information at the start before the investigation commences.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 	Yes	Commentary/explanation as evidence.	We have templates set up in our case management system that guide officers through each of the elements to ensure that all areas specified in the code are addressed. Stage one and stage 2 responses are reviewed by a senior officer before they are issued to ensure quality and to ensure that all the issues are

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			addressed. Feedback and regular training are now given to all officers. We have also introduced a quality assurance framework that checks all these elements are included.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Commentary/explanation as evidence.	At stage 2 there is a dedicated team within Housing to respond. However, some complaint investigations may require management at a senior level. When these cases are identified, an appropriate person either supports the investigations or completes and responds, still following the policy and CHC.

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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; 	Yes	Commentary/explanation as evidence. The Council's compensation policies are available on the website. Complaints and compliments London Borough of Hammersmith & Fulham (lbhf.gov.uk)	We have set up a Complaint, Dispute Resolution Team and our process is designed to resolve complaints. Where we get things wrong, we do apologise, often face to face, and offer compensation and seek to quickly rectify the issues working with the resident to agree outcomes.

	<ul style="list-style-type: none"> • 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. 			The team then track that through to completion.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Commentary/explanation as evidence. The Council's compensations policies are available on the website.</p> <p>Complaints and compliments London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p>	We have guidelines in place on compensation and remedies following Ombudsman recommendations. We also cover this in training and use responsibilities under the tenancy agreement as a guide.
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>Commentary/explanation as evidence.</p>	In most cases complaints are in respect of repairs and our responses will include appointments or in some cases a schedule of works which will give details of timescales. We have made significant improvements in following up on repairs after closure of the stage two complaints. In February 2023 we created a new team to do this. When a complaint is closed, it is passed to this team and the resident is advised that an officer will

				<p>contact them in five working days. The resident then receives a call from their point of contact and this person monitors the repair position and maintains regular contact with the resident and the contractor to ensure completion. On completion of the repair a surveyor who is linked to this new team will carry out a post repair inspection so we can be sure that everything has been concluded and the resident is fully satisfied. This approach is having a positive impact and will deliver improvements for our residents.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>Commentary/explanation as evidence.</p> <p>The Council's compensations policies are available on the website.</p> <p>Complaints and compliments London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p>	<p>Included in our compensation policy and follow Ombudsman guidelines on compensation</p>

Section 8: Self-assessment, reporting and compliance

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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<p>Links to the reports are detailed below.</p> <p>Annual Complaints Report 2022/2023 (lbhf.gov.uk)</p> <p>Appendix B - LGSCO Letter to London Borough of Hammersmith Fulham - Annual Review letter 2022-23 (lbhf.gov.uk)</p>	<p>An annual complaints report is published on the LBHF website.</p> <p>The Annual Complaints Report for 23/24 will be published in Q3 24/25. Sections a-f will be included in the 23/24 report.</p>
8.2	<p>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</p>	Yes	<p>Links to the reports are detailed below.</p> <p>Annual Complaints Report 2022/2023 (lbhf.gov.uk)</p>	<p>The annual complaints report and self-assessment are reported though the Council's governance processes. This is through various formats</p>

	complaints. The governing body's response to the report must be published alongside this.		<p>Appendix B - LGSCO Letter to London Borough of Hammersmith Fulham - Annual Review letter 2022-23 (lbhf.gov.uk)</p> <p>Link to the governance pages. Search decision-making documentation London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p> <p>The link below is for the Audit Committee in November 2023, where the self-assessment code was presented at this meeting. Agenda for Audit Committee on Monday, 27th November, 2023, 7.00 pm London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p>	<p>including Strategic Leadership Team reports, Members briefings and Audit Committees. The Member Responsible for Complaints (MRC) reviews all reports.</p> <p>This current CHC self-assessment will follow the governance process, provisional sign off has been agreed through SLT and with the MRC and the Lead Member for Housing.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Commentary/explanation as evidence.	Self – assessments will take place when there is significant changes or restructures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Commentary/explanation as evidence.	This will be completed if requested by the HO.
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	Yes	Commentary/explanation as evidence.	This is included in the Business Continuity plans and we have email contacts for the HO to be able to provide updates.

