#### **Appendix A: Self-assessment form**

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

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

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

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

### **Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  '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.'	Yes	https://www.wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	This is clearly defined on our website and within the Corporate Complaints Policy. A link to the complaints policy is on the website.
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	https://www.wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	As above. Our complaints definition states that a complaint is 'an expression of dissatisfaction' therefore a resident does not have to use the word 'complaint'. Complaints by a third party or representative are handled in line with our complaints policy, but consent to act on a residents' behalf must be evidenced.
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	Yes	https://www.wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	The distinction between a service request and complaint is set out within our Corporate Complaints

	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.		The Housing Corporate Complaints Policy is attached in appendix 1.	Policy which is on the website.
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	This is covered in our Staff Guidance on Complaints Handling which is attached in <u>appendix 2</u> .	See Section 2 of the staff guidance. When a complainant is notified of their service request being dealt with as such, if a complainant then seeks to escalate to a stage 1 complaint, even if they are awaiting their service request response, we would at that point escalate their complaint to stage 1.
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	At the end of the Annual Resident Perception Survey conducted by BMG, an external company, residents are advised of how to make a complaint if they are dissatisfied. Furthermore, the complaints teams are always aware that complaints come in through a variety of methods. We accept

	complaints through emails,
	telephone calls and
	through our complaints
	form. It does not have to
	be any specific way.
	Complainants that ask for
	guidance on how to make
	a complaint are guided
	through our Wandsworth
	complaints page and
	colleagues clearly explain
	that it does not have to be
	on the form on the website.

#### **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	See 1.5 – this is covered in staff guidance on complaints handling	Section 2 of staff guidance. All complaints are considered on a case-by- case basis and colleagues are aware that they must provide a valid reason if the Council does not wish to accept a complaint.  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Yes	See 1.4 and 1.5 – this is covered in the both the Housing Corporate Complaints Policy and the staff guidance on complaints handling	Section 2 of the staff guidance and Section 5 of the Corporate Complaints Policy.

	<ul> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>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.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/ and see 1.4 for Corporate Complaints Policy and 1.5 for staff guidance	This is stated in Section 10 of the Corporate Complaints Policy, Section 2 of the staff guidance and on our website - the Council will take due consideration of extenuating circumstances in the cases of those that may require it.
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	Staff guidance on complaints handling – see 1.5	Refer to 2.2. Set out in Section 2 (2.3) of the complaints handling guidance.

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Staff guidance on complaints handling – see 1.5	This is in Section 3 of the staff guidance.
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## **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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/ See 1.4 for Corporate Complaints Policy and 1.5 for Staff Guidance	Our complaints policy (Section 14) signposts residents to advocacy and sets out that the Council will make reasonable adjustments (Section 15) as required to ensure that residents are able to complain. We will also take complaints in any format to ensure that all residents are able to make a complaint. The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling. Accessibility is also covered in the staff guidance Section 14.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware	Yes	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	Refer to 1.6 and 3.1.

	of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.			
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/ Annual Complaint Reports are published on our complaints webpages to promote transparency and accessibility See 1.4 for Corporate Complaints Policy and 1.5 for Staff Guidance	We always take complaints as an opportunity to learn and reflect on our processes which is set out in our publicly available annual complaint reports. Section 2 of the Corporate Complaints Policy sets out our positive approach to complaints. Our complaint values are also set out in Section 1 of the staff guidance on handling complaints.  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling
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	Yes	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/ See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	Richmond and Wandsworth Council encourages complaints in any format. This is set out in Section 15 of the Corporate Complaints Policy, our complaints webpages and Section 14 of the staff guidance on

	must also be published on the landlord's website.			complaints handling. Officers are regularly briefed and reminded that they should accept complaints by phone or in person as well as via email, letter and online forms. There is no need to tell callers they must log a complaint via the online form or in writing. When requests are made for a more suitable format, i.e. in an email due to a visual impairment, this is considered and applied accordingly.
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	See 1.4 Corporate Complaints Policy	This is explained in Section 15 of the Corporate Complaints Policy.
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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	Refer to 3.1.
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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	This information is on our complaints webpage, within our Corporate Complaints Policy, within staff guidance on complaints handing and on complaint

