

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: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	City of London Housing Complaints Policy 3.1. (page 2): housing-complaints-policy-v4	The City of London Corporation’s Housing Complaints & Customer Feedback Team uses the Housing Ombudsman Service’s (HOS) definition of a complaint.
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	City of London Housing Complaints Policy 3.2. (Page 2) and 7.1. (Page 4): housing-complaints-policy-v4 Third Party Authorisation Form (Appendix 1) Housing Complaints Leaflet: housing-complaints-leaflet	Where the subject of feedback amounts to a complaint, even if the resident does not formally state they wish to make a complaint, it will be acknowledged and formally investigated/recorded as a complaint. Where the Housing Complaints and Customer Feedback Team are unsure whether the resident is raising a formal complaint or service request, they will query this with the resident directly and provide a copy of the

				<p>Housing Complaints Leaflet for information on the process.</p> <p>Third Party correspondence is reviewed and considered for formal complaint investigations if the subject amounts to such. In instances where a third party contacts the team on behalf of a resident, the Housing Complaints & Customer Feedback Team will request a signed Third Party Authorisation form ahead of formalising a complaint.</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>Housing Complaints & Customer Feedback Webpage: Housing complaints and customer feedback - City of London</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p> <p>Shorter Housing Complaints Leaflet: housing-complaints-leaflet-short-version</p>	<p>If the Housing Complaints & Customer Feedback are aware that an issue is being raised for the first time, they will refer the request to the appropriate division and inform the resident. Service requests through the Housing Complaints & Customer Feedback Team are monitored by the Team.</p> <p>The Housing Complaints & Customer Feedback Team</p>

				will request that the relevant team communicate directly with the resident raising the request but will monitor the case and act as a point of contact if the resident has any further queries or concerns.
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	Housing Complaints & Customer Feedback Webpage: Housing complaints and customer feedback - City of London	<p>If a service request progresses to a formal complaint, the service request will continue to be actioned alongside the formal complaint investigation.</p> <p>Actions arising, or continuing, from a complaint investigation are tracked and monitored by the Housing Complaints & Customer Feedback Team.</p>
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		As part of our Tenant Satisfaction Measures Surveys carried out, the team ensures that any service requests raised are passed on to the relevant Team Manager. Team Managers are made aware that any expression of dissatisfaction could amount

				to a complaint, and are asked to forward any information of residents who expressed dissatisfaction to the Housing Complaints and Customer Feedback Team to make contact.
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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>City of London Housing Complaints Policy 4.1. (Page 3): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p>	<p>If a request for a complaint is declined, the resident will be contacted with an explanation of the decision and any alternative options available to the resident. The Housing Complaints & Customer Feedback Team will refer to the Housing Complaints Policy where appropriate. Residents will be provided with details on how to contact the Housing Ombudsman Service if they remain dissatisfied.</p>

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve 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>City of London Housing Complaints Policy 4.1. (Page 3): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p>	<p>The Housing Complaints & Customer Feedback Team accepts complaints up to 12 months old but will apply discretion for complaints made outside of this timescale where there are appropriate reasons to do so.</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 made outside this time limit where there are good reasons to do so.</p>	Yes	<p>City of London Housing Complaints Policy 4.1. (Page 3): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p>	<p>From 1 April 2024, the Housing Complaints Team updated their procedure to ensure residents could raise complaints within 12 months of an issue occurring (and applying discretion in longer cases as stated above). The updated version of this policy was formally approved in July 2024.</p>

2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<p>City of London Housing Complaints Policy 4.1. (Page 3): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p>	<p>If a request for a complaint is declined, the resident will be contacted with an explanation of the decision and any alternative options available to the resident. The Housing Complaints & Customer Feedback Team will refer to the Housing Complaints Policy where appropriate. Residents will be provided with details on how to contact the Housing Ombudsman Service if they remain dissatisfied.</p> <p>If the Housing Ombudsman Service (HOS) determines that the exclusion was not fairly applied, the Housing Complaints & Customer Feedback Team will carry out a formal investigation.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p>City of London Housing Complaints Policy 4.1. (Page 3): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p>	<p>Exclusions are exceptional and are reviewed by a manager before an exclusion is issued. The Housing Complaints & Customer Feedback Team ensure that communications are maintained and individuals are clear on</p>

