

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.

The Action Plan for work to be undertaken to become fully complaint is attached at the bottom of this self-assessment

Appendix A: Self-assessment form

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Section 1: Definition of a complaint			
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	Council Complaints Policy (last updated 2026) - Corporate Complaints Policy (wigan.gov.uk)	Definition in policy: <i>Page 3: 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	In current Complaints policy – Corporate Complaints Policy (wigan.gov.uk)	Current policy states: <i>Page 8: we will always seek to resolve matters by talking through your concerns initially. If at any point you would like to raise a formal complaint, simply let us know. We will treat it as such and follow our formal complaints procedure. You do not need to use the word 'complaint' for it to be recognised and handled accordingly.</i> <i>Page 9: a complaint will be progressed under Stage 1 of our formal procedure when you request that your concern be handled as a formal complaint, we are unable to resolve the issue initially or we consider formal escalation necessary to resolve your concern. You do not need to use the word 'complaint' for it to be recognised and handled accordingly.</i>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy – Corporate Complaints Policy (wigan.gov.uk) Reflected in Jadu – system guidance	The policy sets out definition for Service Requests: <i>Page 3: 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> JADU system affirms the classification of compliant and service request. Detailed guidance is available to all staff on intranet: Complaints . Training on Jadu and the new code sets this out also. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow
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	In current Complaints policy – Corporate Complaints Policy (wigan.gov.uk) Jadu system rolled out and training is included in this.	Current policy states: <i>Page 9: If you express dissatisfaction with the response to a service request, we will offer you the choice to make a formal complaint. If you choose to do so, the complaint will be logged and managed separately, and it will not delay, interrupt, or affect any actions being taken to resolve your original service request.</i> Examples available such as social media and inquiries being identified as complaints
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	Added to TSM Letter to state that any comments made would not be followed through with as a complaint. If there was a complaint guidance was provided in the letter on how a complaint can be made. Survey questions	Wording added to Tenant Satisfaction Measures Surveys
Section 2: Exclusions				
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 policy Corporate Complaints Policy (wigan.gov.uk)	Clear parameters set out in policy (pp. 3-4). Unreasonable behaviour set out (p.15)
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: The issue giving rise to the complaint occurred over twelve months ago.	Yes	In current policy Corporate Complaints Policy (wigan.gov.uk)	Updated in line with the Ombudsman's recommendations and set out in current policy (pp. 3-4).

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	- 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.			
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	In policy - Corporate Complaints Policy (wigan.gov.uk) There is discretion outside of the time limit.	Policy states: <i>Page 4: Complaints should be made within 12 months of either the date the issue occurred or the date you first became aware of the issue. If there is a valid reason why you could not make your complaint within this timescale, or if your complaint can still be effectively investigated, we will use discretion to consider it</i> This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Under policy section 'complaints that cannot be dealt with under this procedure' (p.5) it states: <i>Page 5: If your complaint falls into one of these categories, we will tell you why it cannot be accepted, explain how it will be handled otherwise, and inform you of your right to refer our decision to the Housing Ombudsman or Local Government and Social Care Ombudsman, as appropriate.</i>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'our promise' section of the policy (p.7).
Section 3: Accessibility and Awareness				
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 policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	Policy states: <i>Page 17; 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> This is covered in complaints code, Jadu initial training and will be covered by ongoing complaint handling training. Complaints form asks if the complainant requires additional support so adjustments can be identified This is place and complainants can advise of any adjustments needed. However, the triage process is now being further developed to ensure adjustments can be more easily identified and monitored – the internal process has now updated.
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 policy - Corporate Complaints Policy (wigan.gov.uk) Within the Jadu training.	Covered by definition in policy as covered in earlier sections. There has been a series of staff communications about the complaints codes and policy. This was also covered in complaints code and Jadu initial

