

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Reference documents:

1. Training slides – Jadu and on the new code:



2. Redress Policy (draft):



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	New Council Complaints Policy - Corporate Complaints Policy (wigan.gov.uk)	Policy was updated March 2024. Definition in policy: <i>A complaint is 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 a group of individuals or residents.</i>
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	Amended complaints policy makes this clearer – Corporate Complaints Policy (wigan.gov.uk)	The policy states: <i>You can make a complaint to us in whichever way is easiest for you. This policy applies to any customer of the council, or a person or body acting on behalf of the council.</i> <i>A customer of the council is anyone who:</i> <ul style="list-style-type: none"> • is receiving or seeking to receive a service from the Council or its contractors • is acting on behalf of an individual or group of individuals

				<p><i>We are committed to improving accessibility for everyone when accessing any of our services. We will ensure you are able to access support to make a complaint or provide the opportunity for you to confirm that you have given consent for a representative to act on your behalf.</i></p>
1.4	<p>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.</p>	Yes	<p>New policy – Corporate Complaints Policy (wigan.gov.uk) Reflected in Jadu – system guidance</p>	<p>The new policy sets out definition for Service Requests: <i>A service request is a request from a customer requiring action to be taken to put something right. Service requests are not complaints, but they are recorded, monitored and reviewed regularly.</i></p> <p>The new JADU system reaffirms the classification of compliant and service request. Detailed guidance is available to all staff on intranet: Complaints.</p> <p>Initial training on Jadu and the new code set this out also.</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 must not stop their efforts to address the service request if the resident complains.	Yes	<p>New policy – Corporate Complaints Policy (wigan.gov.uk)</p> <p>Jadu system roll-out training included this.</p>	<p>Policy states: <i>We will investigate your complaint and the outcomes you are seeking, and always aim to resolve your complaint to your satisfaction. We will listen and understand your concerns, allowing you time to fully explain your circumstances. We will ensure that our approach to complaint handling reflects the need to:</i> <ul style="list-style-type: none"> <i>• have a collaborative and cooperative approach towards resolving complaints</i> <i>• take collective responsibility for any shortfalls identified through complaints</i> <i>• act within the professional standards for engaging with complaints as set by any relevant professional body.</i> </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	No	In the first round of TSM some references to complaints were made. However, this could be made clearer.	<p>Action: Improvements to be made for 2024 surveys and on website promotion pages.</p> <p>Target date to be compliant: September 2024</p>

	their services, they also must provide details of how residents can complain.			
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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	Clear in new policy Corporate Complaints Policy (wigan.gov.uk)	Clear parameters set out in new policy (pp. 3-4).
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <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. 	Yes	Clear in new policy Corporate Complaints Policy (wigan.gov.uk)	As above. Clear parameters set out in new policy (pp. 3-4).

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>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>There is discretion outside of the time limit.</p>	<p>Policy states: <i>Complaints must be made not later than twelve months from the date on which the issue(s), which is the subject of the complaint, occurred or twelve months from the date on which the issue(s) came to the notice of the complainant. However, if there is a valid reason why the complainant did not or could not make the complaint within the timescale, or if there is a reasonable possibility for the complaint to be effectively and meaningfully investigated then it should be investigated and responded to.</i></p> <p>This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training.</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	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p>	<p>Under policy section 'complaints that cannot be dealt with under this procedure' (p.5) it states:</p> <p><i>If your complaint falls into one of these categories we will tell</i></p>

	not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			<i>you, and let you know how it will be dealt with</i>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'our promise' section of the policy (p.6).

