

Appendix 2: 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	The definition in the Housing Ombudsman Service Code is included in our complaints policy. A copy of our complaints policy can be found through the following link: Complaints policy West Kent	
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	Our complaints procedure states: <i>'A customer does not need to use the word "complaint" for us to treat it as one. Where an expression of dissatisfaction is made, we will ask the customer if they would like this investigated as a complaint.'</i> We have advised in our complaints policy about representatives making a complaint: <i>'We recognise that some people need additional support to be</i>	

			<i>able to complain. You can use an advocate or other third party to support you to complain or make a complaint on your behalf. This could be a representative organisation such as Age Concern or the Citizens Advice or a friend or family member.'</i>	
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>Our Complaints Policy sets out the difference between a service request and a complaint.</p> <p>A copy of our complaints policy can be found through the following link:</p> <p>Complaints policy West Kent</p> <p>Service requests are reported on our Housing Management System (Cx). We have stated in our complaints procedure that <i>'where a resident makes a service request, full notes of the conversation should be added to Cx'</i>.</p>	
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	Yes	<p>Our complaints policy and complaints procedure both state:</p> <p><i>'a complaint should be raised when a customer raises</i></p>	

	must not stop their efforts to address the service request if the resident complains.		<p><i>dissatisfaction with the response to a service request'</i></p> <p>We do not stop our efforts to address the service request when a complaint is made, as we know the importance of completing a service request in the resolution of the complaint.</p>	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>We work with Acuity, when conducting our Tenant Satisfaction Measures surveys and our transactional surveys sent to our residents.</p> <p>When completing the Tenant Satisfaction Measure surveys, we signpost residents to our complaints policy. Residents that express dissatisfaction in the transactional surveys, receive a call back from a Customer Resolution Officer to see how we can make things right and a decision can be made as to whether a complaint needs to be raised.</p> <p>We have a Resident Involvement team that seek wider feedback from residents and are aware of the need to provide details on</p>	

			the complaints process where necessary.	
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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	<p>We have expressly stated our exclusions in our complaints policy. A copy of our complaints policy can be found through the following link:</p> <p>Complaints policy West Kent</p> <p>Our complaints procedure states:</p> <p><i>'We will provide a written explanation to the customer within five working days if we do not accept their complaint or escalation.'</i></p>	
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:	Yes	As mentioned above, we have stated our exclusions in our complaints policy. These are considered to be fair and reasonable, but we review each case to determine if an exclusion applies.	

	<ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		We have introduced an amendment to our policy this year to remove some of our exclusions to allow greater access to the complaints process.	
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>Our complaints policy states that <i>we may not accept a complaint if it is made 12 months after the incident occurred, unless there are exceptional reasons</i> for doing so.</p> <p>The Customer Resolution team apply their discretion to accept complaints outside of the 12 months.</p>	
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	Yes	<p>Our complaints procedure states:</p> <p><i>'We will provide a written explanation to the customer within five working days if we do not accept their complaint or escalation. If the customer remains unhappy, they can access the external escalation</i></p>	

	fairly applied, the Ombudsman may tell the landlord to take on the complaint.		<i>route applicable to their circumstances. We will clearly explain the customer's escalation options to them.'</i>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Although we have included exclusions in our complaints policy, each complaint is considered individually.	

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	<p>We can receive complaints by telephone, email, post, in person or through the completion of an online form.</p> <p>If we are contacted on public social media pages, we will ask the person to contact us directly to protect their privacy.</p> <p>We have produced a video to provide guidance on the complaints process in a more accessible format. This video can be found on our website:</p> <p>https://www.westkent.org/about-us/contact-us/complaints-compliments-and-feedback/make-a-complaint</p> <p>We have also produced a hardcopy leaflet for those residents that may not have access to our website. We have</p>	

			these in our head office, as well as onsite in our older person schemes.	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	We have introduced an e-learning course on ' <i>Our Complaints Process</i> ', which is provided to all staff. All staff are able to raise a complaint case for the Customer Resolution team to review and investigate.	
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	We provide monthly reports to our Executive team that go beyond just the volume of complaints we receive. It gives a rounded view of the type of complaints we have closed, to identify trends in categories of complaint and timescales. We also provide quarterly reports to our Communities and Housing Committee, which now includes Equality, Diversity and Inclusion data to monitor whether our complaints process is accessible.	
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	Yes	Our complaints policy is published on our website and when it is opened up, there is the opportunity to use a 'read aloud' function or 'translate' function.	

