

Appendix A: Self-assessment form

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

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

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

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

The City of Wolverhampton is a stock holding local authority; however, the management of its housing stock is carried out on our behalf by our managing agents. There are four managing agents, an arms-length management organisation (ALMO) and three tenant management organisations (TMO). Each of our housing managing agents have their own complaints policies and procedures and each of their complaints policies can be found via City of Wolverhampton Council's [Housing Management Complaints page](#) in addition to their own websites. It should however be noted that currently the housing management functions of one of our TMOs is being carried out by our ALMO, this includes complaint handling.

This self-assessment document has been produced collaboratively with our managing agents and represents an assessment against the Housing Ombudsman's Complaint Handling Code across the whole city's council owned housing stock. For ease of access, we have included the links to each Managing Agent's Complaints Policies below. We will also use the colour coding outlined below for specifying information about each individual managing agent:

[Bushbury Hill Estate Management Board \(BHEMB\) in Purple](#)

[Dovecotes Tenant Management Organisation \(DTMO\) in blue](#)

[Wolverhampton Homes ALMO \(WH\) in orange](#)

[Bushbury Hill EMB Complaints Policy](#)

[Dovecotes TMO Complaints Policy](#)

[Wolverhampton Homes Complaints Policy](#)

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>BHEMB’s Complaints Policy</p> <p>DTMO Complaints Policy</p> <p>WH Complaints Policy</p>	
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>Detailed in BHEMB’s Complaints Policy section 3.1:</p> <p>“A tenant does not have to use the word ‘complaint’ for it to be treated as such. When a tenant expresses dissatisfaction, we will ask the tenant if they would like to raise a complaint.”</p> <p>DTMO Complaints Policy states: ‘A request for service is not a complaint; complaints are about situations when the tenant making the complaint thinks that things have gone wrong, this will not have to be termed by the customer as a complaint but will be dealt with in line</p>	

			<p>with the organisation's Complaints Policy. The organisation's 'Reasonable Adjustment Policy' will apply where a complaint is received via a third party.'</p> <p>WH aim to resolve expressions of dissatisfaction quickly, wherever possible at first point of contact with a customer, either by their customer services team or by the relevant service area. If the matter cannot be resolved quickly, we follow a two-stage complaints process detailed as Stage 1 and Stage 2.</p>	
1.4	<p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>	Yes	<p><u>BHEMB's Complaints Policy</u> section 3.4: "There may be times when we are unaware of an issue, and it is the first time a tenant has reported it to us. This is called a service request, which is defined as: "a request from a tenant to the landlord, requiring action to be taken to put something right."</p> <p><u>DTMO Complaints Policy</u> states:</p>	

			<p>A request for service is not a complaint; complaints are about situations when the tenant making the complaint thinks that things have gone wrong, this will not have to be termed by the customer as a complaint but will be dealt with in line with the organisations Complaints Policy. DTMO record all requests for service and respond in line with the time scales already set out within the complaints policy.</p> <p><u>WH Complaints Policy section 2.1 states:</u> ‘This differs from a service request which is where the customer is requesting a service, rather than making a complaint’.</p>	
1.5	<p>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.</p>	Yes	<p><u>BHEMB’s Complaints Policy section 3.4 states:</u> “If a tenant then expresses dissatisfaction with the response to their service request, this will then enter the complaints process.”</p> <p>At DTMO, all complaints and service requests are recorded by the organisation. Staff are</p>	

			<p>trained regularly with mentoring in place to ensure that the complaints process is followed.</p> <p>WH Complaints Policy section 2.1 states: ‘We will raise a complaint where a customer raises dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. We will not stop our efforts to address the service request if the customer complains’.</p>	
1.6	<p>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.</p>	Yes	<p>At BHEMB, when actions arise from surveys, tenants are contacted / visited and at this point have the opportunity to make a complaint.</p> <p>Dovecotes TMO operates from a local office that is open to the public. We communicate widely with tenants through newsletters, AGM’s and events. In all interactions with tenants, we seek feedback and suggestions, all tenants are advised of their right to make a complaint.</p>	<p>The City of Wolverhampton Council engages an independent company to carry out tenant satisfaction surveys. Any reports of dissatisfaction are flagged and reported to the relevant managing agent to follow up with the tenant.</p>

