



NORWICH City Council

Committee name: Cabinet

Committee date: 17/07/2024

Report title: Complaints Performance and Service Improvement

Portfolio: Report Councillor Jones, cabinet member for housing

Report from: Executive director of housing and communities

Wards: All wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To report the council's first set of Tenant Satisfaction Measures, which is a new regulatory requirement for social housing providers under the Social Housing (Regulation) Act.

To report the new Complaints Performance and Service Improvement Report and to seek Cabinet's formal response to this report, which is a statutory requirement under the Housing Ombudsman's Complaint Handling Code.

Recommendation:

It is recommended that Cabinet:

- i) note the results of the first set of Tenant Satisfaction Measures (Appendix A)
- ii) note the Complaints Performance and Service Improvement report (Appendix B)
- iii) respond to the Complaints Performance and Service Improvement report.

Policy framework

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report responds to the ambitions as outlined under the “open and modern council” priority, specifically the outcomes “a council delivering excellence” and “a data and insight driven and people focused council”.

Background

1. The Social Housing (Regulation) Act gained Royal Assent in July 2023 and the requirements within the Act commenced from April 2024. The purpose of the Act is to ensure that all social housing residents across the country are safe, listened to, live in good quality homes and have access to redress when things go wrong. The Act gives the Regulator of Social Housing (RSH) strengthened powers and a revised regulatory framework to make sure all social housing providers comply with the requirements.
2. One of the new requirements is for all social housing providers to collect and publish a set of 22 standardised Tenant Satisfaction Measures (TSM). All social housing providers are required to publish their first set of TSM and to have submitted their results to the RSH by 30 June 2024.
3. The Social Housing (Regulation) Act is also aligned with the enhanced powers for the Housing Ombudsman and a new statutory complaint handling code, which commenced April 2024. One of the new requirements of the code is for all social housing providers to have published a Complaints Performance and Service Improvement Report by 30 June 2024.
4. Additionally, this report is required to be scrutinised by the social housing provider’s ‘Governing body’ and a response published alongside the report by 30 June 2024. The RSH will be monitoring social housing providers compliance with the Housing Ombudsman’s new complaint handling code, as part of their revised regulatory role.

Publication of the first set of TSMs

5. The RSH designed 22 standardised TSMs to support effective scrutiny by tenants so they can hold their landlord to account, and also for the regulator to review as part of their strengthened monitoring role. Twelve of the TSM are collected from a perception survey where tenants are asked about their satisfaction on a number of issues. The other 10 are performance measures that are collected by the social housing provider from their own records.
6. All social housing providers were required to collect this information during the financial year 2023-2024 and a technical specification sets out exactly how the measures should be collected and how the survey should be carried out. Some of the data could not be collected until after the financial year end and has been subject to a verification process, so there has been a tight timeframe to collate and publish the results by 30 June 2024.
7. The full set of results were submitted to the RSH by the 30 June 2024 deadline (Appendix A). The results were also published on our website by the 30 June 2024 deadline (www.norwich.gov.uk/TSM). Publication means that the council is fully compliant with this new regulatory requirement.
8. As this is the first year these measures have been defined and collected, there is no baseline to compare previous performance. The RSH is expected to publish the results from all housing providers in due course. In the meantime

we have shared our results with Housemark, a benchmarking organisation, and are expecting to see the first set of comparable data around mid-July.

Publication and scrutiny of a new Complaints Performance and Service Improvement Report