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	In new policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	<p>Policy states:</p> <p><i>We will make reasonable adjustments for customers where appropriate under the Equality Act 2010. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities that have been disclosed. Any agreed reasonable adjustments will be kept under active review.</i></p> <p>This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training.</p>
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	In new policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	<p>Covered by definition in new policy as covered in earlier sections.</p> <p>There has been a series of staff communications about the new complaints codes and policy. This was also</p>

				covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Website updates to the complaints pages.</p> <p>Tenant handbook</p>	<p>Policy states:</p> <p><i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</i></p> <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. 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> <p>This was also covered in complaints code and Jadu</p>

				initial training and will be covered by ongoing complaint handling training.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	<p>The complaints process ensures complaints are accepted from complainants in all formats.</p> <p>Online accessibility is completed for all published information. PDF functions for Read Aloud and Translate Reasonable adjustments are made available, staff are aware of this.</p> <p>There is help available at customer facing offices such as the Life Centre/Contact Centre that can offer support accessing different versions.</p> <p>Action: The Readers Panel to review the latest policy update for accessibility.</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	New policy - Corporate Complaints Policy (wigan.gov.uk)	<p>This is published on our website, information about the policy is also included in social media posts and tenant engagement communications.</p> <p>Action: Publication and promotion of the policy to be made more explicit within the policy.</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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	<p>This is covered by the policy which states:</p> <p><i>You can make a complaint to us in whichever way is easiest for you. This policy applies to any customer of the council, or a person or body acting on behalf of the customer.</i></p> <p><i>A customer of the council is anyone who:</i></p> <ul style="list-style-type: none"> <i>• is receiving or seeking to receive a service from the Council or its contractors</i> <i>• is acting on behalf of an individual or group of individuals 6.</i> <p><i>We are committed to improving accessibility for everyone when accessing any of our services. We will ensure</i></p>

				<p><i>you are able to access support to make a complaint or provide the opportunity for you to confirm that you have given consent for a representative to act on your behalf.</i></p> <p>This is also set out in correspondence. Staff have been made aware of this.</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>Policy now makes this clearer - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Templates and processes reflect this also.</p>	Set out on p.10 of Complaints Policy.

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>In accordance with the codes, we have a lead officer who oversees the complaint process and a lead member who are updated on complaint performance and trends.</p> <p>New governance overseen by:</p> <ul style="list-style-type: none"> • Assistant Director for Customer Experience and Support • Assistant Director for Housing <p>Corporate Complaints Policy (wigan.gov.uk)</p>	<p>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.</p> <p>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.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Jadu system enables centralised case recording.	New policy and Wigan Council's Deal behaviours for staff provide empowerment for staff to act to resolve complaints.

				<p>Quality Assurance function has been 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.</p> <p>The complaints teams have access to staff at all levels and that stage 2 reviews are carried out by an independent officer.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaint training on the new policy and Jadu system has been carried out.	<p>This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training.</p> <p>New complaint handling training is being developed.</p> <p>To adequately resource complaint handling there has been an increase in staff resource within the Customer Care Team.</p>

				<p>Furthermore, there has been additional capacity provided to develop and implement the new JADU system.</p> <p>There has been a series of staff communications about the new complaints codes and policy.</p>
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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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	In place.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the new policy clearly. The initial training for staff also covered these aspects.

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Compliant but recognise that there is more that we can do to improve customer experience.	Action: There is work planned to increase awareness with third party contractors and to review the case recording and communication systems that are in place.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	In policy and in the templates. In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the new policy clearly. The initial training for staff also covered these aspects.

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	In new policy - Corporate Complaints Policy (wigan.gov.uk) and in the templates. Jadu supports ID of complaint issues and service requests	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	<ul style="list-style-type: none"> • Jadu training • Quality Assurance Programme • Complaints Quality Assurance system • Complaints survey findings 	<p>Set out in the new policy clearly. The policy states:</p> <p><i>A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</i></p> <p>And in 'our promise' section of the policy (p.6).</p> <p>The initial training for staff also covered these aspects.</p> <p>Action: Keep the quality assistance action plan for housing teams under review.</p>

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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'time-scales' section of the new policy (p.7).
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Jadu system allows for reasonable adjustments to be recorded. Although compliant there is more to do to facilitate cross system data sharing to ensure that these are kept under review and applied in all interactions between the individual and the Council.</p>	<p>The Jadu system has functionality to record required reasonable adjustments.</p> <p>This information is also collected when asking for preferred method of contact and any other relevant information.</p> <p>Action: Review how to extract reasonable adjustments information from Jadu and apply to wider records i.e., Council's housing HMIS system.</p> <p>Action: establish regular monitoring processes.</p> <p>Action: Align to the vulnerability project and</p>