	See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling Stage 1 and 2 templates.  Homelife 104 – March 2025 edition	acknowledgment and response templates at stage 1 and responses at stage 2.  In addition, Homelife is a resident newsletter circulated regularly which provides details on how to make a complaint and take it forward with the Ombudsman should they require it.
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**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	The Corporate and Statutory Complaints Team are based within the Chief Executive's Department and overseen by the Statutory & Corporate Complaints Manager who is the organisational strategic lead for complaints. Within this team, the Corporate & Ombudsman Complaints Manager acts as the Ombudsman link officer	Stage 1 complaints are handled by the Housing Business Support Hubs but supported by the Central Complaints Team. The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.
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	The Statutory and Corporate Complaints Manager sits within the same reporting structure as the Council's Monitoring Officer. The Complaints Manager and their team regularly attend Senior Management Team meetings to provide complaints performance updates, works closely with senior managers and directorate complaint leads to provide advice on resolving complaints and presents annual complaint reports to Members	As above.

			4l	
			through the Councils committee	
			process	
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	The central Complaints Team offer regular complaint training to teams, complaints is now on mandatory staff induction and see 1.5 for staff guidance on complaints handling  Homelife 104 – March 2025 edition  Complaint Handling Focus Group	In addition all new managers are trained by a colleague in the Housing Business Support team when they start in the organisation to ensure complaints are at the front of their mind. With all complaints when upheld, partially upheld, or even not upheld, the Housing directorate take the time to reflect and learn lessons where we uphold or partially uphold our complaints. Senior managers are communicated the Ombudsman press releases by the Corporate Complaints team too, in which they can share with colleagues if they wish. The Complaints Manager regularly attends Senior Management Team meetings to update on complaints performance, themes and learning and the Senior Management Team are updated quarterly

	on stats of complaints, service requests, topics of complaint and Housing Ombudsman severe maladministration cases.
	Learning has also been shared with the wider residents in our March edition of Homelife. In addition, we held a complaints focus group in February 2025, the findings of which were published on the Council's website with short, medium and long term actions agreed.

**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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	Both Wandsworth and Richmond Council share the same Corporate Complaints Policy and the guidance is not different in any way.
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	Yes	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	There are only two stages to the Corporate Complaints Policy.

	stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			
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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	As above.
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	Co-op complaint policy ( <u>appendix 3</u> )	For Co-operatives that manage properties on behalf of Wandsworth Council, they are expected to respond at stage 1 and offer a stage 2 escalation to the Council. This is also set out in section 7 of the Corporate Complaints Policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Co-op complaint policy	As above. It is our responsibility for ensuring that the Co-operatives follow the procedure.
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	See 1.5 for staff guidance on complaints handling	See section 4 (4.2 and 4.3) of the staff guidance.

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	See 1.5 for staff guidance on complaints handling and on Stage 1 and 2 acknowledgement templates see 3.7	In our acknowledgements we summarise their complaints and what they are relating to. In the case when it is not clear, colleagues need to correspond with the complainant to identify where it is not clear.
5.8	At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and  d. consider all relevant information and evidence carefully.	Yes	See 1.5 for staff guidance on complaints handling	This is covered in Section 3 (3.4) of the staff guidance on complaints handling. The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	See 1.5 for staff guidance on complaints handling	See section 4 (4.5) and Section 5 (5.7) of the staff guidance on complaints handling. This sets out that the complainant should be contacted if the response will need to be extended to the 20 working day timescale allowed within the HO Code for more complex

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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/ See 1.4 Corporate Complaints Policy and 1.5 staff guidance on handling complaints	complaints or if complaint responses for any such reason cannot be responded to on time.  Our complaints policy signposts residents to advocacy and sets out that the Council will make reasonable adjustments as required to ensure that residents are able to complain. We will also take complaints in any format to ensure that all residents are able to make a complaint. All staff in the Corporate Complaints Team are fully trained to deal with complaints in this way. The Team also provides complaints training to internal departments, ensuring that the complaints procedure is accessible.  This is also covered in Section 3 (3.1) and Section 14 of the staff guidance.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has	Yes	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	Refer to section 2. Section 2 of the staff guidance on handling