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				training and will be covered by ongoing complaint handling training for new staff.
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	In policy - Corporate Complaints Policy (wigan.gov.uk) Website updated to the complaints pages.	Policy states: <i>Page 14: 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> Welcoming feedback on our services is part of Wigan Council's Progress With Unity work (See the Person / Listen Deeply) Staff undertake training on the ways of working. We have undertaken a major piece of work on our culture, building on national priorities on the tenant voice and tackling stigma (See the Person, See the Home Experience). We have incorporated complaint handling into this culture work. This was also covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training. Tenant Complaints Focus Group established to gather feedback and feed into the Council's work.
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Policy states: <i>Page 6: You can make a complaint to us in whichever way is easiest for you. We are committed to improving accessibility for everyone when accessing any of our services. If you need our complaints policy in an alternative format, please let us know and we will provide it at no cost.</i> The Complaints Policy is published on the Council's website and details the stage 1 & 2 requirements. The complaints process ensures complaints are accepted from complainants in all formats. 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. There is help available at customer facing offices such as the Life Centre/Contact Centre that can offer support accessing different versions. However, there is further work to be done to evidence the effectiveness of this and how it is monitored.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No	In policy - Corporate Complaints Policy (wigan.gov.uk)	We meet this partially as the policy and information on the Code and the Ombudsman is published on our website, information about the policy is also included in social media posts and tenant engagement communications. The policy document does not explicitly state how we will publicise.

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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 policy - Corporate Complaints Policy (wigan.gov.uk)	This is covered by the policy which states: <i>Page 6: 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> <i>A customer of the council is anyone who: · 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. 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> This is also set out in correspondence. Staff have been made aware of this.
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	Policy makes this clear - Corporate Complaints Policy (wigan.gov.uk) Templates and processes reflect this also.	Set out on p.12 & 13 of Complaints Policy. Included in Stage 1 and Stage 2 letters Included on the website: Housing Complaints
	Section 4: Complaint Handling Staff			
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	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. Governance overseen by: Assistant Director for Customer Experience and Support Assistant Director for Housing Elected Member Lead: Cllr Dane Anderton Corporate Complaints Policy (wigan.gov.uk)	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.
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.	Policy and Wigan Council's Progress with Unity Six Ways of Working for staff provide empowerment for staff to act to resolve complaints. Quality Assurance function has been built into 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. The complaints teams have access to staff at all levels and that stage 2 reviews are carried out by an independent officer.

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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 policy and Jadu system has been carried out.	This was covered in complaints code and Jadu initial training and will be covered by ongoing complaint handling training for new staff. To adequately resource complaint handling there has been an increase in staff resource within the Customer Care Team. Furthermore, there has been additional capacity provided to develop and implement the JADU system. There has been a series of staff communications about the complaints codes and policy. Tenant Complaints Focus group established to provide added quality assurance and checks. Group is updated on learning and changes made based on feedback from complaints.
	Section 5: The Complaint Handling Process			
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 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 policy - Corporate Complaints Policy (wigan.gov.uk)	Policy states: <i>Page 6: Any complaint about services provided by a third party acting on our behalf will be handled through our two-stage complaint process.</i> 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 policy - Corporate Complaints Policy (wigan.gov.uk)	There is work planned to increase awareness with third party contractors and to review the case recording and communication systems that are in place. Complaints process for tenants involving a third party has been clarified within the policy to avoid having additional stages but also to ensure we are aware of issues / trends to inform improvement.
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk)	Specific work being done with contractors to improve complaint handling and response times. This includes review of systems and changes to Key Performance Measures within specifications as contracts come up for procurement and work being done with existing contractors via contract review meetings to address issues with outstanding complaints. Work started with main contractors and is being continued with smaller contractors.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Partial	Recognise that there is more that we need do to improve customer experience.	Going forward, See the Person, See the Home and complaints training being offered to contractors.

