

Appendix 1: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 1.2 | <p>A complaint must be defined as:</p> <p><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></p> | Yes | <p>Comments, compliments and complaints procedure Oxford City Council</p> | <p>This is defined within our Comments, Compliments and Complaints procedure. The section titled <i>‘What is a complaint?’</i> specifies:</p> <p><i>‘A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its staff, or those acting on behalf of the Council, affecting an individual citizen or group of citizens.’</i></p> |
| 1.3 | <p>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.</p> | Yes | <p>Comments, compliments and complaints procedure Oxford City Council</p> | <p>Our residents do not have to use the word ‘complaint’ for it to be treated as such. This is defined within our Comments, Compliments and Complaints procedure.</p> <p>The section titled <i>‘Who can make a complaint’</i> specifies:</p> <p><i>‘The Council will accept complaints from anyone who</i></p> |

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| | | | | <i>has used or been affected by a service provided by or on behalf of the Council. The Council will also accept complaints from anyone who is acting on behalf of a service user with their knowledge and consent.'</i> |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | Comments, compliments and complaints procedure Oxford City Council | <p>This is defined within our Comments, Compliments and Complaints procedure. In section titled '<i>What is a service request?</i>' it states:</p> <p><i>'Complaints and service requests can be closely related. A service request is a request for a service made for the first time, where it couldn't be reasonably expected that this should already have been actioned.</i></p> <p><i>When assessing whether to treat a contact as a complaint or a service request each case will be considered on its individual merits, and consideration may be given to the following factors. This list is not exhaustive:</i></p> <ul style="list-style-type: none"> • <i>Whether the customer</i> |

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| | | | | <p><i>has been made aware of the complaints procedure and has identified their contact as being a complaint</i></p> <ul style="list-style-type: none"> • <i>What the expression of dissatisfaction is about</i> • <i>The tone of the correspondence</i> • <i>What the customer would like to happen next</i> • <i>Whether the matter has already been treated as a service request'</i> <p>As a landlord we recognise the difference between a service request and a complaint. We follow the Housing Ombudsman definition on this matter.</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 | Comments, compliments and complaints procedure Oxford City Council | <p>As per our Comments, Compliments and Complaints procedure, we will consider 'Whether the matter has already been treated as a service request'.</p> <p>Front line staff are trained to recognise expressions of dissatisfaction as potential</p> |

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| | | | | complaints, empowered to offer to log them as such, and staff are aware that a complaint being logged should not prevent any immediate actions being taken or delay anything already in progress. |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes | | <p>Residents completing surveys through our website are provided with the link to the part of our website with details on how to make a complaint.</p> <p>Staff carrying out consultations and events with residents are aware of how to recognise complaints and encouraged to advise residents of how they can make a complaint or take the details and pass them to the Customer Care & Complaints team.</p> <p>We also gather real-time transactional satisfaction performance on completion of repairs & gas servicing, with direct interventions by team leaders/planners where satisfaction is less than required.</p> |

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| | | | | Residents completing our STAR survey were provided with the details on how they can make a complaint if they wish to do so. |
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Section 2: Exclusions

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>Our Comments, Compliments and Complaints procedure details what we may not accept as a complaint and provides alternative avenues for these issues where possible.</p> <p>When a complaint is not accepted, the resident is formally advised of this in writing, with the reason(s) why, and provided with the contact details for the Housing Ombudsman.</p> |
| 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 | Yes | Comments, compliments and complaints procedure Oxford City Council | <p>This is set out in our Comments, Compliments and Complaints procedure in the section titled '<i>What will not be treated as a complaint under this procedure</i>'.</p> |

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| | <p>months ago.</p> <ul style="list-style-type: none"> • 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 | <p>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.</p> | Yes | <p>Comments, compliments and complaints procedure Oxford City Council</p> | <p>This is detailed in our Comments, Compliments and Complaints procedure.</p> <p>The decision to decline to investigate a complaint is made by the Customer Care & Complaints Manager and is only done on the grounds of time limits when the length of time that has passed means we would be unlikely to be able to obtain the evidence to conduct a fair and thorough investigation.</p> |
| 2.4 | <p>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</p> | Yes | <p>https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report</p> | <p>When a complaint is not accepted, the resident is formally advised of this in writing, with the reason(s) why, and provided with the</p> |