9. The Housing Ombudsman's new statutory complaint handling code was published in February 2024, and came into effect on 1 April 2024. The code set out a new requirement to publish a Complaints Performance and Service Improvement Report by 30 June 2024, which was specified to include six separate items, including a 33-page self-assessment against the code and a qualitative and quantitative analysis of complaints performance for 2023-2024.
10. The report was submitted to the Housing Ombudsman by the 30 June 2024 deadline (Appendix B). The report was also published on our website by the 30 June 2024 deadline (www.norwich.gov.uk/SelfAssessment and www.norwich.gov.uk/CPSIR). Publication means the council is compliant with this requirement of the new complaint handling code.
11. Of the 72 criteria in the self-assessment, the council has met 63 (88% compliance) of these, with nine not met. Two of these criteria will become compliant as soon as Cabinet have responded to this report.
12. The complaint handling code also states that the report is required to be scrutinised by the housing provider's 'Governing body' and a response published by the same deadline of 30 June 2024. The purpose of the Governing body's response is to provide assurance that the self-assessment is a true reflection of the landlord's complaint handling.
13. The Housing Ombudsman did not clearly set out their requirements for the report until 22 May 2024 and at the same time confirmed that for councils the 'Governing body' would be their Cabinet. Several other Local Authorities raised questions with the Housing Ombudsman around the short timeframe and difficulties with busy Cabinet agendas.
14. On 5 June 2024, after the general election had been called, the Housing Ombudsman acknowledged that the election timing may cause issues with this requirement. The Housing Ombudsman still expects housing providers to report they are not compliant with the requirement to publish the Governing Body response by 30 June 2024, but have said they are likely to agree the delay is reasonable.
15. As soon as Cabinet has responded to the report, it will be resubmitted to the Housing Ombudsman and our compliance will increase to 90%.

Consultation

16. No consultation is required.

Implications

Financial and resources

17. There are no proposals in this report that would reduce or increase resources.

Legal

18. The legal implications are:

- It is a regulatory requirement for social housing providers to collect and publish TSM. The RSH has a range of enforcement powers it can use to hold landlords to account, ranging from performance improvement plans to issuing limitless fines. The higher the level of risk, the greater the level of scrutiny and the stronger the actions are likely to be.
- It is a statutory requirement for social housing providers to comply with the Housing Ombudsman's Complaint Handling Code. Failure to comply could result in the Housing Ombudsman issuing a complaint handling failure order.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	No implications
Health, social and economic impact	No implications
Crime and disorder	No implications
Children and adults safeguarding	No implications
Environmental impact	No implications

Risk management

Risk	Consequence	Controls required
Risk of non-compliance if we are not able to comply with the requirement to publish our Cabinet response to the Complaints Performance and Service Improvement Report by 30 June 2024.	The Housing Ombudsman has the power to issue a complaint handling failure order.	The Housing Ombudsman has acknowledged that the election timing may cause issues with this requirement and have said they are likely to agree the delay is reasonable. The delay will be minimal as Cabinet are meeting on 17 July to provide a response.

Other options considered

19. There are no other options.

Reasons for the decision/recommendation

20. In order to comply with the new regulatory requirements for social housing providers and to comply with the Housing Ombudsman's Complaints Handling Code, it is recommended that Cabinet:

- i) note the results of the first set of TSM (Appendix A)
- ii) note the Complaints Performance and Service Improvement report (Appendix B)
- iii) respond to the Complaints Performance and Service Improvement report.

Background papers: None.

Appendices:

Appendix A – TSM results

Appendix B – Complaints Performance and Service Improvement report

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Tenant Satisfaction Measures (TSMs)

New [Tenant Satisfaction Measures](#) were introduced by the Government on 1 April 2023 which are designed to help to monitor how well landlords are doing at providing quality homes and services, and to understand how they can make improvements.

There are 22 tenant satisfaction measures, which includes 12 tenant perception measures and 10 management information measures.

How data was collected for 1 April 2023 to 31 March 2024

As part of the new measures, we have been collecting data on how we are doing at completing repairs, keeping homes safe, and engaging with our customers.

Twelve of the results are from a tenant perception survey and are coded TP for tenant perception. To get this information we commissioned Viewpoint, an independent market research organisation, to carry out the survey on our behalf.

During 2023-24 they contacted 250 tenants every three months until they had achieved the required sample size of 1,000 tenants to ensure the responses were representative of our wider tenant population. With this sample size we can be 95% confident that the results are accurate to within +/-3%, which is considered statistically robust for this type of survey.

The survey was mostly carried out by telephone, with a small proportion carried out by email as we did not have a telephone number for some of the tenants selected at random.

Viewpoint managed to achieve a [representative sample](#) based on the gender, age, disability and ethnicity of our wider tenant population, as well as property types and geographical area, and so no weighting was applied to any of the results.

We've grouped both the results from the tenant survey and those from our management systems into common themes which we hope makes it easier to read.

