Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually. Evidence should be included to support all statements with additional commentary, as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **1.2** | A complaint must be defined as:‘*an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf,**affecting an individual resident or group of residents*. | Yes | The definition in our current complaints policy is consistent with the definition in the Housing Ombudsman Code (the Code).  <https://www.westkent.org/complaint/> |
| **1.3** | The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy. | Yes | We accept complaints via a third party or representative (providing it is clear the complainant has consented to the advocate contacting us on their behalf)It is in our policy and procedure that the resident does not have to use the word complaints for us to treat it as such  |
| **1.6** | … if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | Yes | It is within our policy that if a resident requests a complaint is logged about an issue, we will log it as such.  |
| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | Exclusions are clearly set out within our Policy, including subject to legal action where a claim form has been submitted to court and where the incident complained about took place more than six months before the complaint is made (unless there are exceptional reasons why, e.g., safeguarding or health and safety issues).  |

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| **1.8** | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. | Yes | Exclusions are set out clearly within our Policy |
| **1.9** | If a landlord decides not to accept a complaint, a detailed 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 thatdecision to the Ombudsman. | Yes | A clear response is provided to the resident in writing including setting out their right to take their complaint to the Ombudsman |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **1.4** | Landlords should recognise the difference between a | Yes | Service Requests are considered outside of our complaints process and responded by the relevant team.We have a ‘Quick Fix’ quick resolution stage of our procedure to resolve issues quickly.Complaint training is delivered to all staff |
| **service request**, where a resident may be unhappy |
| with a **situation** that they wish to have rectified, and a |
| **complaint** about the **service** they have/have not |
| received. |
| **1.5** | Survey feedback may not necessarily need to be | Yes | We aim where possible to call back dissatisfied residents where we receive low scores or negative feedback from surveys, e.g., STAR surveys or our monthly Rant & Rave transactional surveys |
| treated as a complaint, though, where possible, the |
| person completing the survey should be made aware of |
| how they can pursue their dissatisfaction as a complaint |
| if they wish to. |

Section 2 - Accessibility and awareness Mandatory ‘must’ requirements

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **2.1** | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all the potential channels, there must be more than one route of access into the complaintssystem. | Yes | We accept complaints however they are received including in person, by phone, email, Live Chat, online form or via an advocate or representative (providing it is clear the complainant has consented to the advocate contacting us on their behalf). If the customer contacts us in public social media pages, we’ll ask the customer to contact us directly to protect your privacy.<https://www.westkent.org/about-us/our-complaints-process/make-a-complaint/> |
| **2.3** | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding. | Yes | We have a two-stage complaint process which specifies the timeframes for responding at each stage within the Policy.  |
| **2.4** | Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website. | Yes | Our website includes information on how to make a complaint. Our complaints policy and process are available on our website: <https://www.westkent.org/complaint/> |
| **2.5** | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs.Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training todeal with such requests. | Yes | We have a section on reasonable adjustments within our complaints policy. All staff attend Equality, Diversity, and Inclusion trainingWe offer translation and interpretation services and other reasonable adjustments to ensure fair access to our service. Our Equality and Diversity Policy and our Diversity and Inclusion Framework sets out how we support our customers with diverse needs, views and preferences when delivering services. Where reasonable we provide extra support to help complainants because of protected characteristics.  |
| **2.6** | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence withResidents | Yes | The policy and process are available on our website <https://www.westkent.org/about-us/our-complaints-process/policies/>The Complaint Handling Code is available on our website:<https://www.westkent.org/about-us/contact-us/complaints-compliments-and-feedback/>Information on complaint handling is published in our Annual Resident report, quarterly Neighbourhood Newsletter and throughout the complaint process (the Ombudsman Scheme) |

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| **2.7** | Landlords must provide residents with contactinformation for the Ombudsman as part of its regular correspondence with residents.  | Yes | Contact information is available on our website, in newsletters and annual reports and as part of complaint letter responses |
| **2.8** | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord’s complaints process is exhausted. | Yes | Provided at each stage of our process as part of the complaint response |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **2.2** | Where a landlord has set up channels to communicate | Yes | This is within our complaints Policy and on our website. If you contact us in public social media pages, well ask you to contact us directly to protect your privacy.<https://www.westkent.org/about-us/our-complaints-process/make-a-complaint/> |
| with its residents via social media, then it should expect |
| to receive complaints via those channels. Policies |
| should contain details of the steps that will be taken |
| when a complaint is received via social media and how |
| confidentiality and privacy will be maintained. |