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| | 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. | | | <p>contact details for the Housing Ombudsman.</p> <p>The number of complaints rejected and the reasons for this are recorded, monitored and reported on in our Annual Complaint Handling & Service Improvement report.</p> |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Comments, compliments and complaints procedure Oxford City Council | This is set out in our Comments, Compliments and Complaints procedure in the section titled ' <i>What will not be treated as a complaint under this procedure</i> '. |

Section 3: Accessibility and Awareness

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>This is set out in our Comments, Compliments and Complaints procedure, in the section <i>‘Reasonable Adjustments’</i>:</p> <p><i>‘Anyone is welcome to make a comment, compliment or complaint and the Council is committed to treating everyone fairly. If a complainant requires any particular assistance they are advised to let the Council know and state what assistance is required. This may include, for example, the provision of information in alternative formats (e.g. large print), the use of a language service, or communication through a representative.’</i></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 | Yes | | Our Comments, Compliments and Complaints procedure provides contact details for residents to raise complaints |

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| | pass details of the complaint to the appropriate person within the landlord. | | | <p>via the internet, by telephone, or in writing. It also advises they can make them directly to the relevant service.</p> <p>We accept complaints made to any member of staff. Training is regularly carried out to make staff aware of the complaints process, and everyone has the option to log the complaint themselves or pass the information on to the Customer Care & Complaints team.</p> |
| 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>Comments, compliments and complaints – Oxford City Council</p> <p>Complaints against us as a landlord Oxford City Council</p> | <p>Staff are encouraged to recognise potential complaints and offer to log them as such.</p> <p>The complaints pages, both general and housing-specific ones, can easily be found on our website by entering 'complaints' into the search bar.</p> <p>The complaints service and how to make a complaint is regularly featured in our Tenants In Touch magazine sent quarterly to residents.</p> |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This | Yes | <p>Comments, compliments and complaints procedure Oxford City Council</p> | <p>This is published on our website.</p> |

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| | 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. | | | Residents are also made aware of timescales and what happens at the stage they are at in complaint acknowledgement and outcome letters. |
| 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 | Comments, compliments and complaints procedure Oxford City Council Complaints about council housing – Oxford City Council | <p>Our Comments, Compliments and Complaints procedure has a section titled '<i>Ombudsman</i>'.</p> <p>We also have a page on our website that includes our self-assessment and annual report.</p> <p>Contact details for the Ombudsman (including a website address) is included with all formal complaint letters.</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 | Comments, compliments and complaints procedure Oxford City Council | This is detailed in our Comments, Compliments and Complaints procedure, in the section titled ' <i>Who can make a complaint?</i> ' |
| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>Our Comments, Compliments and Complaints procedure has a section titled '<i>Ombudsman</i>'.</p> <p>Contact details for the</p> |

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| | | | | Ombudsman (including a website address) is included with all formal complaint letters. |
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Section 4: Complaint Handling Staff

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>Within Landlord Services there is a complaints 'hub' made up of the Customer Care & Complaints Manager, and Customer Care & Complaints Officers. The hub takes responsibility for the investigating, resolving and responding to complaints, and monitoring actions and service improvement.</p> <p>Along with the Ombudsman Link Officer, the Customer Care & Complaints Manager liaises with the Ombudsman.</p> <p>The Customer Care & Complaints Manager is responsible along with senior management within Landlord Services for reporting to the governing body.</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 | Yes | | Those within the complaints hub are empowered to approach all necessary staff to |

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| | autonomy to act to resolve disputes promptly and fairly. | | | gather evidence and progress actions. Decisions on whether a complaint is upheld or not, remedies, and compensation are made by those in the hub. |
| 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 | | <p>Staff within the complaints hub undergo regular training via the Housing Ombudsman website and other providers.</p> <p>We provide guidance and training to staff within other teams around complaints.</p> <p>As of January 2025, we are recruiting an additional Customer Care & Complaints Officer.</p> |

Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>We have a single complaints procedure that is compliant with the Code.</p> <p>Those within the complaints hub ensure that customers are not treated differently by others if they complain, and there is a</p> |

