

## 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	The complaint process on our website uses this definition.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint process follows this requirement.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their	Yes	<a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	Our Housing Complaints Policy follows this requirement.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint process follows this requirement.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We comply with this requirement.
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	Yes	We contact tenants if they express that they are 'very dissatisfied' with our service on transactional surveys.	When conducting telephone satisfaction surveys, the operative sends an alert to the Housing Complaints team if an issue is raised that is not part of the survey.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must provide details of how residents can complain.			When the results of the Tenant Satisfaction Measures have been received, we will identify 'very dissatisfied' customers and offer further support, including logging a complaint.

## 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>We will only refuse a complaint, using the following exclusions:</p> <ul style="list-style-type: none"> <li>• Service request (e.g., a repair / enquiry)</li> <li>• 12 months since the original incident (discretionary)</li> <li>• Duplication</li> <li>• Legal proceedings have commenced</li> <li>• Accident or Incident – handled by Housing Compliance team</li> <li>• Housing Disrepair Protocol in progress.</li> </ul> <p>We are also unable to investigate a complaint relating to a matter that we have no jurisdiction over.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.</p> <p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>The complaint exceptions were previously reviewed and agreed by a tenant group, the Complaint process on our website now needs to be reviewed again by a tenant group with the exclusions listed above in 2.1</p>
2.3	<p>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</p>	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>We comply with this requirement.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	made outside this time limit where there are good reasons to do so.			
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	If the Council decides not to accept a complaint, a detailed explanation is provided setting out the reasons why the matter is not suitable for the complaints process and how to refer the matter to the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We will review each complaint individually, considering the circumstances of each case.

### 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>Complaints can be made via the following channels which is set out in the complaint process on our website.</p> <p>Communication methods are:</p> <ul style="list-style-type: none"> <li>• Phone</li> <li>• Letter</li> <li>• Email</li> <li>• Visiting the Council Offices</li> <li>• A home visit</li> <li>• Online form</li> <li>• Via our Facebook page</li> <li>• Through an appointed representative</li> <li>• Housing Drop-In Surgeries</li> </ul>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware	Yes	<a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	Residents can make a complaint through any officer, who will refer the



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.			matter to the Housing Complaints team.
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>Website:  <a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a></p> <p>An article is placed in our Tenant's Magazine (Insight) about our Complaints Service, which is distributed to all residents.</p> <p>Our Complaints Leaflets are placed in the resident's community rooms and distributed at Housing Drop-in Surgeries, Community Events and our Tenant Welcome Packs.</p>	High complaint volumes are not seen as a negative, but do confirm our process is advertised appropriately.
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	<a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	The complaint process on our website contains all required information.

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.		<a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	<p>The Housing Complaints Policy is publicised in the following ways:</p> <ul style="list-style-type: none"> <li>• Website</li> <li>• Tenant Annual Report</li> <li>• Tenant's Magazine (Insight)</li> <li>• Social Media</li> <li>• Leaflets</li> <li>• Housing Drop-In Surgery</li> <li>• Housing Complaints Stage One &amp; Two responses</li> <li>• Posters in communal spaces and Customer First (public facing service).</li> </ul>
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We comply with this requirement.
3.7	Landlords must provide residents with information on their right to access the	Yes	<p>Website:</p> <p><a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-</a></p>	The Housing Ombudsman Service details are

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Ombudsman service and how the individual can engage with the Ombudsman about their complaint.		<p>information/housing-complaints-and-feedback/</p> <p>Tenant Annual Report:  <a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/">https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/</a></p>	<p>provided in the following ways:</p> <ul style="list-style-type: none"> <li>• Complaint correspondence at Stage One and Two</li> <li>• Tenant Annual Report</li> <li>• Tenant's Magazine (Insight)</li> <li>• Website.</li> </ul>

## 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	<p>2x Housing Business Support Officers</p> <p>1x Housing Policy Officer</p> <p>Council Housing and Development Advisory Board (12+ members)</p>	<p>We have two Housing Business Support Officers (HBSO) in post, who function as our 'Complaints Officers'.</p> <p>We have one Housing Policy Officer in post, who act as our liaison between Exeter City Council and the Housing Ombudsman Service.</p> <p>Our Housing Policy Officer and 'Complaints Officers' report all Performance KPIs to our governing Body: The Council Housing &amp; Development Advisory Board (CHADAB).</p>
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	Complaints Officer has access to all Exeter City Council staff, including Senior Management.	We comply with this requirement.