Section 3 - Complaint handling personnel Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **3.1** | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaintsofficer.” | Yes | We have a central Customer Resolution team responsible for complaint handling.A complaints report is considered quarterly by the Communities & Housing Committee and annually to the Board.  |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts ofinterest. | Yes | All handlers are trained including attending the Ombudsman online training. There is no known conflict of interest. |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **3.3** | Complaint handlers should: | Yes | We have a dedicated customer resolution team, with the skills and training to manage complaints. They have the authority and autonomy to ensure engagement from other departments to resolve disputes. They have access to staff at all levels to facilitate quick resolution of complaints. Any internal blockages are escalated as required.  |
| * be able to act sensitively and fairly
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| * be trained to handle complaints and deal with
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| distressed and upset residents |
| * have access to staff at all levels to facilitate quick
 |
| resolution of complaints |
| * have the authority and autonomy to act to resolve
 |
| disputes quickly and fairly. |

Section 4 - Complaint handling principles Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **4.1** | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord’s audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident’s concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘pre-complaint stage’) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure withinfive days of receipt. | Yes | Our complaints process has two formal stages. Where we can resolve an issue quickly such as an issue with a repair appointment, we will do this immediately. We call this a ‘Quick Fix’ |

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| **4.2** | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between bothparties. | Yes | We have updated our complaints policy to confirm who the complaint handler will be within two working days, and a full acknowledgement will be sent within five working days to assist with the process of setting out our understanding of the complaint including seeking clarification where required |
| **4.6** | A complaint investigation must be conducted in an impartial manner. | Yes | The central complaints team has the autonomy to make decisions, seeking information from both parties before deciding. |
| **4.7** | The complaint handler must:* deal with complaints on their merits
* act independently and have an open mind
* take measures to address any actual or perceived conflict of interest
* consider all information and evidence carefully
* keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.
 | Yes | The Customer Resolution Team comply with these principles in their approach to managing complaints. Complaints which are treated confidentially are marked secure in our case manager system, so they are anonymous in our reporting.  |
| **4.11** | Landlords must adhere to any reasonablearrangements agreed with residents in terms of frequency and method of communication | Yes | We will discuss preferences and reasonable adjustments that the resident requires and will agree reasonable arrangements such as email only, calling to go through any correspondence by phone.  |
| **4.12** | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:* set out their position
* comment on any adverse findings before a final decision is made.
 | Yes | Where a complaint is directed at a staff member, Staff are made aware of the complaint and given the opportunity to comment and set out their position via discussion with their manager or the central complaints team. In most cases information to conclude the case is available within notes captured on our systems. |
| **4.13** | A landlord must include in its complaints policy itstimescales for a resident to request escalation of a complaint | Yes | This is included in our complaints policy |
| **4.14** | A landlord must not **unreasonably refuse** to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. | Yes | As per our Complaints Policy |
|  | Reasons for declining to escalate a complaint must be clearly set out in a landlord’s complaints policy and must be the same asthe reasons for not accepting a complaint. | Yes | We have updated and amalgamated the reasons for declining to escalate and reasons for not accepting a complaint into one.  |
| **4.15** | A full record must be kept of the complaint, any review, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence withother parties and any reports or surveys prepared. | Yes | A full record of the complaint is made in CRM. Copies of any correspondence including complaint response letters, correspondence with third parties, reports and surveys are securely filed in our EDRM (electronic document management) system  |
| **4.18** | Landlords must have policies and procedures in place for managing unacceptable behaviour from residentsand/or their representatives when pursuing a complaint. | Yes | There is a section on managing unacceptable behaviour from residentsand/or their representatives when pursuing a complaint within our complaints Policy.We have recently drafted an unacceptable behaviour policy and procedure for residents. We will implement both documents in the coming months  |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **4.3** | Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | We contact residents as part of the initial investigation to discuss their complaint, understand their issues and expected outcomes. Where an expectation is unrealistic, we will advise this at the outset  |
| **4.4** | A complaint should be resolved at the earliest possible | Yes | We will work to resolve a complaint at the earliest opportunity. Our focus is on resolution for the resident, and we prioritise urgent actions, for example a serious repair requirement |
| opportunity, having assessed what evidence is needed |
| to fully consider the issues, what outcome would |
| resolve the matter for the resident and whether there |
| are any urgent actions required. |
| **4.5** | Landlords should give residents the opportunity to have | Yes | Yes, there is a section in the complaints policy about using an advocate or representative to pursue a complaint.  |
| a representative deal with their complaint on their |
| behalf, and to be represented or accompanied at any |
| meeting with the landlord where this is reasonable. |
| **4.8** | Where a key issue of a complaint relates to the parties’ | Yes | We will set out in any correspondence the understanding of the obligations of both parties  |
| legal obligations landlords should clearly set out their |
| understanding of the obligations of both parties. |