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| | | | | process in place to ensure fair investigation should someone wish to complain about their treatment by someone handling their complaint. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | <p>We make every effort to ensure actions are completed prior to the complaint outcome letter being sent, and monitor outstanding actions when this is not possible.</p> <p>When a complaint is made via our Contact Centre, the officers have been trained to make any necessary arrangements for repairs etc prior to the investigation beginning.</p> <p>We have two complaint stages and treat anything that meets the definition of a complaint as such, providing the resident agrees to this.</p> |
| 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 | Comments, compliments and complaints procedure Oxford City Council | Our procedure has only 2 stages. |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a | Yes | | ODS (Oxford Direct Services) is a wholly owned company of |

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| | 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. | | | Oxford City Council. They follow our two stage process. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | | <p>ODS (Oxford Direct Services) is a wholly-owned company of Oxford City Council. They follow our two stage process.</p> <p>They share reports with us, seek advice, and we work collaboratively to ensure we are consistent and compliant.</p> |
| 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 | | We seek clarification where necessary, and all complaints include the complaint definition in the acknowledgement letter with a prompt for the customer to let us know if anything is incorrect or missing. When the customer has further comments that alter the definition, we issue an amended acknowledgement letter. |
| 5.7 | When a complaint is acknowledged at either stage, landlords must be clear | Yes | | The acknowledgement letter |

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| | which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear. | | | contains this as part of the complaint definition. Any issues that cannot be considered within the complaint are identified as such. |
| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. | Yes | | <p>Those working within the complaint hub are empowered to act independently, seek to fully understand the resident's situation and the impact on them, and carries out a thorough investigation, taking expert advice from colleagues where necessary, resulting in an evidence-based conclusion. If staff have previously been involved, the case handler will request an additional and/or more senior review of the situation.</p> <p>Staff handling complaints are able to challenge colleagues and contractors if they feel it is necessary and can escalate concerns to their manager.</p> <p>Letters written by the Customer Care & Complaints Officers are reviewed by the Customer Care & Complaints Manager.</p> |
| 5.9 | Where a response to a complaint will fall | Yes | | |

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| | outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | | | Any extensions to timescales are confirmed in writing and a new target date given. Complainants are provided with the direct contact details of the person handling their complaint. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | This is covered by the 'Reasonable Adjustments' section of our Comments, Compliments and Complaints procedure. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | Our Comments, Compliments and Complaints procedure sets out the reasons we may not accept a complaint. Any refusal to escalate would be confirmed in writing with the reasons given. Our complaint outcome letters all provide information on how to escalate to the next stage of the process. |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each | Yes | | Complaints are recorded on our CRM system, and all |

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| | 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. | | | outgoing letters are saved to this. Other documents are saved centrally to a folder accessible by the complaints hubs. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | This is detailed in our ' <i>How will complaints be dealt with?</i> ' section of our Comments, Compliments and Complaints procedure. |
| 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 | Comments, compliments and complaints procedure Oxford City Council https://www.oxford.gov.uk/comments-compliments-complaints/procedure-managing-vexatious-customers | This is included in our Comments, Compliments and Complaints procedure, in the sections titled ' <i>Reasonable and Unreasonable Behaviour</i> ' and ' <i>Managing unreasonable behaviour and vexatious complaints</i> '. It is also covered by our Procedure for Managing Vexatious Customers. |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard | Yes | https://www.oxford.gov.uk/comments-compliments-complaints/procedure- | See point 4.2 of our Procedure for Managing Vexatious |

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| | for the provisions of the Equality Act 2010. | | managing-vexatious-customers | Customers. |
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Section 6: Complaints Stages

Stage 1

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | | Every effort is made to resolve complaints at the earliest opportunity, having due regard to the complexity of the case, and any urgent issues are dealt with in a timely manner before the complaint response is sent out. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | As per our Comments, Compliments and Complaints procedure, stage 1 complaints are acknowledged within 5 working days of the complaint being received. |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged. | Yes | Comments, compliments and complaints procedure Oxford City Council | As per our Comments, Compliments and Complaints procedure, stage 1 complaints are responded to in full within 10 working days of the complaint being acknowledged, |