				IT/Joint Intelligence Unit data warehouse.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the 'Complaints Procedure' section of the policy (p.8)
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	In new policy - Corporate Complaints Policy (wigan.gov.uk) Jadu system case recording	Jadu allows this but there are improvements to be made for third party correspondence. Action: There is work planned to increase awareness with third party contractors and to review the care recording and communication systems that are in place.
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	In new complaints policy - Corporate Complaints Policy (wigan.gov.uk) In new redress policy	Set out in the 'remedies' section of the Policy (p.10). Action: Review of processes underpinning ne Redress Policy.

				Action: Redress Policy to go to Full Council for approval – July 24.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	<p>Under section 'Unreasonable Complainant Behaviour' in complaints policy (p.12).</p> <p>Restrictions are recorded by the Corporate Complaints Team and reviewed as needed.</p> <p>Action: Review of restrictions to be undertaken and recorded routinely.</p>
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	<p>Under section 'Restricting access to Council services' in the complaints Policy (p.13)</p> <p>All staff are trained on the Equality Act.</p>

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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out on pp.6-8 of the policy.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk) and website. New Jadu monitoring reports.	Set out on pp.6-8 of the policy. The initial training for staff also covered these aspects.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk) Details also set out on website. Jadu monitoring reports.	We monitor our performance to ensure we comply with the timescales. JADU will enable quicker allocation of complaints in the future, as well as monitoring of target dates, so we expect to see
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	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	

	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.			performance improve in 2024/25/
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Stipulated under section 'Housing Ombudsman Service' of the complaints policy (p.11).
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk) Jadu allows tracking of corrective action and pulls through to dashboard.	Set out in the new policy. The initial training for staff also covered these aspects.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk) Jadu process / templates	Action: Continue to develop quality assurance processes, including tenant voice.
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	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Case examples available

	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.			
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Jadu templates</p>	<p>This is now included in complaints correspondence. Staff have received initial training on this.</p> <p>Going forward, this will be included in ongoing complaints handling training.</p> <p>We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role.</p> <p>Action: finalise quality assurance workplan with HAP representative.</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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the complaints policy under section 'The Complaints Procedure' (p.8)
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	The initial training for staff also covered these aspects.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	We monitor our performance to ensure we comply with the timescales. JADU will enable quicker allocation of complaints in the future, as well as monitoring of target dates, so we expect to see performance improve in 2024/25/
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Stage 2 complaints will be investigated by an independent Officer appointed by the Chief Executive
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk)	

	complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Stipulated under section 'Housing Ombudsman Service' of the complaints policy (p.11).
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	In new policy - Corporate Complaints Policy (wigan.gov.uk) Jadu function for recording corrective actions and providing reports.	Set out in the new policy. The initial training for staff also covered these aspects.
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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'service standards' section of the policy (p.7)
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint;	Yes	In new policy - Corporate Complaints Policy (wigan.gov.uk) And templates	Set out in 'Formal Complaint - Stage 2' of the policy (p.9) This is also now included in complaints correspondence.

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			<p>Staff have received initial training on this.</p> <p>Going forward, this will be included in ongoing complaints handling training.</p> <p>We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role.</p> <p>Action: finalise quality assurance workplan with HAP representative.</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	In new policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'Formal Complaint - Stage 2' of the policy (p.9)

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. 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. 	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>In new redress policy</p>	<p>Set out in the 'Remedies' section of the complaints policy (p.10)</p> <p>Also covered by the new Redress Policy that has been approved by Cabinet.</p> <p>This is also now included in complaints correspondence. Staff have received initial training on this.</p> <p>Action: Review of processes underpinning the Redress Policy.</p> <p>Action: finalise quality assurance workplan with HAP representative.</p> <p>Action: Redress Policy to go to Full Council for approval – July 24.</p>