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| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Where the resident already knows the job title and name of the staff member, we may choose to name the staff member in our response. We are careful to ensure as a landlord, we take collective responsibility for our service failure and not apportion responsibility or single out individual members of our staff or contractors’ staff for criticism. |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | During the course of a complaint, we will update the resident at least on a weekly basis. |
| **4.16** | Landlords should seek feedback from residents in | Yes | All complainants automatically receive a short satisfaction survey through Uplands Rant & Rave. All dissatisfied residents scoring us a 1 or 2 are called by West Kent to resolve their concern. |
| relation to the landlord’s complaint handling as part of |
| the drive to encourage a positive complaint and |
| learning culture. |
| **4.17** | Landlords should recognise the impact that being | Yes | Staff training on complaints delivered to all staffLessons learned are shared and discuss with staff, managers and senior leadership team, articles placed on our intranet to help learning.  |
| complained about can have on future service delivery. |
| Landlords should ensure that staff are supported and |
| engaged in the complaints process, including the |
| learning that can be gained |
| **4.19** | Any restrictions placed on a resident’s contact due to | Yes | We will consider the residents need before any restriction on their contact is made due to unacceptable behaviour  |
| unacceptable behaviour should be appropriate to their |
| needs and should demonstrate regard for the |
| provisions of the Equality Act 2010. |
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Section 5 - Complaint stages Mandatory ‘must’ requirements Stage 1

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| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **5.1** | Landlords must respond to the complaint **within 10 working days** of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This shouldnot exceed a further 10 days without good reason. | Yes | Our complaints policy sets out the timescales for responses and extensions. We achieved 96% response within the Ombudsman target in 2021/22.  |
| **5.5** | A complaint response must be sent 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 expeditiously with regular updates provided to the resident. | Yes | A complaint response is sent to the resident when an answer to the complaint is known.Outstanding actions are co-ordinated, tracked and residents updated. The responsibility for this process has recently moved under the control of the central customer resolution team.  |

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| **5.6** | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Our responses cover this requirement. |
| **5.8** | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:* the complaint stage
* the decision on the complaint
* the reasons for any decisions made
* the details of any remedy offered to put things right
* details of any outstanding actions
* details of how to escalate the matter to stage two if the resident is not satisfied with the answer
 | Yes | Our responses cover this – This is set out in the procedure  |

Stage 2

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **5.9** | If all or part of the complaint is not resolved to the resident’s | Yes | Where we decline an escalation request, we explain this to the resident in writing setting out the reasons why. Housing Ombudsman information is included within the written correspondence  |
| satisfaction at stage one it must be progressed to stage two of |
| the landlord’s procedure, unless an exclusion ground now |
| applies. In instances where a landlord declines to escalate a |
| complaint it must clearly communicate in writing its reasons for |
| not escalating as well as the resident’s right to approach the |
| Ombudsman about its decision. |
| **5.10** | On receipt of the escalation request, landlords must set out their | Yes | We have changed our Policy to include: residents will be contacted within five working days of an escalation request to fully understand their reasons for escalation; and the full scope of the stage two complaint is agreed between both parties  |
| understanding of issues outstanding and the outcomes the |
| resident is seeking. If any aspect of the complaint is unclear, the |
| resident must be asked for clarification and the full definition |
| agreed between both parties. |
| **5.11** | Landlords must only escalate a complaint to stage two once it | Yes | A complaint will only be escalated to stage two following the closure of the stage one complaint. A different member of the Customer Resolution Team will consider the complaint at stage two  |
| has completed stage one and at the request of the resident. |