We would like to thank everyone who took part in this survey. We really appreciate you taking the time to share your views and give us your feedback.

How did we do?

Overall satisfaction with the service

64.2%

Proportion of respondents who report that they are satisfied with the overall service (TP)

Keeping properties in good repair

66.4%

Proportion of respondents who report that they are satisfied with the overall repairs service (TP)

58.6%

Proportion of respondents who report that they are satisfied with the time taken to complete the most recent repair (TP)

64.1%

Proportion of respondents who report that they are satisfied we provide a home that is well maintained (TP)

0.3%

Proportion of homes that do not meet the Decent Homes Standard

96.7%

Emergency repairs completed within the target timescale

87.1%

Non-emergency repairs completed within the target timescale

Maintaining building safety

75.7%

Proportion of respondents who report that they are satisfied we provide a home that is safe (TP)

100%

Proportion of homes for which all required gas safety checks have been carried out

100%

Proportion of homes for which all required fire risk assessments have been carried out

99.2%

Proportion of homes for which all required asbestos safety checks have been carried out

100%

Proportion of homes for which all required water safety checks have been carried out

100%

Proportion of homes for which all required lift safety checks have been carried out

Respectful and helpful engagement

53.9%

Proportion of respondents who report that they are satisfied we listen to your views and act upon them (TP)

67.5%

Proportion of respondents who report that they are satisfied we keep you informed about things that matter to you (TP)

76.6%

Proportion of respondents who report that they agree that tenants are treated fairly and with respect (TP)

Effective handling of complaints

21%

Proportion of respondents who report that they are satisfied with our approach to handling anti-social behaviour (TP)

83.8

Number of stage 1 complaints per 1,000 properties

13.5

Number of stage 2 complaints per 1,000 properties

44.8%

Proportion of stage 1 complaints responded to in target

64.9%

Proportion of stage 2 complaints responded to in target

Responsible neighbourhood management

47.4%

Proportion of respondents who report that they are satisfied we keep communal areas clean and well maintained (TP)

56%

Proportion of respondents who report that they are satisfied we make a positive contribution to your neighbourhood (TP)

55.9%

Proportion of respondents who report that they are satisfied with our approach to handling anti-social behaviour (TP)

80.5

Number of anti-social behaviour cases (including hate) opened per 1,000 properties

0.6

Number of anti-social behaviour cases (hate only) opened per 1,000 properties



Housing complaints performance and service improvement report 2023-24

Section 1: Introduction

Norwich City Council welcomes feedback from residents.

Handling complaints effectively allows us to address issues, learn from them and prevent future occurrences.

The Housing Ombudsman is responsible for investigating complaints about social housing providers.

In April 2024, the Housing Ombudsman introduced a new complaint handling code to ensure complaints are addressed fairly, effectively and promptly.

This report includes our self-assessment against the Housing Ombudsman complaint handling code, as well as providing information on the complaints we received during 2023-24, some examples of service improvements we have made as a result of learning from complaints and an overview of our Housing Ombudsman cases.

Section 2: Annual self-assessment

We have completed a self-assessment (June 2024) against the Housing Ombudsman Complaint Handling Code.

This ensures we align our policies and practices to provide a prompt and effective complaints service.

[Our full self-assessment is published online.](#)

The areas where we need to improve are:

- We do not routinely keep residents informed about their complaint if we are unable to fully respond within the timescale.
- We do not currently have a process to prioritise complaints by the complexity of the complaint or by the residents' personal circumstances.
- We do not acknowledge 100% of our complaints within 5 working days of receipt.
- We do not respond to 100% of our stage 1 complaints within 10 working days of receipt.
- We do not currently have a standard objective in relation to complaint handling for all relevant employees or third parties.