	must also be published on the landlord's website.		<p>As mentioned at 3.1, we have produced a video to provide guidance on the complaints process, and we have also produced a hardcopy leaflet for those residents that may not have access to our website. We have these in our head office, as well as onsite in our older person schemes.</p> <p>We are able to offer interpretation and translation services for written documents, if requested.</p> <p>Our website has an Accessibility option, which gives the option of changing the contrast, text size or language.</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>We have explained how we publicise complaints information in our complaints policy. A copy of our policy can be found through this link:</p> <p>Complaints policy West Kent</p>	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<p>We do have a section in the complaints policy about a resident using an advocate or representative to pursue a complaint on their behalf.</p>	

3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>We have provided information about accessing the Housing Ombudsman Service in our complaints policy.</p> <p>Our website also advises a resident '<i>can contact the Housing Ombudsman Service directly</i>' for '<i>advice and guidance</i>' at any stage of their complaint.</p> <p>Information on the Housing Ombudsman service is also provided in our video and leaflet.</p>	
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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	<p>We have the Customer Resolution team that are responsible for managing complaints.</p> <p>A monthly report is produced for the Executive team, and a quarterly complaints report is considered by our Communities and Housing Committee.</p>	

4.2	<p>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.</p>	Yes	<p>Our Customer Resolution team have access to staff at all levels to facilitate the early resolution of complaints.</p> <p>The team have the authority and autonomy to engage with other departments to resolve disputes. We also have weekly meetings with the Heads of Service for any escalation of complaints across teams to ensure we address matters fairly.</p>	
4.3	<p>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</p>	Yes	<p>We have an e-learning module for all staff to understand the importance of complaints. Every month, our CEO has a meeting with all staff and lessons learnt from complaints are communicated to staff.</p> <p>We have a monthly learning meeting for Heads of Service to develop a culture of learning from complaints and prioritise improvements to our service.</p> <p>Our Customer Resolution team has four Customer Resolution Officers that are trained</p>	

			appropriately to handle complaints.	
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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	<p>We have a single complaints policy to explain how we will deal with complaints in accordance with the Housing Ombudsman Service code.</p> <p>Residents are not treated differently if they make a complaint.</p>	
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	<p>Our complaints policy and procedure state how we have a two-stage process for managing complaints.</p> <p>The policy can be found through the following link:</p> <p>Complaints policy West Kent</p>	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint	Yes	Our complaints policy and procedure reflects the two-stage process, in line with the Housing Ombudsman Service code.	

	process unduly long and delay access to the Ombudsman.			
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	We have a dedicated Customer Resolution team to respond to complaints on behalf of West Kent. Our contractors do not respond to complaints directly, so residents are not expected to pursue a complaint through a third party at stage one or stage two of the complaints process. Our complaints policy states that 'we will investigate complaints made about organisations that are providing services on our behalf, such as repair contractors'.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As mentioned at 5.4, we have a dedicated Customer Resolution team to respond to complaints on behalf of West Kent. Our contractors do not respond to complaints directly, so residents are not expected to pursue a complaint through a third party at stage one or stage two of the complaints process. Our complaints policy states that 'we will investigate complaints made about organisations that are providing services on our behalf, such as repair contractors'.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the	Yes	Each case will have an acknowledgement email or letter at both stages, which would be considered 'the complaint definition'. We have a template letter to assist the Customer Resolution team in ensuring we	