				alternative solutions or signposted to appropriate agencies. Each complaint raised is taken on its own merit.
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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>City of London Housing Complaints Policy 7.1. (Page 4): housing-complaints-policy-v4</p> <p>Shorter Complaints Leaflet: housing-complaints-leaflet-short-version</p> <p>Reasonable Adjustments Policy: reasonable-adjustment-policy</p>	<p>We provide a broad access to the Complaints Service. Residents can complain: Via email Telephone Call Letter In Person</p> <p>There are some circumstances where a member of the Housing Complaints & Customer Feedback Team may offer to visit or meet with the resident to discuss a complaint.</p> <p>The Housing Complaints & Customer Feedback Team regularly visit Estate Drop-Ins, and Complaints can be raised to any City of London Housing Officer and passed onto the Team.</p>

				<p>The Team taken into consideration the Equalities Act 2010 in communications with residents and consider reasonable adjustments where appropriate in the complaint investigation process.</p> <p>A simplified version of the Housing Complaints Leaflet was published in October 2024 to allow greater accessibility to information about the service.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	City of London Housing Complaints Policy 7.1. (Page 4): housing-complaints-policy-v4	<p>Managers in the Housing Division are trained on the Housing Complaints Process and teams are informed of this process. Staff are regularly reminded to pass any resident complaints on to the Housing Complaints & Customer Feedback Team.</p> <p>The Information, Performance and Quality Assurance Manager has attended Housing Team</p>

				<p>meetings to inform teams of the process.</p> <p>When a complaint is passed on to the Housing Complaints & Customer Feedback Team, the team will contact the resident to discuss and formalise their complaint.</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>City of London Housing Complaints Policy 7.1. (Page 4): housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p> <p>Housing Complaints & Customer Feedback Webpage: Housing complaints and customer feedback - City of London</p>	<p>The Housing Complaints Procedure is widely publicised. Copies of the Housing Complaints Leaflet are available at Estate Offices and on the website.</p> <p>Reminders of the process are regularly published in the residents @Home newsletter and magazine.</p> <p>The Housing Complaints & Customer Feedback Team regularly attend Estate Drop Ins to publicise the service.</p> <p>In November, an updated version of the Housing Complaints Leaflet was distributed across estates. There has been an increase</p>

				in the number of complaints received.
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>City of London Housing Complaints Policy: housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p> <p>Shorter Complaints Leaflet: housing-complaints-leaflet-short-version</p>	<p>The Housing Complaints Policy is clear and accessible. The Housing Complaints Leaflet is available on the Housing Complaints & Customer Feedback webpage and hard copies are also made available to residents.</p> <p>There is a shorter version of the leaflet which details the process, what will happen at each stage, and the timeframes for responding.</p>
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	City of London Housing Complaints Policy 7.2. (page 5): housing-complaints-policy-v4	This is detailed in section 7.2. of the Housing Complaints Policy. The updated version of this policy was published in July 2024.
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	Third Party Authorisation Form (Appendix 1)	Residents can be represented by third parties, advocates or representatives when making a complaint. The team request that a third-party authorisation form is filled out in this instance before any personal

				information relating to the complaint is shared. Any third party acting for, or supporting a resident is then included in all communications with the resident.
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	<p>City of London Housing Complaints Policy: housing-complaints-policy-v4</p> <p>Housing Complaints Leaflet: housing-complaints-leaflet</p> <p>Shorter Complaints Leaflet: housing-complaints-leaflet-short-version</p>	Information on how to access the Housing Ombudsman Service is included in all correspondence with residents at all stages of the complaints process.

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>Complaints Officer:</p> <p>Information, Performance & Quality Assurance Manager Community & Children's Services Housing Complaints & Customer Feedback Team Barbican Estate Office, 3 Lauderdale Place, London, EC2Y 8EN T: 0203 834 8967</p>	The Housing Division as a Housing Complaints & Customer Feedback Team managed by the Information, Performance and Quality Assurance Manager. The manager is responsible for complaint handling, including liaison with the Housing Ombudsman Service and providing information and reports to the governing body. The Housing Complaints & Customer Feedback Team are coordinate the handling of all complaints and provide reporting data to the Governing body.
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 Complaints Officer/Team have access to staff at all levels and ensure that issues are internally escalated where necessary to agree prompt resolutions.