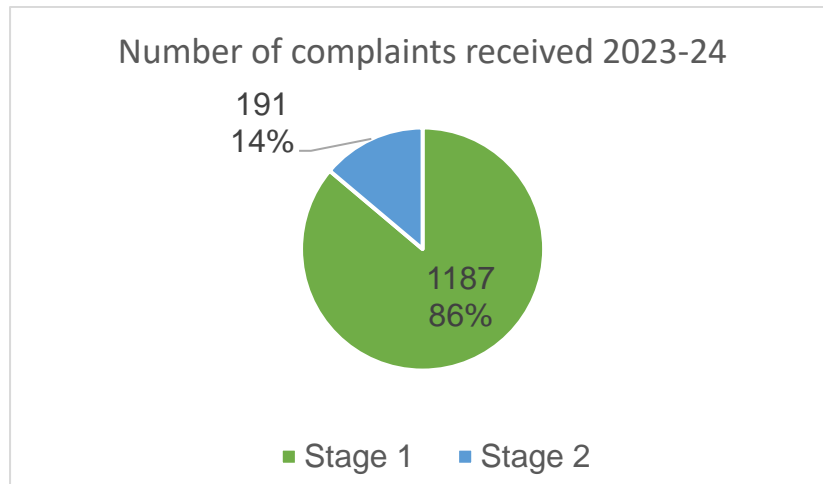
Section 3: Performance

Overall

We received 1,378 complaints about council housing between 1 April 2023 and 31 March 2024.

1,187 complaints were responded to at stage 1 of our complaints process.

191 were escalated to stage 2.



The Housing Ombudsman and the Regulator of Social Housing both regard effective complaint handling and listening to tenants as important.

There has been high media coverage of some failings in the social housing sector and the Housing Ombudsman has run publicity campaigns such as 'make it right' to raise the profile of making a complaint.

We embrace a positive complaints culture as this is key to enhancing and improving our services.

During 2023-24 we have not kept a record of any complaints we refused to accept in line with the exclusions in our published complaint policy. From April 2024 we will be keeping a record of these complaints.

Stage 1 complaints

Of the 1,187 stage 1 complaints received, 532 (45%) were responded to within the Housing Ombudsman timeframe of 10 working days.

This does not meet the Housing Ombudsman requirement to respond to all stage 1 complaints within 10 working days. As part of monitoring our performance against the response time, processes were reviewed during quarter 4, which resulted in quarter 4 performance improving to 63% responded to within 10 working days. We are committed to improving this performance during 2024-25.

Responsive repair issues represented the largest proportion of stage 1 complaints (45%)

Stage 1 complaint category	Percentage
Responsive repairs	45%
Tenancy and neighbourhood issues	12%
Contractors	10%
Planned maintenance and upgrades	9%
Antisocial behaviour	4%
Rent and service charges	4%
Lettings	3%
Building safety	2%
Garages	2%
Leasehold and right to buy	2%
Other	7%

The most common theme was:

Stage 1 complaint theme	Percentage
Standard of service provided	43%
Failing to provide an agreed service	25%
Service requested but not provided	20%
Employee or contractor attitude or conduct	3%
Other	9%

781 (66%) of stage 1 complaints were upheld.

Stage 2 complaints

Of the 191 stage 2 complaints received, 124 (65%) were responded to within the Housing Ombudsman timeframe of 20 working days.

This does not meet the Housing Ombudsman requirement to respond to all stage 2 complaints within 20 working days.

Responsive repair issues represented the largest proportion of stage 2 complaints (53%).

Stage 2 complaint category	Percentage
Responsive repairs	53%
Contractors	6%
Planned maintenance and upgrades	6%
Antisocial behaviour	5%
Tenancy and neighbourhood issues	4%
Lettings	3%
Rent and service charges	3%
Building safety	2%
Garages	2%
Leasehold and right to buy	2%

Stage 2 complaint category	Percentage
Other	14%

The most common theme was:

Stage 1 complaint theme	Percentage
Standard of service provided	35%
Failing to provide an agreed service	28%
Service requested but not provided	19%
Employee or contractor attitude or conduct	2%
Other	16%

97 (51%) of stage 2 complaints were upheld.

Tenant Satisfaction Measures

During 2023-24 we commissioned a market research organisation, called Viewpoint, to carry out an independent satisfaction survey of our tenants.

One of the questions asked respondents “how satisfied or dissatisfied are you with Norwich City Council’s housing service complaint handling?”. Of the 224 respondents who answered this question, 21% were satisfied.

This falls short of our own aspiration and tells us we are not meeting the standard you expect from us.

