

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

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’</i>	Yes	<u>Corporate Complaints Procedure</u> (wigan.gov.uk)
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	Covered by our complaints procedure.
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	Covered by our complaints procedure.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Covered by our complaints procedure.

<p>1.8</p>	<p>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.</p>	<p>Yes</p>	<p>If you report a fault that needs rectifying, this will be dealt with as a service request rather than a complaint. We also have an “Unreasonable Complaints” section within our Complaints Policy. Complaints will always be accepted if a resident has expressed dissatisfaction, however there are occasion where faults will be dealt with informally and actions are agreed verbally and logged on the system.</p> <p>Details of exclusions are included within the Unreasonable Complaints section and a full investigation will take place to determine whether or not a complaint is unreasonable. Other examples may be that an issue is being dealt with outside of the complaints process, such as a legal matter/ proceedings.</p> <p>Some services have specific procedures governing complaints and appeals. Whilst not dealt with under our corporate complaints procedure, they will follow the same principles of transparency and fairness.</p> <p>If a complaint falls into one of these categories, we will tell the resident, and let them know how it will be dealt with. The main complaint types that would be dealt with under other procedures are:</p> <ul style="list-style-type: none"> • an appeal against refusal of planning permission • complaints that fall within other statutory complaint procedures (e.g., care services or child protection) • a school admission or exclusion appeal • complaints about Councillors • a complaint from a member of council staff about a personnel matter
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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 that decision to the Ombudsman.	Yes	<p>Complaints procedure states.....</p> <p>Some services have specific procedures governing complaints and appeals. Whilst not dealt with under our complaints procedure, they will follow the same principles of transparency and fairness. If your complaint falls into one of these categories we will tell you, and let you know how it will be dealt with.</p> <p>The main complaint types that would be dealt with under other procedures are:</p> <ul style="list-style-type: none"> • an appeal against refusal of planning permission • complaints that fall within other statutory complaint procedures (eg care services or child protection) • a school admission or exclusion appeal • complaints about Councillors 3 • a complaint from a member of council staff about a personnel matter
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.4	Landlords should recognise the difference between a 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.	Yes	<p>This is covered by our complaints procedure.</p> <p><i>We are looking at how we incorporate training on complaint handling into our wider work on culture and the tenant voice.</i></p>
1.5	Survey feedback may not necessarily need to be 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.	Yes	<p><i>Whilst expressions of dissatisfaction within some survey responses are followed up, we will look to formalise how we make people aware of the complaints procedure, when we review our survey approach in 2022/23.</i></p>

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

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 of the potential channels, there must be more than one route of access into the complaints system.	Yes	The complaints process ensures complaints are accepted from complainants in all formats.
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	This is published on our website. <i>We know we have more work to do on ensuring this information is clear and consistent, and plan to work with tenants on this.</i>
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	The policy is on the website: <u>Council homes complaints</u> Complaints policy isn't on the Council homes complaints page, so needs to be added. <i>We will be reviewing this information as part of a wider review of our website.</i>
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 to deal with such requests.	Yes	The procedure sets out how we will respond to reasonable adjustments. Staff handling complaints are trained to make these adjustments, when required. Mandatory equality and diversity training is provided to new staff. Complaints procedure states.....We are committed to making it easy for anyone who is unhappy with a service, or experience provided by the Council, to tell us about it. By giving us your views, you can help us to improve our services.

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 with residents.	Yes	This is published on the website and details of the Ombudsman scheme are included in individual responses. As part of wider work on communication and engagement, we will consider other ways to publicise.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This is included within complaint response letters and published on the website: <u>Council homes complaints</u>
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	This is included within complaint response letters and on the website. <u>Council homes complaints</u>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.2	Where a landlord has set up channels to communicate 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.	Yes	Our Customer Services and PR teams will identify any complaints made through our social media channels and either pass the details to the relevant complaints team or signpost the complainant on how to log their complaint online if they wish to complete the full details themselves. We can make this process clearer by adding reference to social media channels into the 'How to make a complaint' section of the complaints procedure as evidence. We are looking at launching a housing specific Facebook page for our residents and will ensure processes are in place in relation to complaints.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

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 "complaints officer".	Yes	Housing Customer Care Team pick up and handle any complaints in relation to the repairs service. The Corporate Complaints Team pick up all other complaints and ensure these are passed to the relevant service and the complaints manager leading that team. Where complaints cross a number of services, the Corporate Team will identify the lead service and pass the complaint to them. They will then coordinate complaint handling between themselves and other relevant teams.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Representatives are attending a national complaints training course on 19.10.22 and will roll out any learning.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with 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. 	Yes	Representatives are attending a national complaints training course on 19.10.22 and will roll out any learning. Further evidence provided within Complaints Training Guidance March 2021. QA to be built into new JADU complaints system. Regular performance reviews are conducted with the Corporate Complaints Team, these include listening to calls received via the complaints line and scoring against the call quality monitoring standards.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