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| | | | | excluding where an extension is required. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | Any extensions to timescales are confirmed in writing and a new target date given. The reason for the extension is explained in the letter. |
| 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 | | We provide the contact details for the Housing Ombudsman in our extension letters, as well as in all other formal correspondence relating to a complaint. |
| 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 | | Outstanding actions are detailed in our complaint outcome letters, alongside timescales for completion when appropriate. These actions are monitored by the complaint handler, and the case is kept open on our CRM system in a 'monitoring' state until it has been confirmed that all agreed actions have been completed. |

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| 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 | | <p>Our letters address all points raised, provide reasons for decisions, and reference policy, law, the Ombudsman Code, etc, when relevant.</p> <p>Letters from the Customer Care & Complaints Officers are checked by the Manager to ensure this.</p> |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes | | <p>Prior to the acknowledgement letter being sent, we will add any additional issues raised to the complaint. After that point, we will include any related issues that are raised and will apply an extension if necessary to address these.</p> <p>Any non-related issues that are raised after the acknowledgement letter has been sent will be considered and if they meet the criteria of a complaint, a new stage 1 will be logged to address them.</p> |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; | Yes | | Our complaint outcome letters are modelled on the Ombudsman's template, and |

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| | 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. | | | include all of the required information. |
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Stage 2

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Comments, compliments and complaints procedure Oxford City Council | The right to escalate to stage 2 as the final stage is detailed in our Comment, Compliments and Complaints procedure, as well as in the stage 1 outcome letters. |
| 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 | Comments, compliments and complaints procedure Oxford City Council | As per our Comments, Compliments and Complaints procedure, stage 2 complaints are acknowledged within 5 working days of the escalation being requested. |
| 6.12 | Residents must not be required to | Yes | Comments, compliments and | |

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| | 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. | | complaints procedure Oxford City Council | Whilst we may ask for guidance from the complainant regarding what they consider to be outstanding and what outcome they are seeking, if this is not forthcoming we will proceed with the Stage 2 investigation and review the complaint in its entirety. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Comments, compliments and complaints procedure Oxford City Council | The Customer Care & Complaints Officer will handle a complaint at stage 1 and will investigate with colleagues from other teams. At stage 2, the Customer Care & Complaints Manager will consider the complaint, and wherever possible look to review evidence with more senior colleagues than those involved at stage 1. |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | Comments, compliments and complaints procedure Oxford City Council | As per our Comments, Compliments and Complaints procedure, stage 2 complaints are responded to in full within 20 working days of the complaint being acknowledged, excluding where an extension is required. |

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| 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 | Comments, compliments and complaints procedure Oxford City Council | Any extensions to timescales are confirmed in writing and a new target date given. The reason for the extension is explained in the letter. |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | | We provide the contact details for the Housing Ombudsman in our extension letters, as well as in all other formal correspondence relating to a complaint. |
| 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 | | Outstanding actions are detailed in our complaint outcome letters, alongside timescales for completion when appropriate. These actions are monitored by the complaint handler, and the case is kept open on our CRM system in a 'monitoring' state until it has been confirmed that all agreed actions have been completed. |
| 6.18 | Landlords must address all points raised in the complaint definition and provide | Yes | | Our letters address all points |

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| | clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | | | raised, provide reasons for decisions, and reference policy, law, the Ombudsman Code, etc, when relevant. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | | Our complaint outcome letters are modelled on the Ombudsman's template and include all of the required information. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | | Staff investigating complaints are empowered to approach all staff members necessary to gather evidence and gain an understanding in order to provide a thorough response. |

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>Comments, compliments and complaints procedure Oxford City Council</p> | <p>This is detailed in our Comments, Compliments and Complaints procedure, in the section '<i>How will complaints be dealt with?</i>'.</p> <p>Actions taken are detailed in the outcome letter, along with Next Steps for anything outstanding, and service improvements already identified at that stage. These are monitored within the complaint hub until completion.</p> |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | | We seek to gain an understanding of the impact of any service failure and consider this when offering remedies. |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in | Yes | | Actions taken are detailed in |