The early results of this standardised survey from other large housing providers reflect that this figure is low across the housing sector, but this does not make it acceptable, and we recognise the need for improvement.

Section 4: Learning and service improvement

Managers in the housing service meet on a quarterly basis to review the quality of complaint handling, to ensure timely responses are being provided and to share learning from cases.

Stage 2 cases are sampled by an independent officer to check for consistency and fairness.

Improving the learning and insights from complaints is a priority for the housing service.

During 2024-25 we will be implementing a new IT system to help us handle complaints more effectively and capture themes, outcomes and learning more easily.

Here are some examples of the learning points for us from complaints received during 2023-24:

You said our rent arrears team did not take known personal circumstances into account when pursuing a debt after a tenancy has ended. We have changed our recovery procedure to ensure we balance the debt recovery with any personal circumstances and particularly in cases of domestic abuse.

You said our standard letters were not always easy to understand. We have started to review all our standard letter and email templates. We are engaging with local voluntary and community organisations on the content and will be setting up a customer feedback panel to ensure you are involved in the review process.

You said waste and recycling bins were not always present when you move into one of our homes. We now ensure we have requested these ahead of your tenancy starting.

You said the different rates we charge for garages were confusing. We have now made the charges for garages much simpler and no longer base charges on the demand in the area.

You said our antisocial behaviour officers did not reply to contact about noise nuisance. We have improved our working practices and will ensure communication is dealt with during periods when an officer involved in a case is absent.

You said our antisocial behaviour officers did not always show ID and official communication was not always on headed paper. We have reminded all officers to always show ID and use headed paper to reassure residents that our letters are genuine.

You said the lift at a tower block was frequently breaking down. Our contractor has made adjustments following advice from the drive supplier and a senior officer is liaising with our contractor over future improvements.

You said our out of hours service did not take your health issues into account when prioritising an urgent repair. Our contractor sincerely apologised for this and has reminded call handlers to take into account customer's personal circumstances.

You said sometimes your interactions with our repairs operatives fall short of your expectations. We meet regularly with our repairs contractors to monitor performance and remind them to adhere to the standards and codes of conduct expected of them.

Section 5: Housing Ombudsman findings

If a tenant is not satisfied with our response after a stage 2 final response has been issued, they have the right to approach the Housing Ombudsman and request an impartial review.

The Housing Ombudsman published two determinations against Norwich City Council housing service during 2023-24.

[Case 1 \(click to view full published report\)](#)

For our handling of a report of damp and mould in a property, a finding of 'severe maladministration' was found by the Ombudsman. The finding related specifically to our failure to show we took appropriate and timely action to resolve the reported damp and mould, and this resulted in significant and unreasonable distress and inconvenience to the resident. There was also a finding of 'maladministration' in respect of how we handled the complaint, with the Ombudsman determining we had been dismissive, lacked empathy and had not sought to learn from the residents' experience.

A sincere apology was given to the resident along with financial recompense. We have since independently reviewed this case, alongside reviewing our record keeping and information we publish in relation to our repairs timeframes.

[Case 2 \(click to view full published report\)](#)

For our handling of a report of antisocial behaviour, a finding of 'service failure' was found by the Ombudsman. The finding related specifically to our failure to respond within the timeframes in our Antisocial behaviour policy.

Compensation was given to the resident for the distress and inconvenience caused and our process for responding to reports of antisocial behaviour has been amended.

Annual report

The Housing Ombudsman publishes an annual report on any Landlord with more than 5 findings against them in a year.

The Housing Ombudsman publishes these reports in September each year.

We received a report for the year 2022-23:

[Housing Ombudsman report on Norwich City Council \(click to view full published report\)](#)

Section 6: 2024-25 action plan

In order to improve our complaint handling, the following actions have been identified and will be implemented:

Action to be taken	By whom	By when
Introduce a procedure to keep residents informed about their complaint if we are unable to fully respond within the timescale.	Executive director of communities and housing	31 March 2025
Make changes to our IT system so we can prioritise complaints by the complexity of the complaint or by the residents' personal circumstances.	Executive director of communities and housing	31 March 2025
Improve our performance to acknowledge 100% of our complaints within 5 working days of receipt.	Executive director of communities and housing	31 March 2025
Improve our performance to respond to 100% of our stage 1 complaints within 10 working days of receipt.	Executive director of communities and housing	31 March 2025
Improve our performance to respond to 100% of our stage 1 complaints within 20 working days of receipt.	Executive director of communities and housing	31 March 2025
Introduce a standard objective in relation to the expectations for complaint handling for all relevant employees or third parties.	Executive director of communities and housing	31 March 2025