	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.		1.5 staff guidance on handling complaints	complaints sets out valid exemptions from the Corporate Complaints 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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See Annual Corporate Complaints Report on the website	There are two stages to Richmond and Wandsworth Council's corporate complaints procedure (stage 1 and stage 2). The Departments keep an audit trail of all emails/records of stage 1 complaints and provides statistics to the central Complaints Team on a quarterly basis. The Central Complaints Team keep records for all complaints that escalate to stage 2. Complaint files include all correspondence and relevant supporting documentation. Data is used to produce the Annual Complaint Reports.
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	Yes	See 1.5 staff guidance on complaints handling.  https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/	As part of the complaint investigation and the learning element, managers review outcomes and implement remedies as appropriate (such as an

	at any stage of the complaints process without the need for escalation.		See Annual Corporate Complaints Report on the website	apology, action to remedy the issue e.g. arrange a repair, a compensatory payment, staff training, amendment to a procedure etc.). Under our complaints procedure, learning has been identified for all upheld or partially upheld complaints, and, if applicable, service improvements put in place. This learning is included in the Annual Report to Committee.  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.
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	See Unreasonable Complainant Behaviour policy (appendix 4) and 1.5 for staff guidance on handling complaints	The Unreasonable Complainant Behaviour Policy sets out that any restrictions on communication will follow the guidance in the Council's Equalities Policy. Also, the Council has a high level bi-monthly panel

				meeting which reviews decisions on restrictions made due to unreasonable behaviour to ensure they have been made fairly and reviewed regularly.
				This is also covered in the staff guidance on complaints handling – see section 8.
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	See 5.14	As above in 5.14.

## **Section 6: Complaints Stages**

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	As of 1st April 2023, all complaints that fall under the HO's jurisdiction will be responded to within 10 working days, and the complainant will be kept informed if the response will need to be extended to the 20 working day timescale allowed within the HO Code for more complex complaints.  This is covered in Section 3 (3.2) of the staff guidance on complaints handling.  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.

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.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling.	The Council's corporate target is to acknowledge all stage 1 and stage 2 complaints within two working days. This is set out on the website, within the corporate complaints policy, and in staff guidance on complaints handling
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	Refer to 6.1 and 6.2.
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	Refer to 6.1 and 6.2.
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	Refer to 6.1. We always provide the details of the Housing Ombudsman in all stage 1 acknowledgements. This is set out in the staff guidance on complaints

				handling Section 4 (4.5) and Section 5 (5.7)
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	Our complaints procedure sets clear timescales for responding to complaints. Officers are expected, in line with good complaints practice, to track any actions agreed as part of the complaint after the response has been sent.
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	See 3.7 for Stage 1 and 2 templates. ( <u>Appendices 5 and 6</u> ).	The corporate complaint templates provide a framework to ensure that complaint responses address all points raised in the complaint and reference any relevant policy and law. These templates are available on the internal intranet and accessible by all staff, alongside the guidance on effective complaints handling.
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	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  1.5 staff guidance on complaints handling	This is set out in the staff guidance on complaints handling in Section 4 (4.10)

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:     a. the complaint stage;     b. the complaint definition;     c. the decision on the complaint;     d. the reasons for any decisions made;     e. the details of any remedy offered to put things right;     f. details of any outstanding actions; and     g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	See 3.7 for Stage 1 template.	Similarly to 6.7. We have a corporate complaint template that covers all of these points effectively. These templates are available on the internal intranet and accessible by all staff, alongside the guidance on effective complaints handling and remedy offers.