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>In new redress policy</p>	<p>This is set out in 'redress' section of the complaints policy (p.10) and in the new Redress Policy.</p> <p>Quality Assurance function has also been 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.</p>
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		
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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;	Yes	<ul style="list-style-type: none"> • 2024 complaints self-assessment and report. • Tenant annual report and KPI reports • Annual reports will be taken to Council cabinet and quarterly reports will go to Housing Advisory Panel and Senior Management Team. 	<p>Existing mechanisms in place to produce annual performance and improvement reports under the old code. These have been published online.</p> <p>These have been strengthened to take account of the requirements of the new codes and will also be published online.</p> <p>We have worked with tenants to agree content and format for the annual tenant reports. Once approved, these will be sent to all tenants and published online.</p> <p>A - 2024 self-assessment completed.</p> <p>B – The new Jadu system has improved the reporting functionality. However, there is more development needed to fully capture refused complaints.</p> <p>C – We can evidence action taken in response to non-compliance determinations by the Ombudsman.</p> <p>D – Jadu has provided robust ability to capture improvements made resulting from complaints. Furthermore, governance and quality assurance processes have been strengthened to report themes and changes as a result.</p>

	<p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			<p>E – In the event of receiving an annual report from the Ombudsman, findings and recommendations will be actioned and reported to both the Ombudsman and through the Council's governance structure to ensure learning is applied.</p> <p>More information on our performance can be found at: https://www.wigan.gov.uk/Resident/Housing/Council-homes/About-us/Performance.aspx</p> <p>Action: develop integrated reporting to assess refused complaints.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes	<p>Previously this has been reported to the Housing Advisory Panel (June and September 2023 latest) and published online.</p> <p>Going forward Annual reports will be taken to Council cabinet and quarterly reports will go to Housing Advisory Panel and Senior Management Team.</p>	<p>The annual complaints report will be reported to Housing Advisory Panel and Cabinet.</p> <p>The decision of Housing Advisory Panel and Cabinet in reviewing the annual complaints report will be published on the council's website.</p> <p>Action: Consider developing half yearly report.</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This self-assessment is timely as it follows a significant review of the Complaints policy and development of a new Redress policy.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted.	Governance is in place to respond accordingly.
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		

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>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Tenant annual report</p> <p>New complaints report</p> <p>Development day programmes</p>	Set out in the complaints policy under section 'Learning from complaints and customer engagement' (p.20)
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>Tenant focus group held to shape content for performance reporting and annual report content – ensuring transparency.</p> <p>Housing Service Manager Away day held to review complaints, develop quality assurance and promote awareness across services of requirements and positive complaints culture.</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		<p>Individual team meetings are being held to further embed positive complaints culture.</p> <p>Wigan Council has a learning culture within the organisation. Revised governance and reporting</p>

				<p>processes have been put in place to ensure learning from complaints is embedded. However, there is some scope for improvement.</p> <p>Action: Keep the quality assurance action plan for housing teams under review.</p>
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	<p>Assistant Director for Customer Experience and Support</p> <p>Assistant Director for Housing</p>	Completed as part of governance review.
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	Portfolio Holder has been identified and will be confirmed following the 2024 general election.	We also have Housing Advisory Panel tenant representative to lead on complaints.

9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	<p>New governance in place:</p> <ul style="list-style-type: none"> Quarterly corporate reports to Strategic Management Team and Housing Advisory Panel. Annual report to go to Cabinet 	With Jadu there is functionality to facilitate robust regular reporting into Housing Advisory Panel, Strategic Management Team and Cabinet on housing specific complaints.
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 d. annual complaints performance and service improvement report. 	Yes	MRC is a new role. However, has been appointed.	<p>Annual tenant report went to Housing Advisory Panel.</p> <p>Arrangements are in place to meet new requirements moving forward.</p>
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 	Yes	<p>In new policy - Corporate Complaints Policy (wigan.gov.uk)</p> <p>Jadu enables collaborative working on complaints.</p>	<p>Set out under 'service standards' section of the complaints policy (p.7)</p> <p>New complaints handling training.</p>

	<p>complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>Team Wigan behaviours give permissions for officers to respond to complaints accordingly.</p>	<p>Learning will feed into the Council's 'Be Accountable' and 'New Era' workstream.</p> <p>Action: Finalise new housing training plan.</p>
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