Complaint handling code self-assessment – June 2024

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints policy, section 2, para 1 Corporate complaints policy	We have adopted this definition in our approved complaints policy, apart from we refer to ‘organisation’ rather than ‘landlord’ as our policy covers all complaints made to us as a local authority.
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	Complaints policy, section 2, para 2 Corporate complaints policy Complaints policy, section 5, para 2 Corporate complaints policy	Our residents do not have to use the word ‘complaint’ for it to be treated as such. We process complaints received from third parties in line with our complaints policy.

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, section 4, para 1, bullet point 2 Corporate complaints policy Webpage What is a complaint	We recognise the difference between a service request and a complaint and set this out in our policy. Our website describes what is not considered a complaint and provides links to make service requests.
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	Webpage What is a complaint	Our website sets out some examples of what would be considered as a complaint, which includes not carrying out a service to an agreed standard or not responding to a service request within a stated timescale.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	We are aware of this requirement. When we seek feedback on our services, we provide details of how to make a complaint.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints policy, section 4, para 2 Corporate complaints policy	We provide a detailed explanation if we do not accept a complaint, and the right to take our decision to the appropriate Ombudsman.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Complaints policy, section 4 Corporate complaints policy	Our complaints policy sets out the exclusions, including where the complaint is made more than 12 months since the issue arose, and if the issue is subject to existing rights of appeal or legal remedy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 4 Corporate complaints policy	We accept complaints if they have been made within 12 months of the issue occurring, unless excluded on other grounds. If a complaint has been made outside of the 12 month period, discretion is applied where there are good reasons.
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	Complaints policy, section 4, para 2 Corporate complaints policy	We provide a detailed explanation if we do not accept a complaint, and the right to take our decision to the appropriate Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy, section 4 Corporate complaints policy	We do not take a blanket approach to excluding complaints.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Complaints policy, section 6 Corporate complaints policy</p> <p>Complaints policy, section 7 Corporate complaints policy</p> <p>Equality policy Equality, Diversity and Inclusion</p>	<p>We provide different channels to make a complaint.</p> <p>We take into account communication preferences and make reasonable adjustments in line with the Equality Act 2010.</p> <p>We have an approved equality, diversity and inclusion policy.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Webpage How to make a complaint</p>	<p>Our website sets out the various ways to make a complaint.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	We are aware of this requirement.
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	Complaints policy, section 9 Corporate complaints policy	Our complaints policy is in a clear and accessible format, and is published on our website. The policy details the two-stage complaint process, what will happen at each stage and the timeframes for responding.
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	Complaints policy, section 1, para 5, bullet point 1 Corporate complaints policy TLC magazine TLC magazine - Spring 2024	Our policy sets out how it will be publicised. Information about the Ombudsman was publicised in TLC magazine in Spring 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Webpage Complaining on behalf of others	Our website sets out how someone can act on behalf of others in relation to a complaint.
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	Complaints policy, section 10 Corporate complaints policy	Our policy includes links to the Ombudsman services websites. We provide information on how to contact the relevant Ombudsman as part of our stage 2 response.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints policy, section 8, Corporate complaints policy	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>We have a designated customer experience lead who has responsibility for day-to-day monitoring of compliance with the complaints policy.</p> <p>This role is responsible for monitoring performance indicators and management information and reporting performance to key stakeholders.</p> <p>This role is responsible for liaison with both Ombudsman services.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>These officers have access to staff at all levels to facilitate the prompt resolution of complaints.</p> <p>These officers have the authority and autonomy to act to resolve disputes promptly and fairly.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	<p>Managers are responsible for handling stage 1 complaints.</p> <p>Heads of service are responsible for managing stage 2 complaints.</p> <p>We procure training on effective complaint handling from experienced Ombudsman staff.</p> <p>A quarterly meeting for housing and property services managers is held to review complaint handling and lessons learned.</p>