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| **5.12** | The person considering the complaint at stage two, must not be |  |  |
| the same person that considered the complaint at stage one. |
| **5.13** | Landlords must respond to the stage two complaint **within 20** | Yes | Our complaints policy sets out the timescales for responses and extensions. Our performance in 2021/22 achieved 96%  |
| **working days** of the complaint being escalated. Exceptionally, |
| landlords may provide an explanation to the resident containing |
| a clear timeframe for when the response will be received. This |
| should not exceed a further 10 days without good reason. |
| **5.16** | Landlords must confirm the following in writing to the resident at | Yes | We do not have a third stage |
| the completion of stage two in clear, plain language: |
| * the complaint stage
 |
| * the complaint definition
 |
| * the decision on the complaint
 |
| * the reasons for any decisions made
 |
| * the details of any remedy offered to put things right
 |
| * details of any outstanding actions
 |
| **and** |
| * if the landlord has a third stage, details of how to escalate
 |
| the matter to stage three |
| * if this was the final stage, details of how to escalate the
 |
| matter to the Housing Ombudsman Service if the resident |
| remains dissatisfied. |

Stage 3

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **5.17** | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. Aprocess with more than three stages is not acceptable under any circumstances. | N/A | We operate a two-stage complaints process |

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| **5.20** | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:* the complaint stage
* the complaint definition
* the decision on the complaint
* the reasons for any decisions made
* the details of any remedy offered to put things right
* details of any outstanding actions
* details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied
 | N/A |  |

Best practice ‘should’ requirements Stage 1

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **5.2** | If an extension beyond 20 working days is required to enable the | Yes | We agree extensions with the complainant.  |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.3** | Where agreement over an extension period cannot be reached, | Yes | We extend with agreement of the resident. Should the resident not agree then we will provide the details of the Housing Ombudsman and continue to investigate the complaint to resolution.  |
| landlords should provide the Housing Ombudsman’s contact |
| details so the resident can challenge the landlord’s plan for |
| responding and/or the proposed timeliness of a landlord’s |
| response. |
| **5.4** | Where the problem is a recurring issue, the landlord should | Yes | Where information is still available and complies with our Privacy notice and retention period. |
| consider any older reports as part of the background to the |
| complaint if this will help to resolve the issue for the resident. |
| **5.7** | Where residents raise additional complaints during the | Yes | Where possible we will aim to do this if it does not unduly delay the response |
| investigation, these should be incorporated into the stage one |
| response if they are relevant and the stage one response has |
| not been issued. Where the stage one response has been |
| issued, or it would unreasonably delay the response, the |
| complaint should be logged as a new complaint. |

Stage 2

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **5.14** | If an extension beyond 10 working days is required to enable the | Yes | We extend with agreement of the resident |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.15** | Where agreement over an extension period cannot be reached, | Yes | We extend with agreement of the resident. Should the resident not agree then we will provide the details of the Housing Ombudsman and continue to investigate the complaint to resolution.  |
| landlords should provide the Housing Ombudsman’s contact |
| details so the resident can challenge the landlord’s plan for |
| responding and/or the proposed timeliness of a landlord’s |
| response |

Stage 3

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **5.18** | Complaints should only go to a third stage if the resident has | N/A | We only have a two-stage complaints process |
| actively requested a third stage review of their complaint. Where |
| a third stage is in place and has been requested, landlords must |
| respond to the stage three complaint **within 20 working days** of |
| the complaint being escalated. Additional time will only be |
| justified if related to convening a panel. An explanation and a |
| date for when the stage three response will be received should |
| be provided to the resident. |
| **5.19** | Where agreement over an extension period cannot be reached, | N/A |  |
| landlords should provide the Housing Ombudsman’s contact |
| details so the resident can challenge the landlord’s plan for |
| responding and/or the proposed timeliness of a landlord’s |
| response. |