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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 policy - Corporate Complaints Policy (wigan.gov.uk)	Policy States: <i>Page 9: Within 5 working days of receipt, we will send you a Stage 1 or 2 acknowledgement confirming receipt of your complaint; summarising the aspects of your complaint; stating the outcomes you are seeking; clarifying which parts we can and cannot investigate, including any elements that fall outside the Council's jurisdiction; and outlining next steps and anticipated timescales. If any aspect is unclear, we will contact you to request clarification.</i> The initial training for staff also covered these aspects. Updates to the policy in 2025 included the following requirements in the landlord's stage 1 acknowledgement and stage 2 escalations acknowledgement: - The outcomes the resident is seeking - Which aspects of the complaint the landlord is and is not responsible for.
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 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: 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	- Jadu training - Quality Assurance Programme - Complaints Quality Assurance system - Complaints survey findings - Complaints Tenant Focus Group	Set out in policy clearly. The policy states: <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> And in ‘our promise’ section of the policy (p.6). The initial training for staff also covered these aspects. The wider action plan relating to quality assurance for housing teams will be kept under review. Work for continual improvement is ongoing.
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.	No	In policy - Corporate Complaints Policy (wigan.gov.uk)	Policy states: <i>Page 8: we will keep you updated on progress and inform you what will happen next; if our response exceeds the extended Code timescales, we will agree with you, suitable intervals for progress updates</i> Set out in ‘time-scales’ section of the policy (p.7). This has now been included in the policy following the Housing Ombudsman recommendations. “if our response exceeds the extended Code timescales, we will agree with you, suitable intervals for progress updates”. Not currently. However, work is in progress to update the wording in holding letters, including more detailed explanations as to the reason why the timeframe is being extended, and to seek agreement with the resident for suitable intervals for keeping them informed about their complaint. This is being facilitated with the introduction of template holding letters via the online Complaints system to ensure that standard wording is included.
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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk) 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 an applied in all	The Jadu system has functionality to record required reasonable adjustments. This information is also collected when asking for preferred method of contact and any other relevant information.