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes		<p>The Housing Complaints and Customer Feedback Team have a weekly meeting with the Property Services Team. Relevant new starters are provided with access to guidance in complaints handling. This guidance details HOS requirements in complaints handling, alongside case studies.</p> <p>The HOS e-learning portal is shared with complaint handlers and the Complaints Handling Code is referenced in complaint communications with staff.</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	City of London Housing Complaints Policy point 1 (page 2) & point 7 (page 4): housing-complaints-policy-v4	There is a single policy in place which was reviewed in 2024 to ensure compliance with the Complaints Handling Code.

				Residents' complaints are an opportunity for the Housing Service to improve. Residents are treated fairly and equally in dealing with their complaints.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	City of London Housing Complaints Policy 7.3. (page 5): housing-complaints-policy-v4	Officers are reminded that there is not a 'stage 0' or 'informal' stage. When residents express dissatisfaction they are provided with the option to formalise their complaint.
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	City of London Housing Complaints Policy 7.3. (page 5-6): housing-complaints-policy-v4	The Housing Complaints Process at the City of London is a two-stage process in line with the Complaints Handling Code.
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	City of London Housing Complaints Policy 7.5. (page 7): housing-complaints-policy-v4	On some rare occasions, a third party may be assigned to investigate a complaint. They are required to adhere to the Housing Complaints Policy to ensure that the resident does not have to go through separate complaint procedures.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	City of London Housing Complaints Policy 7.5. (page 7): housing-complaints-policy-v4	Third parties are expected to adhere with the City of London's Housing

				Complaints Policy, which is compliant with the Housing Ombudsman's Complaints Handling Code.
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	Stage One / Two Complaint Response Templates (Appendix 2 & 3)	This is carried out. Complaints are summarised in the acknowledgement and further information is sought to clarify the complaint and the requested outcome if this isn't clear. Details of the Complaint are reiterated in the formal response.
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	City of London Housing Complaints Policy 1 & 4 (pages 2 & 3): housing-complaints-policy-v4	It is clearly stated in acknowledgements and complaints correspondence, what areas of the complaint are relevant for investigation under the Housing Complaints policy. For areas of a complaint that falls outside of the Housing Complaints remit, residents are sign-posted to other processes, departments and services.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; 	Yes	Investigation Guidance Template (Appendix 4)	The Complaint Handler (Investigating Officer) is expected to investigate a complaint impartially, independently, and

	<ul style="list-style-type: none"> 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. 			<p>confidentially (where possible). Guidance and advice are available from the City of London Housing Complaints team and on the complaints handling SharePoint site. This includes guidance on investigations, what to consider when carrying out an investigation, and how to communicate best practice. Training and briefings are delivered by the housing complaints team as required.</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>City of London Housing Complaints Policy 7.3. (page 6): housing-complaints-policy-v4</p>	<p>Residents are contacted in advance of the deadline, to update them on the investigation progress and to set a new date for the response, when the original deadline cannot be met.</p>
5.10	<p>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.</p>	Yes	<p>City of London Housing Complaints Policy 9. (page 9): housing-complaints-policy-v4</p> <p>Reasonable Adjustments Policy: reasonable-adjustment-policy</p>	<p>In accordance with the Equality Act 2010, reasonable adjustments are considered for all residents, and carried out where appropriate.</p>

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	City of London Housing Complaints Policy 7.3. (page 6): housing-complaints-policy-v4	We rarely refuse to escalate a complaint. Where complaints are not escalated, valid reasons are provided in line with the Complaints Policy and HOS Complaints Handling Code.
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		Secured records are kept for each individual complaint, comprising the relevant complaint correspondence. A folder is set up for each complaint and staff are required to ensure that all relevant supporting investigation information, including surveys and reports, are saved in this location.
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	City of London Housing Complaints Policy 7.3. (page 5): housing-complaints-policy-v4	Staff are made aware that remedying a complaint should not be delayed and to seek early resolution where it can be achieved.
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	Yes	City of London Housing Complaints Policy 7.7. (page 8): housing-complaints-policy-v4 unreasonable-behaviour-policy	A set criterion must be evidenced prior to any communication sanctions being implemented; this is in accordance with the

	putting any restrictions in place and must keep restrictions under regular review.			Unreasonable Behaviour Policy. Any sanctions must be authorised by the Assistant Director.
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	City of London Housing Complaints Policy 7.7. (page 8): housing-complaints-policy-v4 unreasonable-behaviour-policy	Consideration of individual needs and any vulnerability is given for each case. And where it is deemed appropriate, a single point of contact is put in place. There is a right of appeal.