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 within five days of receipt .	Yes	Although we do endeavour to resolve issues for residents at the first opportunity, where we receive a complaint, it is logged as a stage 1 complaint and acknowledged within 5 days. We are planning to use the new JADU system to manage acknowledgements and communications with complainants.
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 both parties.	Yes	This is covered within individual acknowledgements. We will ensure all this information and clarification is included in acknowledgement letters on the new JADU system, once it is fully set up.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints procedure states... We will carry out impartial and confidential investigations.
4.7	The complaint handler must: <ul style="list-style-type: none"> • 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	Complaints procedure states..... <ul style="list-style-type: none"> • Your complaint will be received positively, however you make it • We will carry out impartial and confidential investigations • We will make sure that our staff are trained to handle complaints effectively and will try to deal with your complaint at the first point of contact where we can • When we have got it wrong, we will apologise and put things right where we can • We will respond to your complaint within the timescales outlined below

			<ul style="list-style-type: none"> • We will keep you updated on progress, and tell you what will happen next • We will tell you how we make our decisions • We will learn from what you tell us and use your feedback to improve our services <p>As part of our planned review of tenant engagement, which will run in 2022/23, we will be looking at how we can work with residents to assure the quality of our complaints handling and responses. This could include mystery shoppers and the readers' panel.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>On individual complaints, how residents will be kept informed is communicated.</p> <p>As part of our tenant engagement review, we will be refreshing our housing service standards, including those around how we respond to complaints.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>Opportunity to comment on outcome at stage 1 and request escalation to stage 2 if unsatisfied with findings before proceeding to Ombudsman.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>In complaints policy and covered within stage 1 responses.</p>

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. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Unreasonable/persistent complaints procedure attached (internal doc).
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 with other parties and any reports or surveys prepared.	Yes	Currently using customer folders and spreadsheet for corporate complaints. JADU not being used as yet, as still in development stages. Repairs team also use housing management information system to record complaints.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Wording in complaints procedure and full unreasonable complainant procedure attached to email.

Best practice 'should' requirements

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 have published housing service standards, but we also manage the expectations of individuals when responding to their complaints. One example relates to complaints made in relation to time on the housing waiting – we provide information on the bidding system and are developing a housing options pathway, which we can direct residents to. If a desired outcome is unreasonable or unrealistic, then this will be explained to an individual complainant.

4.4	A complaint should be resolved at the earliest possible 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.	Yes	Complaints will be resolved as soon as possible, and any immediate actions will be carried out, rather than wait until the full completion of the complaint process. We will keep a complainant informed where their complaint will take longer due to the nature of the issues.
4.5	Landlords should 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 where this is reasonable.	Yes	This is covered by the policy. Review published information to ensure this is clear – look at both corporate and housing pages.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This will be included within individual responses, when relevant.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Complaint responses comply with this requirement.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Telephone calls/letters/emails/visits are all used to keep complainants updated on the progress of their complaint.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	No	We are currently reviewing our tenant feedback processes, including surveys, and will be incorporating a process for gauging feedback on complaints. We are also looking at how tenants are involved in quality assurance of our service delivery, and this can include complaints handling.
4.17	Landlords should recognise the impact that being 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	Yes	Listening to feedback is part of our Deal culture. We will involve our teams in our positive work on tenant voice and learning from complaints, as part of our wider culture work in 2022/23.

4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Unreasonable complainants policy states..... Before any decision is made to warn a complainant or to designate a person as an unreasonable /unreasonably persistent complainant, they shall be informed of the fact in writing by the appropriate Assistant Director. The person concerned will then be given 10 days in which to comment in writing before the final decision is made. Should the person exercise their right to comment on this decision, there will then be a review by a senior officer not previously involved to consider the merits of any decision to limit contact. This should take account of the views of the person affected and should take place before referral to the Local Government Ombudsman.
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Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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 should not exceed a further 10 days without good reason.	Yes	Insert link to procedure. <u>Website - complaints</u>
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	Responses are sent as the complaint handling process is completed, rather than when actions are finalised. We will complete immediate actions as soon as possible and will further communicate with the complainant if there are any follow up actions to be completed.

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	Individual complaint response detail clear reasons for any decisions made and the detail of the investigation process that led to that response. At a recent away day with our Housing Advisory Panel tenant representatives, we identified that we would like to make further improvements to the way we set out complaint responses.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • 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	Individual complaint written responses include all this information. However, at a recent away day with our Housing Advisory Panel tenant representatives, we identified that we would like to make further improvements to the way we set out complaint responses.

Stage 2

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 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.	Yes	Stage 1 response complaint letters will provide details of how to escalate a complaint to Stage 2.