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			interactions between the individual and the Council.	The complaints form on JADU now asks if the complainant requires additional support so adjustments can be identified. This information can be extracted as a report. However, there is more work to do to ensure that there is regular monitoring processes consistently across all housing services. This area aligns to the vulnerability project and IT/Performance and Insight Team data warehouse. A triage process is being further developed to ensure adjustments can be more easily identified and monitored consistently.
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 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.	Partial	In policy - Corporate Complaints Policy (wigan.gov.uk) Jadu system case recording	Jadu allows this but there are improvements to be made for capturing and recording third party correspondence. There is work planned to increase awareness with third party contractors and to review the case recording and communication systems that are in place. Work still ongoing.
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 complaints policy - Corporate Complaints Policy (wigan.gov.uk) In new redress policy – Putting Things Right: Redress Policy	Set out in the 'remedies' section of the Policy (p.10). The Redress Policy Approved and implemented; the policy is published on the website
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Under section 'Unreasonable Complainant Behaviour' in complaints policy (p.12). Restrictions are recorded by the Corporate Complaints Team and reviewed as needed. Restrictions kept under review. Stage 1s, no restrictions listed for housing in the last 12 months. Stage 2 has no restrictions.
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Under section 'Restricting access to Council services' in the complaints Policy (p.16) All staff are trained on the Equality Act.
	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 policy - Corporate Complaints Policy (wigan.gov.uk)	This happens in practice and case studies
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 policy - Corporate Complaints Policy (wigan.gov.uk) and website. JADU monitoring reports.	Set out on pp.8-9 of the policy. The initial training for staff also covered these aspects. We monitor our performance to ensure we comply with the timescales. J
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 policy - Corporate Complaints Policy (wigan.gov.uk) Details also set out on website. JADU monitoring reports.	JADU enables quicker allocation of complaints in the future, as well as monitoring of target dates, have seen performance improve since 2024. In addition, JADU is being updated to include drop-down menus for extension reasons to support monitoring and review.
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	In policy - Corporate Complaints Policy (wigan.gov.uk)	
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Policy states: <i>Page 14: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET • Phone: 0300 111 3000 Alternatively, you can submit a complaint using the Housing Ombudsman's online form at www.housing-ombudsman.org.uk</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 actioned promptly with appropriate updates provided to the resident.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU allows tracking of corrective action and pulls through to dashboard.	Policy states: <i>Page 10: The Stage 1 response will be recorded and made available to view as soon as the key findings and decisions are known, rather than waiting for all actions to be completed. The case timeline will be updated to reflect:</i> • complaint stage • complaint definition • the outcome of our investigation to date • decision on the complaint • any actions that remain outstanding • agreed intervals or milestone dates for updates • next steps and expected completion dates • details of any remedy offered to put things right Policy states: <i>Page 8: we will keep you updated on progress and inform you what will happen next; if</i>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<i>our response exceeds the extended Code timescales, we will agree with you, suitable intervals for progress updates</i> <i>• The Stage 1 response will be made available as soon as a substantive answer is known, even if some actions are still ongoing</i> <i>• The Stage 2 response will be made available as soon as key findings and decisions are known, even if some actions remain outstanding</i> <i>• Outstanding actions will be clearly listed, and the case timeline will be updated to reflect progress, giving you direct access to the latest information without needing to wait for separate communications</i> Stipulated under section 'Local Government and Social Care Ombudsman (LGSCO)' of the complaints policy (p.10). The initial training for staff also covered these aspects. Stage 1 & 2 extension letters include details of Ombudsman
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 policy - Corporate Complaints Policy (wigan.gov.uk) JADU process / templates	Tenant Complaints Focus Group established and have been undertaking quality assurance checks on complaints responses. Changes made to response letters as a result are an example of the impact this group is having. The Complaints Governance has been refreshed to incorporate the key role this group has. Work will 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 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	In policy - Corporate Complaints Policy (wigan.gov.uk)	<i>P10: If additional new issues are raised by the customer during a complaint investigation we will review and confirm whether they will be addressed as part of the ongoing investigation, logged separately as a new complaint (if unrelated), or would unreasonably delay the issuing of the complaint response.</i> Case examples available
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU templates	<i>Page 10 lists these requirements with the exception of 'reason for decision'</i> This is now included in complaints correspondence. Staff have received initial training on this and it is included in ongoing complaints handling training. Tenant Group have quality assured Complaints Letters and changes resulting from this have now implemented. All future changes to complaints processes and documentation will be shared with this group for review. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Action Plan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group which covers quality assurance.
	Stage 2			
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 policy - Corporate Complaints Policy (wigan.gov.uk)	6.11 Policy states: <i>Page 9: Within 5 working days of receipt, we will send you a Stage 1 or 2 acknowledgement confirming receipt of your complaint; summarising the aspects of your complaint; stating the outcomes you are seeking; clarifying which parts we can and cannot investigate, including any elements that fall outside the Council's jurisdiction; and outlining next steps and anticipated timescales. If any aspect is unclear, we will contact you to request clarification.</i>
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 policy - Corporate Complaints Policy (wigan.gov.uk)	6.12 Policy states: <i>Page 10: Your request to review your complaint at Stage 2 must be made within one month from the date of the Stage 1 response.</i>
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in the complaints policy under section 'The Complaints Procedure' (p.8) and under the formal complaint process for stage 2 (p.11)
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 policy - Corporate Complaints Policy (wigan.gov.uk)	The initial training for staff also covered these aspects.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	In 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.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk)	6.11 – <i>page 11: If a holding letter is issued it will advise that a further response is expected to be provided within 20 working days without good reason.</i> Logging figures are collected but not monitored. JADU does not currently have the option to record the reason for extension – this has just been agreed to be implemented with JADU to include drop-down menus for extension reasons.
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Stipulated under section 'Local Government and Social Care Ombudsman (LGSCO)' of the complaints policy (p.10). Stage 1 and 2 extension letters include details of Ombudsman
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 policy - Corporate Complaints Policy (wigan.gov.uk) JADU function for recording corrective actions and providing reports.	Policy states: <i>Page 11: The Stage 2 response will be recorded and made available as soon as the key findings and decisions are known, rather than waiting for all actions to be completed. Outstanding actions will be clearly listed with expected completion dates, and agreed intervals for updates will be confirmed.</i>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Policy states: <i>Page 8: we will keep you updated on progress and inform you what will happen next; if our response exceeds the extended Code timescales, we will agree with you, suitable intervals for progress updates</i> <i>• The Stage 1 response will be made available as soon as a substantive answer is known, even if some actions are still ongoing</i> <i>• The Stage 2 response will be made available as soon as key findings and decisions are known, even if some actions remain outstanding</i> <i>• Outstanding actions will be clearly listed, and the case timeline will be updated to reflect progress, giving you direct access to the latest information without needing to wait for separate communications</i> Set out in the policy. The initial training for staff also covered these aspects. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'service standards' section of the policy (p.7) Tenant Complaints Focus Group established and have been undertaking quality assurance checks on complaints responses. Changes made to response letters as a result are an example of the impact this group is having. The Complaints Governance has been refreshed to incorporate the key role this group has. Work will continue to develop quality assurance processes, including tenant voice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; 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	In policy - Corporate Complaints Policy (wigan.gov.uk) And templates	Set out in 'Formal Complaint' of the policy (p.10-11) This is also now included in complaints correspondence. Staff have received initial training on this. Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow We have an appointed Complaints Lead from the Housing Advisory Panel (HAP) who will be undertaking a quality assurance role. QA assurance workplan now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group
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 policy - Corporate Complaints Policy (wigan.gov.uk)	Set out in 'Formal Complaint - Stage 2' of the policy (p.11)
	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 intends to take, to put things right. These can include: - 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, procedures or practices.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) In Putting Things Right Policy: Putting Things Right Redress Policy	Set out in the 'Remedies' section of the complaints policy (p.10) Also covered by the new Redress Policy that has been approved by Cabinet. This is also now included in complaints correspondence. Staff have received initial training on this. A Quality Assurance Workplan is in place and being monitored by the Tenant Complaints Focus Group and the Council Officer Complaints Task and Finish Group The Redress Policy is published and implemented following approval by Cabinet
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) In Putting Things Right Policy: Putting Things Right Redress Policy	This is set out in 'redress' section of the complaints policy (p.10) and in the new Redress Policy. 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.
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			
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; 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	2025 complaints self-assessment and report. - Tenant annual report and KPI reports - Annual reports taken to Council cabinet and quarterly reports taken to Housing Advisory Panel and Senior Management Team.	Existing mechanisms in place to produce annual performance and improvement reports under the old code. These have been published online. These have been strengthened to take account of the requirements of the new codes and will also be published online. 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. A – 2025/ 26 self-assessment completed. B – The new Jadu system has improved the reporting functionality. However, there is more development needed to fully capture refused complaints. C – We can evidence action taken in response to non-compliance determinations by the Ombudsman. D – Jadu has provided robust ability to capture improvements made resulting from complaints. Furthermore, governance and quality