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	City of London Housing Complaints Policy 7.3. (page 5): housing-complaints-policy-v4	Weekly meetings are held with the Property Services Team where ongoing complaints are discussed and updates regarding actions taken are shared. Where appropriate, the Housing Complaints & Customer Feedback Team will escalate complex complaints to senior management and flag any risks or vulnerabilities identified.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	housing-complaints-leaflet	There is an auto-response set up on the on the email account, notifying complainants that their communication has been received and is under review, and that complaints will be formally acknowledged within 5-working days.

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	housing-complaints-leaflet City of London Housing Complaints Policy 5.1. (page 3): housing-complaints-policy-v4	The set timeframe to respond to Stage One Complaints is 10 working days, and is set out in the Housing Complaints Policy and the Housing Complaints Leaflet.
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	housing-complaints-leaflet City of London Housing Complaints Policy 7.3. (page 6): housing-complaints-policy-v4	The Housing Complaints Team liaise with investigating officers to discuss the complexity of the complaint and the time needed to conclude a thorough investigation. Residents are contacted in advance of the original deadline, to inform them of any additional time needed beyond the set ten days timeframe. If the complaint cannot be responded to without good reason (within the extension period), the matter is referred to the Head of Service.
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		Template forms and all complaints correspondence with residents regarding extensions to timescales, informs residents that they can contact the HOS at any stage of a complain, along

				with the details on how to do so, with links to the HOS.
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		Staff are reminded that complaint responses should not be withheld whilst waiting for actions to be completed. Actions arising from investigations are tracked and monitored by the Housing Complaints & Customer Feedback Team.
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	Investigation Guidance Template (Appendix 4)	The investigation guidance document includes the complaint definition, and all points in the complaints are noted in the guidance to ensure that it is fully investigated and responded to. Clear reasons for all decisions in the complaint outcome are supported by referencing relevant policy, good practice, and Housing Law where appropriate.
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		When additional information is received from a resident about a complaint, which is related to the original complaint, the information is incorporate into the investigation guidance for the investigating officer. If

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			the Complaint is already allocated for investigation, the resident is made aware that response timeframes could be affected. If the additional information is a separate matter, a new complaint is logged and acknowledged at Stage 1.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>Stage One Response Template (Appendix 2)</p> <p>Investigation Guidance Template (Appendix 4)</p>	The information required in the response is detailed in the investigation guidance document and the template response for Stage 1 and 2, which are provided to investigating officers.

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	Yes	housing-complaints-leaflet	Residents are informed on how to escalate their complaint. Escalated

	progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.		City of London Housing Complaints Policy 7.3. (page 6): housing-complaints-policy-v4	complaints are accepted unless there is clear evidence that the complaint doesn't warrant escalation, in accordance with policy and the code. This is detailed in Stage 1 complaint response and also in the Complaints Policy and Website. Residents do not have to provide explicit reasoning as to why they wish to escalate their complaint.
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	housing-complaints-leaflet	Complaints escalated to Stage Two are acknowledged within five working days of receipt within the Housing Division.
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	housing-complaints-leaflet Stage One Response Template (Appendix 2)	The following wording is included at the end of Stage One Complaint response: <i>"This letter concludes Stage One of the formal Housing Complaints procedures. If you are dissatisfied with the way your complaint has been dealt with, you have the right to escalate it to</i>

				<p><i>Stage Two of the Housing Complaints procedures. To do this you will need to contact the Housing Complaints & Customer Feedback Team housing.complaints@cityoflondon.gov.uk. You do not need to detail the reasons why you feel that your complaint has not been satisfactorily dealt with at stage one of the process, but it can be helpful to the investigator at stage two if you do so.”</i></p> <p>Investigators at stage two are expected to make contact with the resident to understand the nature of their complaint if not already explained in their escalation.</p>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	housing-complaints-leaflet	Complaints at Stage One are typically investigated by a team manager, complaints at Stage Two are typically investigated by a Head of Service. They are never investigated by the same individual.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	housing-complaints-leaflet City of London Housing Complaints Policy 5.1. (page 3): housing-complaints-policy-v4	The set timeframe to respond to Stage Two Complaints is 20 working days, and is set out in the Housing Complaints Policy and the Housing Complaints Leaflet.
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	housing-complaints-leaflet City of London Housing Complaints Policy 7.3. (page 6): housing-complaints-policy-v4	The Housing Complaints Team liaise with investigating officers to discuss the complexity of the complaint and the time needed to conclude a thorough investigation. Residents are contacted in advance of the original deadline, to inform them of any additional time needed beyond the set ten days timeframe. If the complaint cannot be responded to without good reason (within the extension period), the matter is referred to the Head of Service.
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		Template forms and all complaints correspondence with residents regarding extensions to timescales, informs residents that they can contact the HOS at any stage of a complain, along