5.10	On receipt of the escalation request, landlords must set out their 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.	Yes	<p>Complaints procedure states..... We need to know which part of the complaint you feel wasn't handled well, and what action you would like to be taken. Stage 2 complaints will be investigated by an independent Senior Officer appointed by the Chief Executive, who will review how your complaint was dealt with originally to decide if:</p> <ul style="list-style-type: none"> • The complaint was investigated thoroughly, objectively and honestly • The conclusions reached are based on evidence obtained • The response was reasonable, appropriate and tried to achieve resolution <p>You may be contacted during the review to confirm any details or to discuss your complaint further.</p> <p>At the end of the investigation, and within 15 working days of receipt of your request, the Senior Officer will write to you with the outcome of the investigation and any actions resulting from it. The response will advise you how to contact the Local Government Ombudsman if you are still unhappy.</p>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	<p><u>Corporate Complaints Procedure (wigan.gov.uk)</u></p>
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Our Internal Auditors consider complaints at Stage 2.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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.	Yes	Our Stage 2 timescale is 15 working days as per complaints procedure.

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • 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 <p>and</p> <ul style="list-style-type: none"> • 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. 	Yes	<p>Individual complaint written responses include all this information. However, at a recent away day with our Housing Advisory Panel tenant representatives, we identified that we would like to make further improvements to the way we set out complaint responses.</p> <p>We do not have Stage 3, and Stage 2 responses advise on the Housing Ombudsman.</p>
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	<p>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. A process with more than three stages is not acceptable under any circumstances.</p>	N/a	
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • 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

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 landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Complainants are always kept informed on progress of their complaint.
5.3	Where agreement over an extension period cannot be reached, 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.	Yes	We have no examples of this, but we will take this step if the situation arises.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Service teams are able to identify recurring issues due to their background of the housing service. In the future we will be looking at how we use JADU system reports to flag complaint trends.
5.7	Where residents raise additional complaints during the 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.	Yes	Regular communication during the complaint handling process means that any issues can be considered at the same time.

Stage 2

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 landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Complainants are always kept informed on progress of their complaint.
5.15	Where agreement over an extension period cannot be reached, 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	Yes	We have no examples of this, but we will take this step if the situation arises.

Stage 3

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 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 <u>within 20 working days</u> 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.	N/a	
5.19	Where agreement over an extension period cannot be reached, 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.	N/a	

Section 6 - Putting things right

Mandatory 'must' requirements

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 has already taken, or intends to take, to put things right.	Yes	This is covered within complaints responses. <i>We are working with tenants to look at how we can improve our responses to complaints, to ensure any written responses to tenants are clear on the outcome and action to be taken.</i>
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 or would cause unfairness to other residents.	Yes	Remedies to individual complaints will be relevant to the issues raised and the impact of any failures. Where appropriate, this can include ex gratia payments, particularly if the impact to the tenant relates to damage or long delays.
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	This is included within complaints responses. JADU system will support tracking remedies through to completion.
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 to as well as any distress and inconvenience caused.	Yes	Services work closely with colleagues within the Legal Department and with the Insurance Team, including on complaints arising in relation to disrepair.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	<p>Services do use complaints to identify learning and make improvements to the way services are delivered to tenants. This is a manual process at the moment, completing corrective action forms.</p> <p>The new JADU system will support reporting, once fully implemented, and enable wider learning.</p> <p>Formal reporting planned from 2023 on trends and learning through the housing governance structure will also facilitate greater learning.</p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Services work closely with colleagues within the Legal Department, in agreeing resolutions.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

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 scrutiny panels.	Yes	Information on complaints trends and some learning is included within the Tenant Annual Report. We have plans to review how we use learning from complaints and report to residents, staff, and Housing Advisory Panel, which will be developed and implemented in 2023.

Best practice 'should' requirements

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 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.	No	An away day with Housing Advisory Panel is scheduled to explore the roles of tenant representatives. The potential to have a complaints lead will be picked up as part of this work.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> 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. 	No	We have plans to review how we use learning from complaints and report to residents, staff, and Housing Advisory Panel, which will be developed and implemented in 2023. The report of the Ombudsman can be included within this. Some information on trends is already reported to residents and Housing Advisory Panel members, via the joint work on the Tenant Annual Report. Tenant Scrutiny Panel have previously reviewed complaints processes.

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	<p>Complaints are used within teams to support service improvements.</p> <p>We have plans to review how we use learning from complaints and report our housing governance structure on trends. This learning will feed into training and improvements in a more formal way.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • 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. 	Yes	<p>Welcoming feedback on our services is part of Wigan Council's Deal with its residents. Staff undertake training on the Deal and associated behaviours.</p> <p>We are currently undertaking a major piece of work on our culture, building on national priorities on the tenant voice and tackling stigma. We will incorporate complaint handling into this culture work.</p>

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

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 its requirements.	Yes	Annual self-assessments and reporting through Housing Advisory Panel have been incorporated into our governance forward plan.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The current self-assessment takes account of recent changes in how housing functions are structured within the council. The change in structure has not impacted on complaints procedures.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> 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	<p>The outcome of this self-assessment has been reported through our Housing Advisory Panel on 27th September 2022. The governance forward plan will include annual reporting.</p> <p>This self-assessment is published on our website, with a link included within the Tenant Annual Report. Future annual reports will reflect on the self-assessment in more detail.</p>