		<p>The TMO also hold an external scrutiny group, this consists of tenants living on the estate.</p> <p><u>WH Complaints Policy</u> details that: 'An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to. Where we ask for wider feedback about our services, we will also provide details of how residents can complain'.</p>	
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>BHEMB's Complaints Policy section 3.2 clearly states what we don't consider a complaint. These are the only circumstance when we wouldn't accept one and our reasoning would be clear in the letter to the tenant.</p> <p>At DTMO, each complaint will be assessed by the officer responsible. If the information is determined not to be a complaint this will be dealt with as a request for service and logged accordingly and the tenant notified. DTMO will only not accept a complaint if it is vexatious.</p> <p>For WH this is detailed in Complaints Policy Section 4: 'We will accept a complaint unless there is a valid reason not to do so. There are certain types of complaints that cannot be</p>	

			covered by this policy....' (listed in Section 4.1).	
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	<p>BHEMB's Complaints Policy section 3.2 has clear and fair details of what we don't consider a complaint.</p> <p>As detailed in DTMO's Complaints Policy only vexatious complaints will be excluded/refused.</p> <p>Detailed in WH Complaints Policy Section 4 'there are certain types of complaints that are not covered by this policy....' (listed in Section 4.1)</p>	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints</p>	No	<p>BHEMB's Complaints Policy</p>	<p>The DTMO Complaints Policy does not restrict a period for which a complaint can be made. The TMO will consider all complaints regardless of timescale however, the policy will be reviewed to reflect this recommendation.</p>

	made outside this time limit where there are good reasons to do so.			<u>WH Complaints Policy</u> Currently states that complaints will not be accepted where the issue took place more than 6 months ago, this has been reviewed and updated to reflect the complaint handling code and will be amended in their policy imminently.
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		
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	At BHEMB, this can be identified by complaints records, we have evidence of consideration of a complaint which would fall outside the policy.	

			<p>For DTMO, this is built into the officer guidance and training for those responding to complaints.</p> <p>WH take an individual approach to considering all complaints on their own merit.</p>	
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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	<p>BHEMB Complaints Policy (Section 5 – How to make a complaint), website, annual report to tenants, and their Reasonable Adjustment Policy</p> <p>All DTMO staff attended mandatory training on equalities and reasonable adjustment December 2023. Details are available on our website www.dovecotestmo.com</p> <p>Complaints can be made in person at the TMO office, via the phone or email dovecotes.tmo@wolverhampton.gov.uk</p>	

			<p>Detailed in WH Complaints Policy Section 5 – how to make a complaint. This includes a number of access points for a complaint to be made.</p>	
3.2	<p>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.</p>	Yes	<p>BHEMB have a clear process and all staff receive training.</p> <p>All DTMO staff are trained on handling complaints and have access to the complaints records.</p> <p>Complaints training included in mandatory all-staff WH eLearning. New starter / refresher training ongoing.</p>	
3.3	<p>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.</p>	Yes	<p>BHEMB Section 1.4 of their Complaints Policy.</p> <p>DTMO welcome and value the opportunity to address concerns.</p> <p>Wolverhampton Homes considers all complaints as an opportunity for learning to make improvements to services.</p> <p>Learning from complaints meetings held with Senior Leadership team to discuss themes and improvements.</p>	

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	<p>BHEMB website has an accessibility feature. Translation and language services are available via CWC.</p> <p>Dovecotes TMO Complaints Policy</p> <p>For WH tenants, this is detailed in our Complaints Policy and our website. The company website has an accessibility tool embedded. Translation service is available for all staff to utilise to support complaint discussions.</p>	Each of our managing agents are compliant against accessibility requirements. Dovecotes TMO are currently working with the Council's web team to build accessibility tools into a refreshed website.
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	<p>BHEMB's Complaints Policy covers this in sections 1.8, 2.0 and 9.3a.</p> <p>DTMO Complaints Policy states: "The complaints policy and procedure will be publicised within the office, at the start of the new tenancies, on the organisations website and a copy will be always available in the office or by post on request."</p> <p>This is detailed in section 5 of WH's Complaints Policy. Our website link is detailed in section 5.1 of our policy.</p>	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their	Yes	This is covered by section 4 and section 6.2 of BHEMB's Complaints Policy .	