				with the details on how to do so, with links to the HOS.
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		Staff are reminded that complaint responses should not be withheld whilst waiting for actions to be completed. Actions arising from investigations are tracked and monitored by the Housing Complaints & Customer Feedback Team.
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	Investigation Guidance Template (Appendix 4)	The investigation guidance document includes the complaint definition, and all points in the complaints are noted in the guidance to ensure that it is fully investigated and responded to. Clear reasons for all decisions in the complaint outcome are supported by referencing relevant policy, good practice, and Housing Law where appropriate.
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;	Yes	Stage Two Response Template (Appendix 3) Investigation Guidance Template (Appendix 4)	The information required in the response is detailed in the investigation guidance document and the template response for Stage 1 and 2,

	<p>b. the complaint definition;</p> <p>c. the decision on the complaint;</p> <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>			which are provided to investigating officers.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		If the complaint raised covers more than one service area, appropriate leads will be involved in the process. Outcomes from complaint investigations are shared at Team meetings to ensure appropriate actions are taken.

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	City of London Housing Complaints Policy 7.5. (page 7): housing-complaints-policy-v4	All aspects of 7.1 are considered in addressing service failure and to

	<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>Stage One & Two Response Templates (Appendices 2 & 3)</p> <p>compensation-policy</p>	<p>remedy issues where it is needed.</p>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	<p>Yes</p>	<p>compensation-policy</p>	<p>Remedies offered are considered in line with the compensation policy where appropriate. All other remedies are considered on a case-by-case basis considering the impact upon the resident.</p>
7.3	<p>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.</p>	<p>Yes</p>	<p>Stage One & Two Response Templates (Appendices 2 & 3)</p>	<p>Remedies offered are detailed in the response issued. Remedies and outcomes of complaints are tracked in weekly complaint meetings.</p>

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Staff carrying out complaint investigations are signposted to HOS guidance.
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Section 8: Putting things right

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 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; 	Yes	Housing complaints and customer feedback - City of London	The Annual Complaints Performance and Service Improvement is published on the Housing Complaints and Customer Feedback Webpage

	<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>			
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	Housing complaints and customer feedback - City of London	The Annual Complaints Performance and Service Improvement is published on the Housing Complaints and Customer Feedback Webpage and will contain a statement for Members Responsible for Complaints.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	housing-complaints-policy-v4	The Housing Complaints Policy was updated in 2024 following the Complaints Handling Code being made statutory in April 2024.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		The Landlord will review and update the self-assessment if required by the Housing Ombudsman.
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	Yes		The Landlord will inform the Housing Ombudsman in an instance where they are unable to comply with the code, and will publish an update to residents on the website with timescales as

	must provide a timescale for returning to compliance with the Code.			to when they are able to return to compliance with the code.
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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		There is a bi-monthly Complaints Learning Panel and a twice-yearly meeting with Heads of Service to identify and track trends and lessons learned.
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		The Team from the Housing Complaints & Customer Feedback Team regularly attend Housing Team meetings to promote a positive complaint handling culture. Feedback is used in the Complaints Learning Panel and to implement positive changes in service delivery.
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	Agenda for Housing Management and Almshouses Sub (Community and Children's Services) Committee on Thursday, 15th May, 2025, 11.00 am - Modern Council	A twice yearly Complaints Report will be provided to the Housing Management & Almshouses Sub Committee. This information is accessible to staff, residents and Members. Complaints reports are regularly presented to the

				Housing Management Team.
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 Assistant Director of Housing has been appointed as the Senior Lead Person responsible for Complaints.
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		There are two Members Responsible for Complaints from the Housing Management & Almshouses Sub Committee.
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	Agenda for Housing Management and Almshouses Sub (Community and Children's Services) Committee on Thursday, 15th May, 2025, 11.00 am - Modern Council	The Members Responsible for Complaints receive a weekly update on active complaints, and a monthly report containing more detailed complaint data. A twice yearly Complaints Report will be provided to the Housing Management & Almshouses Sub Committee
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	Agenda for Housing Management and Almshouses Sub (Community and Children's Services) Committee on	The Members Responsible for Complaints receive a weekly update via email on the number of complaints