	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.		include our understanding of the complaint and the desired outcomes.	
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 aim to contact the complainant within 3 working days, so we can discuss their concerns in more detail. As mentioned above, each case will have an acknowledgement email or letter at both stages, which explains what we will include or what we exclude in line with our policy.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and 	Yes	<p>We have a dedicated and trained Customer Resolution team, who consider each complaint individually. They can act independently to other services at West Kent, as they are a separate team.</p> <p>We consider the complainants needs to ensure we give them a fair chance to have their complaint investigated fully.</p> <p>The complaint responses at stage one and stage two are reviewed by the Customer Resolution Manager. The relevant Heads of Service are also asked to review the stage two responses to ensure quality and fairness of the responses.</p>	

	d. consider all relevant information and evidence carefully.		Our case management system allows us to mark cases as private to the Customer Resolution team to ensure matters are treated confidentially when necessary.	
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	<p>We have explained the actions we take if a complaint will fall outside the timescales set out by the Housing Ombudsman Service in our complaints policy. A copy of our policy can be found through this link:</p> <p>Complaints policy West Kent</p>	
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.</p> <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>	Yes	<p>Our complaints procedure states:</p> <p><i>'We will ensure that we make reasonable adjustments for customers to enable them to participate in the complaints process. We will check a complainant's customer record for details of any disability, medical condition, or other communication need. We will discuss with the customer whether they have any additional needs, or needs that we have not yet recorded, that we need to take account of during our complaint investigation and agree with them what adjustments we can make.'</i></p> <p>All members of staff have been required to complete new Dignity and Respect training, in addition to our existing Equality, Diversity, and Inclusion training. The training provide guidance on how staff can record any reasonable adjustments on our housing management system.</p>	

			We have introduced a Vulnerability policy that discusses how we manage reasonable adjustments for our residents.	
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	<p>Reasons for refusal to escalate a complaint are detailed in our complaints policy and are communicated clearly to the resident when applicable.</p> <p>A copy of our policy can be found through this link:</p> <p>Complaints policy West Kent</p>	
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	Cases and communications are recorded on our housing management system. Copies of any correspondence or reports, including our complaint responses, are filed on our housing management system or securely filed in SharePoint.	

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	The Customer Resolution team have authority to seek resolution at any stage through appropriate remedies in line with Housing Ombudsman Service guidelines.	
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	Our complaints policy and procedure make reference to how we manage unreasonable behaviour. We have a policy for unacceptable behaviour, which provides more information and can be found on our website: https://www.westkent.org/media/k2ejclu1/unacceptable-behaviour-policy-updated-nov-24-for-website.pdf	
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	Our Unacceptable Behaviour policy states: <i>'We respect and value the differences of our customers and staff and we will treat everyone we work with fairly, and with respect. This policy has been considered in light of our equality and diversity policy and is compliant with its principles. We recognise that some disabilities and health issues may make it difficult for customers to appreciate the impact that their behaviour</i>	

			<i>may have on themselves, staff and other customers. Where we are aware that a customer is vulnerable, disabled or has particular needs, staff will make reasonable adjustment to meet their needs.'</i>	
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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	<p>Our Customer Resolution team are aware of the timescales referenced within the Housing Ombudsman Service Code.</p> <p>We report on complaint timescales and we have seen an improvement in responding to complaints within the initial timescales between April 2024 and March 2025.</p> <p>We are aware of the importance of an early resolution to rebuild trust with our residents.</p>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	We have referred to this requirement in our complaints policy and complaints procedure.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	We have referred to this requirement in our complaints policy and complaints procedure.	

	<u>days</u> of the complaint being acknowledged.			
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	We have referred to this requirement in our complaints policy and complaints procedure.	
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	Our complaints policy states: <i>'In exceptional circumstances we may need to extend your complaints further. We will seek your agreement should this be needed and agree a timescale for further contact. We will also provide you with the details of the Housing Ombudsman Service should you wish to take further advice from them.'</i>	
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	Yes	Our complaints procedure states: <i>'We will close all complaints at the earliest opportunity once the answer to the complaint is known. Outstanding actions will</i>	

	actioned promptly with appropriate updates provided to the resident.		<i>be completed promptly, and they will be tracked and monitored by the business area responsible for the item and overseen by the Customer Resolution team. The business area will also be responsible for providing appropriate updates to the residents.'</i>	
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	Our Customer Resolution team understand the need to address all points raised by the complaint in their response letter. Where relevant, we consider policies, legislation and the terms of the tenancy agreement to support the reasons for our decisions provided to the complainant.	
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	<p>If issues are raised that relate to the existing complaint, we will try to include them in the complaint response if we have sufficient time to investigate them fully and it would be reasonable to respond.</p> <p>Our Complaints procedure states for stage two cases:</p>	

			<i>'New issues raised at this stage may be treated as a new and separate complaint and investigated at stage one'.</i>	
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	<p>We have a complaint response template to assist in ensuring we include all of the points in our responses.</p> <p>Our complaint responses are reviewed by the Customer Resolution Manager to ensure they are in line with the Housing Ombudsman Service code requirements.</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	We have referred to this requirement in our complaints policy and complaints procedure.	