Section 6 - Putting things right Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **6.1** | Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it hasalready taken, or intends to take, to put things right. | Yes | This is part of our approach, and this information is visible within our response letters and calls.  |
| **6.2** | Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered orwould cause unfairness to other residents. | Yes | We have a Compensation Policy which sets out levels of compensation. This is being reviewed to ensure it is in line with the HOS recommended compensation levels. We expect the review to be completed by 31 October 2022. |
| **6.5** | 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 | The Customer Resolution team will track agreed actions to completion in line with this code.  |
| **6.6** | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put toas well as any distress and inconvenience caused. | Yes | We consider these issues and consult our in-house solicitor where appropriate.  |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **6.3** | Landlords should look beyond the circumstances of the | Yes | We have a lesson learned approach which looks more widely at changes we need to make to process or the way we work.Lessons learned are reported to the Communities & housing Committee  |
| individual complaint and consider whether anything needs to be |
| ‘put right’ in terms of process or systems to the benefit of all |
| residents. |
| **6.7** | In some cases, a resident may have a legal entitlement to | Yes | We consider these issues and consult our in-house solicitor where appropriate. |
| redress. The landlord should still offer a resolution where |
| possible, obtaining legal advice as to how any offer of resolution |
| should be worded. |

Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **7.2** | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutinypanels. | Yes | Information on complaint handling is published in our Annual Resident report, to our resident scrutiny committee, Communities and Housing Committee, staff meetings and forums, senior leadership meetings. |

**Best practice ‘should’ requirements**

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:****Yes/No** | **Evidence, commentary, and any explanations** |
| **7.3** | A member of the governing body should be appointed to have | Yes | The West Kent Board Chair has lead responsibility for complaints. We report to Communities & Housing Committee quarterly and annually to the Board. We also update the Board through the Chief Executive’s update report where appropriate.  |
| lead responsibility for complaints to support a positive complaint |
| handling culture. This role will be responsible for ensuring the |
| governing body receives regular information on complaints that |
| provides insight to the governing body on the landlord’s |
| complaint handling performance. |
| **7.4** | As a minimum, governing bodies should receive: | Partial | We report to Communities & Housing quarterly and annually to the Board which contains information in the first two bullet points.We include any relevant information from the HOS including all HOS cases plus findings and outcomes from their investigations. HOS cases are also reported quarterly to the Board in the Chief Executive’s update.We have not received an annual performance report from the Housing Ombudsman as we have not had five determinations in one year. It is unlikely we will receive a performance report in 2023 as there were only three determinations in 2021-2022. It is likely that we will receive a performance report in 2024 as we have received four determinations so far in 2022-2023.We have not had any maladministration findings to date, but these will be reported immediately to the Board Chair and C&H and the Board in their reports. |
| * Regular updates on the volume, categories, and outcome of
 |
| complaints, alongside complaint handling performance |
| including compliance with the Ombudsman’s orders |
| * Regular reviews of issues and trends arising from complaint
 |
| handling, |
| * The annual performance report produced by the
 |
| Ombudsman, where applicable |
| * Individual complaint outcomes where necessary, including
 |
| where the Ombudsman made findings of severe |
| maladministration or referrals to regulatory bodies. The |
| implementation of management responses should be |
| tracked to ensure they are delivered to agreed timescales. |
| The annual self-assessment against the Complaint Handling |
| Code for scrutiny and challenge. |

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| **7.5** | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training. | Yes | Reports are submitted to our senior management and used to inform staff and contractors |
| **7.6** | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:* have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments
* take collective responsibility for any shortfalls identified through complaints rather than blaming others
* act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.
 | Partial | We will seek to adopt the professional standards set out by the Chartered Institute of HousingRecent ‘Making the Difference’ training for all staff encompasses the key objectives listed. The training lessons will be embedded and monitored as part of a long- term programme of change. Staff are set annual objectives which include customer service and complaints where appropriate to the role.  |

Section 8 - Self-assessment and compliance Mandatory ‘must’ requirements

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary, and any explanations** |
| **8.1** | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with itsrequirements. | Yes | We are using the revised Code to conduct our 2022 self-assessment  |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | We have not had a significant restructure requiring a review of our self-assessment. An annual self-assessment for 2022 has been conducted because of the introduction of the revised Code.  |
| **8.3** | Following each self-assessment, a landlord must:* report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members
* publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents
* include the self-assessment in their annual report section on complaints handling performance
 | Yes | This self-assessment will be reported to the September 2022 Board and published on our website. |