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	Yes	The Housing Complaints team offer an internal Complaints Clinic for the wider Housing Services Officers to attend, to ensure our approach is shared with the whole service.	<p>We prioritise Complaint Handling and learning from complaints.</p> <p>Our Housing Business Support Officers have completed or will complete during in their service:</p> <ul style="list-style-type: none"> <li>• Internal training</li> <li>• External training including Housing Ombudsman Service events, Chartered Institute of Housing courses and other relevant training material.</li> </ul> <p>Housing Complaints is a core service within our Housing Services Department.</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	<a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	We have a single policy in place for Housing Complaints.  Residents are not treated differently if they make a complaint.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We seek an early resolution wherever possible.  We do not have a third stage in our 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We do not have a third stage in our process.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We comply with this requirement.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	N/A	No third parties managing our housing stock
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	Housing Ombudsman templates and guidance information is used for all complaint correspondence.  <a href="https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf">https://exeter.gov.uk/media/00ofxfmz/housing-complaints-policy.pdf</a>	Acknowledgement emails contain the required information.

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.	Yes	We follow Housing Ombudsman Guidance, when sending all complaint correspondence.	We comply with this requirement.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	We follow Housing Ombudsman Guidance, when sending all complaint correspondence. This information is discussed in our Complaints Clinics to ensure that all staff are aware of the Housing Ombudsman's requirements.	We comply with all points in this requirement.
5.9	Where a response to a complaint will fall outside the timescales set out in this	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint process on our website details complaint extensions may



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.			<p>be required for complex matters. Our extensions do not go over 10 further days unless there are exceptional circumstances.</p> <p>Regarding investigation time outside of the extension period, if an agreement is not reached, we will provide the Housing Ombudsman contact details.</p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<a href="https://exeter.gov.uk/media/5410/ecc-equality-and-diversity-policy-review-september-2020-final.pdf">https://exeter.gov.uk/media/5410/ecc-equality-and-diversity-policy-review-september-2020-final.pdf</a>	<p>We do not have a Reasonable Adjustment Policy, but the Council's Equality Policy includes the points which would otherwise be covered. EQIA (Equality Impact Assessments) are completed when creating policies, strategies &amp; projects.</p> <p>Housing staff attend:</p> <ul style="list-style-type: none"> <li>• Equality &amp; Diversity Impact Workshop</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<ul style="list-style-type: none"> <li>• Housing Ombudsman webinars</li> <li>• Internal Complaints handling workshops, delivered by the Housing Complaints Department</li> <li>• Other relevant training sessions.</li> </ul>
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>Escalation details can be found in our complaint process on our website.</p> <p>In rare circumstances where we refuse an escalation, a full explanation will be provided to the resident as well as Housing Ombudsman contact information.</p> <p>We reserve the right to refuse a complaint, using the following exclusions:</p> <ul style="list-style-type: none"> <li>• if it is determined to be a service request e.g., a repair or enquiry</li> <li>• If more than 12 months has elapsed since the</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>issue arose-we will use our discretion over this and will consider each complaint individually</p> <ul style="list-style-type: none"> <li>• It duplicates another complaint already made or in process</li> <li>• Legal proceedings have commenced. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• If there is an accident or incident – this will be handed over to the Housing Compliance team for their expertise</li> <li>• There is a Housing Disrepair Protocol in progress</li> <li>• The complaint is made in a vexatious manner (see below).</li> </ul>

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	<p>Our Housing management I.T. system (Open Housing) is permission driven with access given to Housing staff only.</p> <p>Our IT provider is Strata Service Solutions, who ensure all records are kept securely. All staff view our records through a secure Virtual Private Network (VPN).</p>	<p>We are confident that our record keeping is completed to a high standard.</p> <p>All complaint correspondence is uploaded to our Housing database and logged on our monitoring documents.</p>
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	<p>If the answer to a complaint is known, it is provided to the complainant as early as possible.</p> <p>Investigating Officers can resolve a complaint at any stage of the process.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their	Yes	<a href="https://exeter.gov.uk/council-and-democracy/contact-us/comments-compliments-and-complaints/complaints-and-unacceptable-behaviour/">https://exeter.gov.uk/council-and-democracy/contact-us/comments-compliments-and-complaints/complaints-and-unacceptable-behaviour/</a>	<p>When a tenant demonstrates persistent and vexatious behaviour, we invoke our Acceptable Behaviour Contract which</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			manages communication in line with the Unacceptable Customer Behaviour Policy.
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	<a href="https://exeter.gov.uk/media/5408/unacceptable-customer-behaviour-policy-aug-2020.pdf">https://exeter.gov.uk/media/5408/unacceptable-customer-behaviour-policy-aug-2020.pdf</a>	All restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

## Section 6: Complaint 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.	Yes	Our Housing management I.T. system (Open Housing) has alerts to ensure all officers viewing the tenant's records are made aware of any vulnerabilities when accessing the main screen.	If the answer to a complaint is known, it is provided to the complainant as early as possible.  Investigating Officers look to resolve a complaint at any the earliest opportunity.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.			The complexity of the complaint and the complainant's vulnerabilities are considered when investigating a complaint.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our timescales are set in line with the Housing Ombudsman's Complaint Handling Code.  In exceptional circumstances, for example when evidence is required to begin an investigation, an acknowledgement may be sent later than 5 days.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our timescales are in line with the Housing Ombudsman's Complaint Handling Code (Stage One – 10 days).
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint process on our website notes complaint extensions may be required for complex matters. Our extensions do not go over 10 additional days unless