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints policy Corporate complaints policy	We have a single policy in place for dealing with complaints.
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	Complaints policy, section 9 Corporate complaints policy	We have a two-stage process and do not have extra named stages.
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	Complaints policy, section 9 Corporate complaints policy	We have a two-stage process and do not have extra named stages.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints policy, section 9 Corporate complaints policy	Complaints handled by our repairs and maintenance contractor form part of our two-stage process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	Complaints handled by our repairs and maintenance contractor are in line with the Code. The same training is provided to any third parties that handle our complaints.
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	Complaints policy, section 9 Corporate complaints policy	Complaints are acknowledged within 5 days of receipt. The acknowledgement sets out our understanding of the complaint and the outcomes the resident is seeking.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	If we are not responsible for any aspects of the complaint, this is made clear in the acknowledgement.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	N/A	<p>Our complaint handlers are trained to deal with complaints in this way.</p> <p>The course is delivered by experienced Ombudsman staff and covers:</p> <ul style="list-style-type: none"> • Defining and analysing complaints • Planning investigations • Making the best use of sources of information • Evaluating information and making sound decisions • Communicating decisions effectively • Resolving and learning from complaints.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	N/A	We do not routinely keep residents informed about their complaint if we are unable to fully respond within the timescale. This is on our action plan to improve during 2024-25.
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	Complaints policy, section 7 Corporate complaints policy Equality policy Equality, Diversity and Inclusion	We take into account communication preferences and make reasonable adjustments in line with the Equality Act 2010. We have an approved equality, diversity and inclusion policy. We keep a record of any disabilities a resident has disclosed.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9.2, para 4 Corporate complaints policy Complaints policy, section 4 Corporate complaints policy	If we decline to escalate a complaint through all stages of the complaints procedure, we advise in writing the reasons and confirm the right to approach the relevant Ombudsman about this decision. Our reasons for declining to escalate a complaint are set out in the exclusions part of our policy.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	N/A	A full record is kept of the complaint, all correspondence, relevant supporting documentation and the outcome.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 11 Corporate complaints policy	Our policy sets out that complaints can be remedied at any stage of the complaint process.
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	Complaints policy, section 5, para 4 Corporate complaints policy Persistent complaints policy Persistent complaints, enquiries and unreasonable behaviour policy	Our complaints policy refers to how we will manage unacceptable behaviour and unreasonable persistent complaints. We have an approved policy for unreasonably persistent complainants which sets out the reasons for putting any restrictions in place and the review process.
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	Persistent complaints policy, section 3.3 Persistent complaints, enquiries and unreasonable behaviour policy	Our persistent complaints policy sets out proportionate restrictions and how individual factors are considered when deciding an appropriate course of action.