	<p>behalf, and to be represented or accompanied at any meeting with the landlord.</p>		<p>DTMO Complaints Policy states: “The complaints policy and procedure will be publicised within the office, at the start of the new tenancies, on the organisations website and a copy will be always available in the office or by post on request.”</p> <p>This is detailed in WH’s Complaints Policy. Section 3.2 and 5.2 of our policy confirms this.</p>	
3.7	<p>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.</p>	Yes	<p>This is included in Section 7 of BHEMB’s Complaints Policy.</p> <p>DTMO’s Complaints Policy details this.</p> <p>This is detailed in WH’s Complaints Policy and in our Stage 2 complaint responses. Section 8 of the policy reinforces this.</p>	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>At BHEMB, the role is currently carried out by Business Services Support Officer.</p> <p>Evidenced in DTMO's Complaints Policy as the TMO Manager or deputy.</p> <p>At WH, the Customer Experience Manager and Resolution Team are responsible for complaints handling.</p> <p>The City of Wolverhampton Council's Customer Engagement Manager acts on our behalf in liaison with the Housing Ombudsman.</p>	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<p>At BHEMB, the role is currently carried out by Business Services Support Officer.</p> <p>At DTMO, a senior officer is authorised to deal with complaints who has the autonomy in their role with</p>	

			<p>support from the Chairperson of the TMO if required.</p> <p>This is outlined in the complaints policy in section 1 of WH's Complaints Policy</p>	
4.3	<p>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</p>	Yes	<p>A BHEMB, Staff and Board have received training both on generic complaints handling and our policy and process. See section 10 of BHEMB's Complaints Policy.</p> <p>All DTMO staff are trained on handling complaints.</p> <p>WH Complaints training is prioritised for all staff.</p> <p>Complaints training covers the skills and knowledge required to handle complaints effectively, such as communication, empathy, investigation, resolution, and escalation. The training also emphasises the importance of learning from complaints and using feedback to improve service delivery and tenant satisfaction.</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	BHEMB Complaints Policy Dovecotes TMO Complaints Policy WH's Complaints Policy section 1.2 confirms this.	
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	BHEMB has a two stage complaints procedure. At DTMO, a two stage complaints process is in place. WH's Complaints Policy section 6.1 confirms this.	
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		
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	Yes		

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		
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	<p>BHEMB Complaints Policy</p> <p>DTMO This is detailed within the officer guidance for dealing with complaints and reference documents.</p> <p>This is clearly set out in WH’s complaint responses at Stage 1 and Stage 2. Our communication with customers ensures that we are clear on the details of a complaint and this is confirmed in our acknowledgment to the customer.</p>	
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	<p>BHEMB – As above</p> <p>DTMO This is detailed within the officer guidance for dealing with complaints and reference documents.</p>	

			WH's Complaints Policy	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p>BHEMB staff training.</p> <p>This is detailed within the officer guidance for dealing with complaints and reference documents.</p> <p>This is detailed in WH's communication and acknowledgements to customers.</p> <p>WH use a template response to customers to ensure this is clearly outlined.</p>	
5.9	<p>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.</p>	Yes	<p>BHEMB Complaints Policy states that appropriate updates will be provided to the tenant.</p> <p>The primary objective of DTMO's Complaints Policy is to resolve complaints within agreed timescales. If required, an extension of 10 working days can be applied with the agreement of the complainant. Requests must be approved by the Chief Officer at Stage 1 and the Chair of the Board at Stage 2. All extensions must be</p>	

			evidenced and recorded on the complaint monitoring log. Section 7 of WH's Complaints Policy outlines this.	
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	Evidenced in section 8 of BHEMB's Complaints Policy . There is a Reasonable Adjustment Policy that sits alongside DTMO's Complaints Policy . A log of any reasonable adjustments has been created and sits within the complaints monitoring log. Section 7.1 of WH's Complaints Policy confirms this.	
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	Evidenced in BHEMB Complaints Policy and Complaints Records As detailed in DTMO's Complaints Policy only vexatious complaints will be excluded/refused. WH's Complaints Policy	
5.12	A full record must be kept of the complaint, and the outcomes at each	Yes		