# 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	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/  See 1.4 Corporate Complaints Policy	As per the Council's complaints procedure, all complainants who receive a stage 1 response have the opportunity to escalate to stage 2 if they remain unhappy or dissatisfied with their response. We only

				have two stages in our
				procedure.
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	The Council's corporate target is to acknowledge all stage 1 and stage 2 complaints within two working days. This is set out in the Corporate Complaints Policy and staff guidance on complaints handling Section 5 (5.4)
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	See 1.5 staff guidance on complaints handling	If a complainant requests a stage 2 review, we do not require them to explain their reasoning and this is set out in Section 5 (5.2) of the staff guidance on complaints handling. The Business Support Team or Central Complaints Team will contact complainants if there is any uncertainty as to why they remain unhappy as part of their stage 2 complaint.  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.5 staff guidance on handling complaints	A senior manager will review the stage 1 response, and then write to them with the decision for stage 2. The staff guidance on handling complaints Section 5 (5.3) sets out that a senior manager will conduct the stage 2 review.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling.	This is detailed in the Corporate Complaints Policy and staff guidance on complaints handling.
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	See 1.5 staff guidance on handling complaints,	This is covered in Section 5 (5.7) of the staff guidance on handling complaints. Also, when a case is complex and requires further time, the Business Support Team will liaise with the Corporate Complaints Team to inform the complainant of the delay and explain the reasoning for it.
6.16	When an organisation informs a resident about an extension to these	Yes	https://wandsworth.gov.uk/the- council/have-your-say/make-a- complaint/	This is set out in Section 5 (5.7).

	timescales, they must be provided with the contact details of the Ombudsman.		See 1.5 staff guidance on handling complaints.	The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.
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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy	As per 6.6. Our complaints procedure sets clear timescales for responding to complaints. Officers are expected, in line with good complaints practice, to track any actions agreed as part of the complaint after the response has been sent.
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	See 3.7 for stage 1 and 2 templates.	As per 6.7. The corporate complaint templates provide a framework to ensure that complaint responses address all points raised in the complaint and reference any relevant policy and law. These templates are available on the internal intranet and accessible by all staff, alongside the guidance on effective complaints handling.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage;  b. the complaint definition;  c. the decision on the complaint;  d. the reasons for any decisions made;  e. the details of any remedy offered to put things right;  f. details of any outstanding actions; and  g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	See 3.7 for Stage 2 template	As per 6.9. We have a corporate complaint template that covers all of these points effectively. These templates are available on the internal intranet and accessible by all staff, alongside the guidance on effective complaints handling and remedy offers.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See 1.4 Corporate Complaints Policy and 1.5 staff guidance on complaints handling	A Senior Member of staff reviews the stage 2 as per our procedure and all suitable staff are interviewed as part of the review of the Stage 1 investigation. Stage 2 responses are clear that this is the final response.

## **Section 7: Putting things right**

Code	Codo requirement	Comply:	Evidonos	Commentary / explanation
provision	Code requirement	Yes / No	Evidence	Commentary / explanation

7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These can include:	Yes	See 1.5 staff guidance on complaints handling.	Refer to 5.13. Section 1 (1.4) and Section 11 (11.2) of the staff guidance sets out these measures to put things right when a complaint is upheld  The Central Complaints Team also provide comprehensive support and guidance and regular staff training on complaints handling.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	See 1.5 staff guidance on complaints handling	As above point 7.1.
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	See 1.5 staff guidance on complaints handling	As 7.1. We also ensure that in our responses that any remedy is clearly stated to the complainant in how it is processed and when (if applicable). Set out in staff guidance on complaints handling Section 11.

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	See 1.5 staff guidance on complaints handling	As per 7.1, this is set out in staff guidance on complaints handling Section 11, 11.4. This is based on the Ombudsman's guidance on deciding the appropriate remedies.
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See Annual Corporate Complaints Report on the website	The Statutory and Corporate Complaints Manager in Richmond and Wandsworth produces an Annual Report that is approved by the Council's Monitoring Officer before final review and agreement by Members at the Cabinet/Scrutiny Committee meetings.