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.	No	N/A	We do not currently have a process to prioritise complaints by the complexity of the complaint or by the residents personal circumstances. This is on our action plan to improve during 2024-25.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	No	N/A	We do not acknowledge 100% of our complaints within 5 working days of receipt. This is on our action plan to improve during 2024-25.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	No	N/A	We do not respond to 100% of our stage 1 complaints within 10 working days of receipt. This is on our action plan to improve during 2024-25.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 Corporate complaints policy	If an extension is needed to respond to a stage 1 complaint, an explanation will be provided and the extension will be for no more than 10 working days.
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	N/A	If an extension is needed to respond to a stage 1 complaint, the contact details of the relevant Ombudsman will be provided.
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	N/A	We respond to the complaint when the answer is known. If there are outstanding actions required to address the issue, these will be actioned promptly and appropriate updates given.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 Corporate complaints policy	Our complaint handlers address all points in the complaint and provide clear reasons for any decisions, and reference policy, law and good practice where relevant.
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	Complaints policy, section 9 Corporate complaints policy	Additional complaints raised during a stage 1 investigation will be incorporated if they are related and the response has not been issued. A new complaint will be logged if the stage 1 response has been issued, new issues are unrelated or if investigating the new issues would unreasonably delay the response.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Complaints policy, section 9.1, para 3 Corporate complaints policy	Our complaint handlers are trained to provide a full response that meets the expectations of the Code and is clear and uses plain language.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints policy, section 9 Corporate complaints policy	We have a two-stage process with stage 2 being our final response.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	No	N/A	We do not acknowledge 100% of our complaints within 5 working days of receipt. This is on our action plan to improve during 2024-25.
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	Complaints policy, section 9.2, para 3 Corporate complaints policy	We do not require an explanation for escalating a complaint to stage 2. We will set out our understanding of the issues as part of the acknowledgement.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy, section 9.2, para 3 Corporate complaints policy	We appoint a different complaint handler to the person who considered the complaint at stage 1.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	No	N/A	We do not respond to 100% of our stage 2 complaints within 20 working days of receipt. This is on our action plan to improve during 2024-25.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 Corporate complaints policy	If an extension is needed to respond to a stage 2 complaint, an explanation will be provided and the extension will be for no more than 20 working days.
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	N/A	If an extension is needed to respond to a stage 2 complaint, the contact details of the relevant Ombudsman will be provided.
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	N/A	We respond to the complaint when the answer is known. If there are outstanding actions required to address the issue, these will be actioned promptly and appropriate updates given.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 9 Corporate complaints policy	Our complaint handlers address all points in the complaint and provide clear reasons for any decisions, and reference policy, law and good practice where relevant.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on the complaint; • the reasons for any decisions made; • the details of any remedy offered to put things right; • details of any outstanding actions; and • details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Complaints policy, section 9.2, para 3 Corporate complaints policy	Our complaint handlers are trained to provide a full response that meets the expectations of the Code and is clear and uses plain language.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints policy, section 9.2 Corporate complaints policy	We have a two-stage process with stage 2 being our final response. Heads of service are responsible for managing stage 2 complaints.

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	Complaints policy, section 11 Corporate complaints policy	<p>Our complaints policy sets out we will acknowledge when something has gone wrong and will take action to put things right.</p> <p>The Council does not, by default, offer compensation. We are responsible for public resources and any such decisions have to be carefully considered; compensation would usually only be provided where a complainant had suffered a genuine loss as a result of the Council's action and in most situations our focus is on offering a remedy to the situation.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy, section 11, para 2 Corporate complaints policy	Where a remedy is offered, this remedy will be achievable, will be fair, and will reflect the extent of any service failures and the level of detriment caused to the complainant as a result.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy, section 11, para 2 Corporate complaints policy	Where a remedy is offered, this will clearly set out what will happen and by when, and will be followed through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	N/A	We take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> • the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. • 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; • any findings of non-compliance with this Code by the Ombudsman; • the service improvements made as a result of the learning from complaints; • any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Link to CPSI report	We have produced a complaints performance and service improvement report for 2023-24.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No	N/A	Due to the general election being called, we are not able to present the annual report to our Cabinet by the due date of 30 June. The report will be presented at the next Cabinet meeting in July 2024 and their response will be published at that time.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	We are aware of this requirement.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We are aware of this requirement.
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	N/A	We are aware of this requirement.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	N/A	We review every complaint to consider whether service improvements can be made as a result of learning from the complaint.
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	Complaints policy, section 1 Corporate complaints policy	We take all complaints seriously and every complaint is seen as an opportunity for us to put things right, improve our services, and to provide vital intelligence on our performance, culture, and reputation.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Link to CPSI report	We have produced a complaints performance and service improvement report for 2023-24, which includes learning and improvement from complaints.
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	N/A	Our Executive director of communities and housing is accountable for our complaint handling.
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	N/A	Our Portfolio holder for housing is our Member Responsible for Complaints.

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	N/A	Our Portfolio holder for housing is our Member Responsible for Complaints and will ensure our Cabinet members receive regular information on complaints.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> • 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; • annual complaints performance and service improvement report. 	No	N/A	<p>Our Portfolio holder for housing is our Member Responsible for Complaints and will ensure our Cabinet members receive regular information on complaints.</p> <p>Due to the general election being called, we are not able to present the annual report to our Cabinet by the due date of 30 June. The report will be presented at the next Cabinet meeting in July 2024 and their response will be published at that time.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> • 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. 	No	N/A	We do not currently have a standard objective in relation to complaint handling but will implement this during 2024-25.