	must provide a timescale for returning to compliance with the Code.			
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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	Commentary/explanation as evidence.	There is currently a Housing service improvement board who report weekly. Each case is considered on individual outcomes and improvements plan can be associated with the complaints management system if applicable.
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	Commentary/explanation as evidence.	We have implemented a complaint survey which continues to be developed to breakdown to an individual complaint. Business changes are underway with the supplier to develop an improved reporting tool, this should be completed by Q3 24/25. Bespoke reporting is being utilised and insight and learning for effective complaint management and developing a positive culture is part of the service improvements in Housing.
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	Yes	Commentary/explanation as evidence.	Tenant Satisfaction Measures are captured through surveys, and they capture feedback on complaints as well. The Director of Housing newsletter is sent to residents

	<p>residents' panels, staff and relevant committees.</p>		<p>Agenda for Audit Committee on Tuesday, 12th September, 2023, 7.00 pm London Borough of Hammersmith & Fulham (lbhf.gov.uk)</p>	<p>to provide updates on the service. This also includes complaints information and improvements. The Director's report is a standard item at the Housing Representatives Forum and includes information on complaints and improvement.</p> <p>Jointly at resident groups we are reviewing their forward plan and have included an annual report which will incorporate feedback on complaints and lesson learnt. We are currently considering how we can share this information wider.</p> <p>Lessons learnt and improvements; with adherence to the CHC we capture insight and learning on primary causes for a complaints and root causes once the investigation is completed.</p> <p>Performance monitoring and improvements; Currently performance and insight are presented weekly on Housing Ombudsman cases and complaints to the Chief</p>
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				<p>Executive, Directors, and Assistant Directors for Housing complaints. This includes detailed reports on repairs complaint management with contractors and the DLO.</p> <p>There is a fortnightly Complaints Housing Board chaired by the Head of Complaints, Dispute and Resolution to focus on learning, updates, and outcomes.</p> <p>There is a monthly Operational Learning Board led by a Service Manager with learning, feedback and changes required captured at service level.</p> <p>Key Performance Indicators for complaints upheld is reported to services monthly and reported to Strategic Leadership Team (SLT) quarterly.</p> <p>Quarterly performance in respect of Ombudsman cases is provided to SLT and they also receive reports on the annual performance data and the annual letter from the</p>
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				Housing Ombudsman. Complaint handling is reported to members quarterly as part of our performance reporting to Political Cabinet
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	Commentary/explanation as evidence.	The Director Chief Operating Officer of Corporate Services. oversees the compilation of the CHC self-assessment and the associated actions. The Director Chief Operating Officer is responsible for reporting to SLT assurance complaint key performance indicators and relevant member committees on corporate complaints performance and analysis of route cause. The post holder is the owner of the corporate complaints policy and complaints handling procedures.
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	Commentary/explanation as evidence.	Cabinet Member Cllr Kwon is the lead member and responsible for complaints for LBHF. (Member Responsible for Complaints (MRC))
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	Yes	Commentary/explanation as evidence.	Cabinet Member Cllr Kwon has oversight of all governance reports on Complaints council wide.

	performance. This person must have access to suitable information and staff to perform this role and report on their findings.			Cabinet Member Cllr Umeh is the lead member responsible for Housing and receives weekly updates about the current position for oversight and scrutiny of complaints.
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.	Yes	Commentary/explanation as evidence.	The Cabinet Member Cllr Kwon is updated on a regular basis with an overview of the current complaint handling categories and outcomes. The CHC code self-assessment, the annual complaints reports and SLT quarterly reports are shared.
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	Commentary/explanation as evidence.	Investigators within the Complaint, Dispute and Support Team and the Resident Experience Team have a standard objective for complaint handling. Across all Housing Services we are aiming to ensure a standard objective for complaints for all relevant staff.

				<p>The approach was to ensure collaborative working across teams and departments. Identifying issues and eradicating a blame culture to ensure professional complaints handling, ownership and resolution.</p>
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