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://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See Annual Corporate Complaints Report on the website	As 8.1.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	Previous self-assessment.	We carried out a self- assessment last year in 2024. We are carrying out this self-assessment for 2025. The next self- assessment will be carried out in 2026.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	N/A	If needed, we can carry out a review.
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	We are fully aware of our responsibilities to inform the Ombudsman in such circumstances and provisions are in place within our business continuity planning	The Corporate Complaints team would act as the responsible team in this type of event, and they are the link between the Council and the Ombudsman.

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	https://wandsworth.gov.uk/the-council/have-your-say/make-a-complaint/  See Annual Corporate Complaints Report on the website	As part of the complaint investigation and the learning element, managers review outcomes and implement remedies as appropriate (such as an apology, action to remedy the issue e.g. arrange a repair, a compensatory payment, staff training, amendment to a procedure etc.). Under our complaints procedure, learning has been identified for all upheld or partially upheld complaints, and, if applicable, service improvements put in place. This service improvement learning can be included in the Annual Report to Committee.  The Central Complaints Team also provide comprehensive support and guidance and regular staff

				training on complaints
				handling
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	Refer to point 4.3.	Refer to point 4.3. As well as the intelligence provided through the Annual Complaints Report, the Complaints Manager attends Senior Management Teams on a quarterly basis to provide complaint performance updates and report on themes and risks. They also highlight any system issues or risks to the Council's Monitoring Officer to inform service improvement. In addition to regular complaints training for services, on 6th February 2025 the Complaints the Statutory and Corporate Complaints Manager undertook a session with the Council's 'Think Bigger Network'. This focused on 'storytelling from complaints' and brought to life the experiences of people who had made complaints where they had been direct service improvements.

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	Browse Meetings, 2000 - Wandsworth Borough Council - Annual committee reports  Housing performance and statistics - Wandsworth Borough Council - Annual Area Housing Panel Performance Reports.  Homelife letter in 3.7.	The complainant is informed as are any other necessary parties. We have the facility to share these lessons e.g. through the Homelife newsletter/ housing panels/ Annual Reports etc.  Complaints data is provided in the Annual Report to residents published in Homelife and in the Annual Report presented to the Area Housing Panels. The Annual Complaints Report submitted to Committee includes anonymised examples of complaints where learning has led to service improvements.
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	The Statutory and Corporate Complaints Manager is the organisations strategic lead for complaints	The Statutory and Corporate Complaints Manager is appointed who maintains a regular presence in directorates to support a positive culture of complaints. They also assess themes and trends, assess risks and produce an Annual Report that is approved by the Council's Monitoring Officer before

				final review and agreement by Members at the Committee and Executive meetings.
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	The Cabinet/Overview and Scrutiny Committee receive the Annual Complaints Report. The Statutory and Corporate Complaints Manager works in close liaison with the Monitoring Officer, who in conjunction with the relevant director briefs lead members on complaint themes, risks and issues as and when required.	Refer to 4.1 and 9.3.
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	As 9.5	Also see 9.5

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and  d. annual complaints performance and service improvement report.	Yes	The Complaints manager will take six monthly performance reports to Director's Board which will be shared with the MRC by the relevant lead director	See 9.5
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third parties that reflects the need to:  a. have a collaborative and co- operative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	9.8	a. have a collaborative and co- operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional
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Put people first

- Whatever you're doing, ask: how does this make things better for our residents?
- Treat residents as individuals not statistics...
- Be kind. Put yourself in the other person's shoes
- Make the effort to hear people out and bring people with you

Lead by example

No

- Say what you mean and do what you say
- Be positive. Bring your energy and idealism to everything you do
- Take responsibility and see things through
- Connect better
- Be friendly and approachable and communicate clearly

All new Job descriptions for all council roles at all levels now have complaint handling responsibilities included in under generic responsibilities to promote a positive organisational commitment to effective complaints handling.

We have organisational values, and all of these centred on ensuring that where there are concerns/complaints from residents that these are raised and dealt with effectively, for example Putting People First. At every appraisal cycle we are required to demonstrate our performance against individual targets by reference to the values