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				assurance processes have been strengthened to report themes and changes as a result. E – Following receipt of an annual report from the Ombudsman, findings and recommendations are being actioned and reported to both the Ombudsman and through the Council's governance structure to ensure learning is applied. More information on our performance can be found at: https://www.wigan.gov.uk/Resident/Housing/Council-homes/How-are-we-doing/Complaints-data.aspx We can identify complaints that have not been investigated by running a report on the following status's withdrawn, existing complaint, logged in error and sign posted to relevant service. For withdrawn complaint we add the reason for withdrawal so could run text analysis to categorise the reasons A further action for 25/26 is to develop integrated reporting to assess refused complaints.
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	Previously this has been reported to the Housing Advisory Panel (September 2025) and published online Browse meetings - Housing Advisory Panel Annual reports are taken to Council cabinet and Audit Committee and quarterly reports go to Housing Advisory Panel and Senior Management Team.	The annual complaints report taken to Housing Advisory Panel and Cabinet. The decision of Housing Advisory Panel and Cabinet in reviewing the annual complaints report will be published on the council's website. 2026 Self Assessment and Complaints report scheduled to go to HAP on 8th September 2026, Audit Committee on 17th September and Housing Business Board 30th September 2026. Reports made available to Lead for Complaints and regular briefings scheduled.
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.	Carried out for 2026 - biggest change was to the Complaints Policy following feedback from the Housing Ombudsman.
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.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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			
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	In policy - Corporate Complaints Policy (wigan.gov.uk) Tenant annual report New complaints report Development day programmes	Set out in the complaints policy under section 'Learning from complaints and customer engagement' (p.14-15) Tenant focus group held to shape content for performance reporting and annual report content – ensuring transparency.
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		Housing Service Manager Away day held to review complaints, develop quality assurance and promote awareness across services of requirements and positive complaints culture. Individual team meetings are being held to further embed positive complaints culture.
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		Wigan Council has a learning culture within the organisation. Revised governance and reporting processes have been put in place to ensure learning from complaints is embedded. However, there is some scope for improvement in relation to reporting. Action Plan that covers quality assurance now in place and overseen by Tenant Complaints Focus Group and Complaints Working Group
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	Assistant Director for Customer Experience and Support Assistant Director for Housing	Completed as part of governance review. Regular briefings and reports are provided.
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 confirmed	We also have Housing Advisory Panel tenant representative to lead on complaints: Councillor details - Councillor Dane Anderton Regular briefings and reports are provided.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Governance in place: - Quarterly corporate reports to Strategic Management Team and Housing Advisory Panel in progress - Annual report to go to Audit Committee and Cabinet	With JADU there is functionality to facilitate robust regular reporting into Housing Advisory Panel, Strategic Management Team, Audit Committee and Cabinet on housing specific complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: - regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; - regular reviews of issues and trends arising from complaint handling; - regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and - annual complaints performance and service improvement report.	Yes	MRC role appointed.	Annual tenant report went to Housing Advisory Panel, Housing Business Board and Audit Committee. Arrangements are in place to meet new requirements. Regular meetings held
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: - have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; - take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and - act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	In policy - Corporate Complaints Policy (wigan.gov.uk) JADU enables collaborative working on complaints. Team Wigan behaviours give permissions for officers to respond to complaints accordingly.	Set out under 'service standards' section of the complaints policy (p.8) Wider complaints handling training for staff who deal with Complaints via HQN. Further session booked in. Train the Trainer sessions to follow Learning will feed into the Council's 'Be Accountable' and 'New Era' workstream. Wider Housing Training plan being developed, specific Complaints Handling has been completed