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			there are exceptional circumstances.
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	We provide the Housing Ombudsman contact details in our correspondence.  <a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	In rare circumstances where we investigate outside of the extension period, a full explanation will be provided to the resident as well as Housing Ombudsman contact information.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	If the answer to a complaint is known, it is provided to the complainant as early as possible. Outstanding actions are tracked by the relevant team delivering the complaint resolution. We do not offer regular updates; however, a complainant can request an update at any time.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint responses are created using the Housing Ombudsman response template and guidance.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	policy, law and good practice where appropriate.			
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	When a tenant raises additional points during an investigation, we will consider the points raised and where appropriate include these as part of the complaint.	We comply with this requirement.
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> </ul>		<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint responses are created using the Housing Ombudsman response template and guidance.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			

## 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Set out in the complaint process on our website.  We will not investigate a complaint at Stage Two if it was not part of the original Stage One complaint, but we would open a complaint at Stage One for any new element raised by the complainant.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Set out in the complaint process on our website.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-</a>	We do not require this, but we ask complainants to provide if possible to

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		information/housing-complaints-and-feedback/	ensure a full and proper investigation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Set out in the complaint process on our website.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Set out in the complaint process on our website.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our timescales are set in line with the Housing Ombudsman's Complaint Handling Code (Stage Two – 20 days).
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	In rare circumstances where we investigate outside of the extension period, a full explanation will be provided to the resident as well as Housing Ombudsman contact information.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	If the answer to a complaint is known, it is provided to the complainant as early as possible. Outstanding actions are tracked by the relevant team delivering the complaint resolution. We do not offer regular updates; however, a complainant can request an update at any time.
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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint responses are created using the Housing Ombudsman response template and guidance.
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;	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	Our complaint responses are created using the Housing Ombudsman response template and guidance.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/">https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/</a>	We comply with this requirement.

## 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.</p> <p>These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> </ul>	Yes	All Officers are provided with Housing Ombudsman response guidance to ensure we comply with this requirement.	Our complaint responses are created using the Housing Ombudsman response template and guidance.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We follow the Housing Ombudsman's resolution guidance.	Our remedies reflect the impact on the resident.
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	We follow the Housing Ombudsman's resolution guidance.	Our remedies contain a compensation breakdown and an estimated payment date.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We follow the Housing Ombudsman's resolution guidance.	We comply with this requirement.

## 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<a href="https://exeter.gov.uk/">https://exeter.gov.uk/</a>	<p>We will produce the following annual reports for scrutiny and challenge:</p> <ul style="list-style-type: none"> <li>a. HOS Self-Assessment</li> <li>b. Housing Complaints performance report</li> <li>c. All findings of non-compliance with this code</li> <li>d. Service Improvement Plan</li> <li>e. Housing Ombudsman Performance Reports</li> <li>f. Any other relevant Housing Ombudsman Reports or publications</li> </ul>

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.	Yes	<a href="https://exeter.gov.uk/">https://exeter.gov.uk/</a>	The annual complaints performance and service improvement report will be reported to The Council Housing & Development Advisory Board (CHADAB) and our Complaints & Performance Group (Tenants). In addition, they will be uploaded to the Housing Complaints section of our website, including the response from the CHADAB and Complaints & Performance Group. A summary is also included in the Tenant Annual Report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	We will comply with this requirement when required.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We will comply if this if requested by the Housing Ombudsman.
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	N/A	We will comply with this requirement when necessary.

## 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	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/">https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/</a>	Potential service improvements are discussed in the Complaints & Performance Group, Staff Complaints Clinic, Monthly Manager Meetings and other internal discussions.
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	Potential service improvements are discussed in the Complaints & Performance Group, Staff Complaints Clinic, Monthly Manager Meetings and other internal discussions.	Lessons learned from our complaints are used to identify any service improvements, policies etc. These are implemented by Housing staff.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<a href="https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/">https://exeter.gov.uk/housing/information-for-council-tenants/tenant-annual-report-2022-2023/</a>	Service improvements and wider learning will be reported to The Council Housing & Development Advisory Board (CHADAB) and our Complaints & Performance Group (Tenants).



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				A summary is also included in the Tenant Annual Report.
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	Our Housing Lead - Performance, Strategy & Resident Involvement is the senior person that is responsible for complaints handling, policies, and risks. However, data themes and trends are the responsibility of the team.	We have three roles in this area of the service:  Housing Lead - Performance, Strategy & Resident Involvement  Housing Policy Officer  Housing Business Support Officer
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').	No	N/A	To be discussed at the next meeting of the Council Housing & Development Advisory Board. Implementation to follow.
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	No	N/A	To be updated when 9.5 has been completed.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	information and staff to perform this role and report on their findings.			
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	No	N/A	We will ensure this is completed when the MRC is in place.
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"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with</li> </ul>	Yes	We hold Complaints Workshops and Clinics to ensure we comply with this requirement.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			