	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.			
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		
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	BHEMB Complaints Policy – Vexatious complaints (section 3.3 policy) We have a code of conduct and staff related behaviour policies that are followed by all members of the TMO. Section 10 of WH’s Complaints Policy confirms this.	
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	BHEMB Complaints Policy Equality-and-Diversity-Policy-and-Procedures.pdf (dovecotestmo.com)	

			Section 10 of WH's Complaints Policy outlines this.	
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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	<p>BHEMB Complaints Policy section 6.1 and complaints records.</p> <p>As detailed in DTMO's Complaints Policy.</p> <p>WH aim to resolve the majority of complaints at Stage 1 as outlined in section 7.1 of WH's Complaints Policy. Our Customer Resolution Officers act as a single point of contact for the customer to provide support during the complaints process and to ensure communication is as clear as possible.</p>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u>	Yes	<p>BHEMB Complaints Policy section 6.1</p> <p>DTMO - As above</p>	

	<u>working days of the complaint being received.</u>		As outlined in section 7 of WH's Complaints Policy.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	BHEMB Complaints Policy DTMO's Complaints Policy. As outlined in section 7 of WH's Complaints Policy.	
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	BHEMB complaints records / correspondence DTMO - As above All extensions must be agreed with the complainant and the Chair of the Board. All evidence of extension is stored within the complaint file. As outlined in section 7 of WH's Complaints Policy.	
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	BHEMB Complaints Policy DTMO's Complaints Policy. WH's Complaints Policy.	
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	Yes		

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
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		
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	BHEMB Complaints Policy DTMO's Complaints Policy. WH's Complaints Policy.	
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; 	Yes	BHEMB Complaints Policy DTMO's Complaints Policy. WH's Complaints Policy	

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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	<p>BHEMB Complaints Policy</p> <p>As detailed in DTMO's Complaints Policy</p> <p>Section 7.2 of WH's Complaints Policy confirms this.</p>	
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	<p>BHEMB Complaints Policy</p> <p>As detailed in DTMO's Complaints Policy</p> <p>Section 7.2 of WH's Complaints Policy this.</p>	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes		

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>At BHEMB – Panel of 3, 1 external panel member (normally WH or CWC representative)</p> <p>As detailed in DTMO's Complaints Policy</p> <p>WH's Stage 2 complaint responses are overseen by the relevant Head of Service and signed off by a director.</p>	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<p>BHEMB Complaints Policy</p> <p>As detailed in DTMO's Complaints Policy</p> <p>Section 7.2 of WH's Complaints Policy confirms this.</p>	
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	Yes	<p>BHEMB Complaints Policy</p> <p>All extensions must be agreed with the complainant and the Chair of DTMO Board. All</p>	

	20 working days without good reason, and the reason(s) must be clearly explained to the resident.		evidence of extension is stored within the complaint file. Section 7.2 of WH's Complaints Policy confirms this.	
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		
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	All TMO staff are trained on handling complaints and have access to the complaints folder and monitoring log. Guidance documents are available to ensure all areas of the complaint are responded to appropriately. Section 7.2 of WH's Complaints Policy confirms this.	
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		
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint;	Yes	BHEMB Complaints Policy As detailed in DTMO's Complaints Policy	

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>		WH's Complaints Policy	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>Stage 2 will be responded to by the most senior member of staff or the Chairperson of Dovecotes TMO.</p> <p>At WH, a 'case conference' approach is taken, involving the relevant Head of Service and Director.</p> <p>Each Stage 2 responses is signed off by a Director.</p>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or	Yes	BHEMB staff training.	

	<p>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. 		<p>All TMO staff are trained on handling complaints and have access to the complaints folder and monitoring log. Guidance documents are available to ensure all areas of the complaint are responded to appropriately.</p> <p>Section 6.1 of WH's Complaints Policy confirms this.</p>	
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>BHEMB staff training.</p> <p>All TMO staff are trained on handling complaints and have access to the complaints folder and monitoring log. Guidance documents are available to ensure all areas of the complaint are responded to appropriately.</p> <p>Section 6.1 & 13 WH's Complaints Policy</p>	
7.3	<p>The remedy offer must clearly set out what will happen and by when, in</p>	Yes		