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| | agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | | | the outcome letter, along with Next Steps for anything outstanding, and service improvements already identified at that stage. These are monitored within the complaint hub until completion. Cases with outstanding actions remain open on our CRM system for monitoring. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | | We agree on remedies in consultation with the Ombudsman's published advice on remedies and compensation. |

Section 8: Putting things right

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|------------------|--|---|
| 8.1 | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | <p>https://www.oxford.gov.uk/complaints-council-housing</p> | <p>Our Annual Complaints Performance & Service Improvement report contains this information.</p> <p>The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on 16th October 2024. It was not possible to collate the end of year data and produce the report and present it to cabinet sooner due to the scheduling of their meetings. The report and governing body response have now been published.</p> <p>We intend to have the 2025 Annual Complaints Performance & Service Improvement report published by 30th June 2025.</p> |

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| 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 | https://www.oxford.gov.uk/complaints-council-housing | <p>The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on 16th October 2024. It was not possible to collate the end of year data and produce the report and present it to cabinet sooner due to the scheduling of their meetings. The report and governing body response have been published.</p> <p>We intend to take the 2025 report to Cabinet on 11th June 2025, and have their response ready to be published by 30th June 2025.</p> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | | We carry out the self-assessment annually and are committed to additional reviews should there be a significant restructure, merger and/or change in procedures. |
| 8.4 | Landlords may be asked to review and update the self-assessment | Yes | | We comply with all requests from the Ombudsman. |

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| | following an Ombudsman investigation. | | | |
| 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 | | If this situation did occur and we were unable to comply with the Code, then we would be committed to inform the Ombudsman and the affected complainants and publish this on our website with the appropriate timescales for the reconvening of the service. |

Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report#section6 | <p>We publish details of service improvements as part of our annual complaint performance and service improvement report.</p> <p>Identifying service improvements is considered an important part of a complaint investigation.</p> <p>The complaints hub liaises with the relevant department when trends are identified to examine possible improvements.</p> |
| 9.2 | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes | | <p>Complaints are regularly discussed in meetings and training sessions, including the benefits to the organisation of the information and opportunities they provide.</p> <p>The complaints hub encourages a positive</p> |

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| | | | | <p>approach to complaints within the organisation and build productive relationships with other teams in order to have open, well-informed discussions on resolutions and learning. We believe complaint investigations, resolution, and service improvements are best achieved through positive collaboration and clear ownership of issues.</p> |
| 9.3 | <p>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.</p> | Yes | <p>https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report#section6</p> | <p>Learning and improvement from complaints is reported as part of the Annual Complaints Performance & Service Improvement report. This is available on our website. This report is presented to the governing body annually.</p> <p>Information regarding complaints is regularly featured in our tenant newsletter.</p> <p>Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee). Minutes and</p> |

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| | | | | <p>reports from these meetings are published on our website.</p> <p>We are currently exploring the best format for involving residents more with complaints and service improvements, with a view to forming a panel to discuss our approach, improvements, and trends.</p> |
| 9.4 | <p>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.</p> | Yes | | <p>The Customer Care & Complaints Manager assesses themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. This is done in collaboration with the Customer Care & Complaints Officers, the complaints hubs handling non-housing related complaints, and management from other teams.</p> <p>The Landlord Services Manager has accountability for complaints handling.</p> |
| 9.5 | <p>In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support</p> | Yes | | <p>The Leader of Oxford City Council is responsible for complaints in their Cabinet portfolio.</p> |

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| | a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). | | | |
| 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>Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee). The MRC has access to this information and can approach staff at any point for further information.</p> <p>We will look to implement quarterly reporting to the MRC to ensure we are more proactively sharing information.</p> |
| 9.7 | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in | Yes | | <p>Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee).</p> <p>The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on</p> |

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| | <p>complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> | | | <p>16th October 2024. We intend to take the 2025 report to Cabinet on 11th June 2025.</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> <p>a. have a collaborative and co-operative approach towards resolving 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> | Yes | <p>Comments, compliments and complaints procedure Oxford City Council</p> | <p>This is all reflected in our Comments, Compliments and Complaints procedure.</p> <p>This approach is also regularly reinforced internally through training and communication, overseen by the Customer Care & Complaints Manager.</p> |