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	We have referred to this requirement in our complaints policy and complaints procedure.	
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	<p>We are aware that residents do not have to explain their reasons for requesting a stage two escalation.</p> <p>We have referred to this requirement in our complaints policy and complaints procedure.</p>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>Our complaints procedure states:</p> <p><i>'Another member of the customer resolution team will carry out an independent review of the stage one response.'</i></p>	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	We have referred to this requirement in our complaints policy and complaints procedure.	
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	Yes	We have referred to this requirement in our complaints policy and complaints procedure.	

	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.			
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	We have referred to this requirement in our complaints policy and complaints procedure.	
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	Our complaints procedure states: 'We will close all complaints at the earliest opportunity once the answer to the complaint is known. Outstanding actions will be completed promptly, and they will be tracked and monitored by the business area responsible for the item and overseen by the Customer Resolution team. The business area will also be responsible for providing appropriate updates to the residents.'	
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	Our Customer Resolution team understand the need to address all points raised by the complaint in their response letter. Where relevant, we consider policies, legislation and the terms of the tenancy agreement to support	

			the reasons for our decisions provided to the complainant.	
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 g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>Our Customer Resolution team are aware of the requirements for stage two letters and training has been provided on the requirements to the team.</p> <p>Our complaint responses are reviewed by the Customer Resolution Manager to ensure they are in line with the Housing Ombudsman Service code requirements.</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	Stage 2 responses are reviewed by relevant operational Heads of Service.	

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	Yes	Our Customer Resolution team are aware of the requirements and our actions to put things	

	<p>intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		right are visible in our complaints responses.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We have referred to this requirement in our compensation procedure.	
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	Our response letters set out the remedies and we have a system in place for tracking actions to completion.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We have a Compensation Procedure, which sets out levels of compensation in line with the HOS recommended levels.	

			We review published reports by the Housing Ombudsman Service to incorporate learning and good practice.	
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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> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>The evidence will be provided with the self-assessment to the Housing Ombudsman Service. This will include our annual complaints handling and service report from April 2024 to March 2025, details and learning from maladministration findings and the Annual Report from the Ombudsman for 2024-25.</p>	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	We are aware of this requirement and all information will be published on our website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We are aware of this requirement, but have not had any significant restructure or merger.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We are aware of this requirement, but have not been asked to update the self-assessment this year.	
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	We are aware of this requirement.	

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	<p>We have a lessons learned approach, which looks more widely at changes we need to make to a process or the way we work.</p> <p>Lessons learned are reported to the Communities & Housing Committee.</p> <p>Learning from complaints is evidenced in our annual complaints and service improvement report.</p>	
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	<p>Learning is central to creating a positive complaint handling culture.</p> <p>Information on complaint handling is published to our resident scrutiny panel to try and introduce positive change. Monthly Customer Contact reports are provided to the Executive Team, which includes complaint handling.</p>	

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	Information on learning is reported in our Annual Complaints and Service Improvement report, as well as quarterly to our resident scrutiny panel, Communities & Housing Committee and the Executive team.	
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	The Executive Director of Housing and Communities is the person accountable.	
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	This is set out in the complaints policy, as Chair of the West Kent Board.	
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	Yes	We report to the Communities & Housing Committee quarterly, and annually to the Board.	

	<p>person must have access to suitable information and staff to perform this role and report on their findings.</p>		<p>We include any relevant information from the Housing Ombudsman Service, including all of the determinations and the outcomes from their investigations. Housing Ombudsman Service cases are also reported quarterly to the Board in the Chief Executive's update.</p> <p>Any maladministration findings will be reported immediately to the Board Chair.</p> <p>.</p>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and 	Yes	<p>Annual reports are sent to the Board, and quarterly reports to the Communities and Housing Committee.</p>	

	d. annual complaints performance and service improvement report.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	An objective has been set for all resident facing staff in their Personal Development Review for 2025/26.	