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>BHEMB staff training.</p> <p>All TMO staff are trained on handling complaints and have access to the complaints folder and monitoring log. Guidance documents are available to ensure all areas of the complaint are responded to appropriately.</p> <p>Section 13 WH's Complaints Policy</p>	

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: <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint 	No	<p>An annual report is compiled by both BHEMB and DTMO, which are scrutinised by each organisation's board, before being sent to the council.</p> <p>Wolverhampton Homes produce an Annual Report which is published on their website. This</p>	<p>All our managing agents have contributed to this self-assessment, which will be published on the council website.</p> <p>They each have existing mechanisms for reporting on complaints performance to their own boards.</p>

	<p>handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>		<p>includes a 'Learning From Complaints' section'.</p>	<p>The City of Wolverhampton Council take the learning from each of our managing agents and use this information to produce an overarching complaints performance and service improvement report that reflects service delivery to all our council tenants across the city. Due to time constraints, this has not yet completed our governance route and will be published once approved both by managing agents' boards, and the Council's scrutiny function. It is anticipated that this will be completed by September, at which time we will review and resubmit our self-assessment.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	No		As above.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		This is recognised and reviews are completed when required.
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		This is recognised and will form part of our procedures following any incident or where exceptional circumstances result in us being unable to comply with the Code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>BHEMB report to their Board where service improvements are identified.</p> <p>DTMO A 'Lessons Learned' document is created for each complaint and submitted to full board. Complaints are a standard agenda item at all full board meetings.</p> <p><u>WH's Complaints Policy</u> confirms at section 9.</p>	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>BHEMB report to their Board themes of complaints and where service improvements are identified.</p> <p>DTMO A 'Lessons Learned' document is created for each complaint and submitted to full board. Complaints are a standard agenda item at all full board meetings.</p>	

			<p>- Wolverhampton Homes provides regular and comprehensive training to all staff involved in complaint handling, to learn from complaints and use feedback to improve service delivery and tenant satisfaction.</p> <p>- Wolverhampton Homes uses the data and insights from complaint handling to identify and implement service improvements and share good practice across the organisation.</p>	
9.3	<p>Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.</p>	Yes	<p>Annual Report to Board & Annual report to tenants Updated BHEMB Complaints Policy (section 9 and 10)</p> <p>DTMO held a scrutiny panel focusing on complaints and creating a report with learning outcomes. This is displayed on the organisations website and shared with members at the Annual General Meeting</p> <p>Learnings from complaints are reported on WH's website, to our Communities and Service</p>	<p>City of Wolverhampton Council's City Housing Oversight Panel – a tenant scrutiny forum – receives reports on complaints handling performance, amalgamated from all our managing agents.</p>

			<p>Delivery Committee and to our Board.</p> <p>The Customer Involvement Panel review the complaints policy and procedure, the general complaints received and how learning is embedded.</p>	
9.4	<p>Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.</p>	Yes	<p>This is the designated to DTMO's Chief Officer as the most senior officer of the organisation.</p> <p>WH's Customer Experience Manager and Head of Business Services are accountable for this.</p>	
9.5	<p>In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').</p>	Yes	<p>In addition to the Cabinet Member for City Housing at the Council, WH have approached Board (in March 2024) to request a board member responsible for complaints who will be appointed at June board 2024.</p>	<p>The portfolio holder (Cabinet Member for City Housing) is the Member Responsible for Complaints.</p>
9.6	<p>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</p>	Yes	<p>Wolverhampton Homes will appoint a Member Review Committee (MRC) to oversee the complaint handling performance and report through the governance framework for CWC</p>	<p>The Cabinet Member for City Housing will receive regular reports and will present this information to the relevant scrutiny panel.</p>

	information and staff to perform this role and report on their findings.		and WH. The MRC will have access to monthly reports on the number, type, outcome, and satisfaction of complaints; will conduct quarterly audits of a sample of complaint cases; will engage with complainants and staff; and will report their findings and recommendations on a quarterly basis.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes		We are compliant against this section and intend to work closely with our managing agents to continue to improve in this area.
9.8	Landlords must have a standard objective in relation to complaint	Yes		

	<p>handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none">a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; andc. act within the professional standards for engaging with complaints as set by any relevant professional body.			
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