Appendix B: Self-assessment Action Plan

Appendix B contains outstanding actions only.

Key to RAG rating:

	Completed
	On track
	Underway / partial actions outstanding / work that will be ongoing
	Delayed / not on track

Complaints Self-Assessment actions:							
16.	Complaints Monitoring Reporting	Annual Self Assessment	Performance and Insight Team	Complaints monitoring report should support management of performance monitoring, identification of trends, and recording of learning.	Process in place / ongoing / on track	- Meeting held with elected lead member regarding their role as lead member for complaints. - Work plan for tenant scrutiny group agreed with lead HAP member. 2025/26 Complaints report now due (Sept 26)	
29.	Third Party Complaint Handling	2024 Self-Assessment	Housing Lead	5.5 Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	September 2026 / Ongoing for new contractors onboarded	<u>In Progress</u> Compliant but recognise that there is more to do to improve customer experience Specific work being done with contractors to improve complaint handling and response times. This includes review of systems and changes to Key Performance Measures within specifications as contracts come up for procurement and work being done with existing contractors via contract review meetings to address issues with outstanding complaints. Going forward, See the Person, See the Home and complaints training being offered to contractors. All contractors have been notified, work ongoing to review and ensure that it is fully embedded.	
32.	Reasonable Adjustments	2024 Self-Assessment	Customer Experience and Support Service Manager / Housing Lead / Complaints (Audit) Officer	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.	A) January 2026 B) January 2026 C) October 2026 – full roll out	<u>Complete</u> Complaints form on JADU now asks if the complainant requires additional support so adjustments can be identified. Can be pulled off as a report. <u>In Progress</u> A) Triage process being developed to identify additional support requirements so adjustments can be identified B) A regular monitoring process will be established This will align with the vulnerability project and the IT/Performance and Insight Team's Data Warehouse Project	

Complaints Self-Assessment actions:							
39.	Acknowledging Stage 2 Complaints	2025 Self-Assessment	Customer Experience and Support Service Manager / Performance and Insight Team	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.	October 2026	<u>In Progress</u> Need to add Stage 2 complaints data regarding acknowledgement of a Stage 2 complaint to the Complaints Data Dashboard	
40.	The Complaint Handling Process	2026 Self-Assessment	Contact Centre / Complaints (Audit) Officer	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.	October 2026	<u>In progress</u> Updating the wording in holding letters, including more detailed explanations as to the reason why the timeframe is being extended, and to seek agreement with the resident for suitable intervals for keeping them informed about their complaint. This is being facilitated with the introduction of template holding letters via the online Complaints system to ensure that standard wording is included.	
41.	The Complaint Handling Process	2026 Self-Assessment		3.5 The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	October 2026	Reviewing and updating complaints policies and procedures to reflect emerging Housing Ombudsman guidance, lessons learned and sector best practice.	

Appendix C: Governance and Scrutiny

Being Accountable

As part of our commitment to being transparent and ensuring we are accountable to our tenants, the annual complaints self-assessment has been scrutinised by tenants and our governing bodies. It has been reported to:

Tenant Complaints Focus Group	31 st March 2026 – coincided with policy updates
Housing Complaints Task and Finish Group	August 12 th 2026
Housing Advisory Panel	September 8 th 2026
Internal Audit	September 17 th 2026
Housing Business Board	September 30 th 2026