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>Thursday, 15th May, 2025, 11.00 am - Modern Council</p>	<p>alongside a monthly summary of outcomes. They are also provided with data on complaints handling performance in these monthly summaries. They are also provided with information on Ombudsman findings and 6 monthly reports to the Housing Management and Almshouses Sub Committee.</p>
<p>9.8</p>	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	<p>Yes</p>		<p>The key objectives of fairness, putting things right and learning from outcomes are promoted at weekly compliant meetings and Senior Management meetings</p>

Appendix 1: Third Party Authorisation Form

Department of Community and Children's Services

Judith Finlay

Executive Director of Community and Children's Services



Third Party Authorisation

Giving a named individual permission to receive information about the authorising party.

Your name and contact information (Resident)

Name	
Address	
Email	
Tel no.	

Name of the person you're giving permission to request and receive Information about you (Third Party)

Name	
Company/Organisation	
Position	
Email	
Tel. no	

I give permission for the above named third party to request and receive information regarding. I understand this could include personal and sensitive information about me.

Signature:

Date:

If at any time you no longer wish to share your information with the third party, please contact your Estate Team. Please refer to the Information Commissioners Officer details on your information rights. www.ico.org.uk

Appendix 2: Stage One Complaint Response Template

Department of Community and Children's Services

Judith Finlay

Executive Director of Community and Children's Services



[NAME]

[ADDRESS]

Email housing.complaints@cityoflondon.gov.uk

Date [DATE]

Dear [NAME]

Stage One Complaint Response – [USE COMPLAINT SUBJECT HEADER]

Thank you for your [email/call/letter] of [date], informing us of your complaint. I am sorry for any **inconvenience/distress** that you have been caused.

[Add summary of the complaint] Your complaint was as follows..... (can be in bullets or written paragraphs)

I have investigated your complaint at stage one of the Housing Complaints procedure. In carrying out my investigation, I have **[interviewed/spoken to, reviewed, considered, requested statements etc..... delete as appropriate]**. I have also taken account of your further communications dated [....] relating to the same complaint. **[Delete as appropriate]**.

ACTIONS

What lessons have been learned in this particular case?

What Actions have been taken to put this right?

What Actions are ongoing or outstanding?

When do you anticipate completion? Use dates/timeframes. Provide dates on when you will give further updates as agreed with the resident. [this information can be presented in tables/bullet points.]

INVESTIGATION OUTCOME

[Include the points that the complainant has raised, and the investigation outcome of each point].

Appendix 2: Stage One Complaint Response Template

To conclude, I [**uphold/do not uphold/partially uphold**] your complaint [**GIVE A BRIEF SUMMARY OF REASONS / FURTHER ACTION THAT IS BEING TAKEN**]

This letter concludes Stage One of the formal Housing Complaints procedures. If you are dissatisfied with the way your complaint has been dealt with, you have the right to escalate it to Stage Two of the Housing Complaints procedures. To do this you will need to contact the Housing Complaints & Customer Feedback Team housing.complaints@cityoflondon.gov.uk. You do not need to detail the reasons why you feel that your complaint has not been satisfactorily dealt with at stage one of the process, but it can be helpful to the investigator at stage two if you do so.

Residents can contact the [Housing Ombudsman Service](#) at any stage of a complaint. You can do so by visiting the Housing Ombudsman Service website by clicking the link above. Alternatively, you can contact them by email: info@housing-ombudsman.org.uk, by phone: 0300 111 3000, or you can write to them at the following address:

Housing Ombudsman Service

PO Box 1484

Unit D

Preston

PR2 0ET

Yours sincerely,

Complaint investigator Sign-off

Making a Complaint

[Housing complaints and customer feedback - City of London](#)
Housing.complaints@cityoflondon.gov.uk

Appendix 4: Investigation Guidance Template

Department of Community and Children's Services
Judith Finlay
Executive Director of Community and Children's Services



[NAME]
[ADDRESS]

Email housing.complaints
@cityoflondon.gov.uk

Date [DATE]

Dear [NAME]

Stage Two Complaint Response – [USE COMPLAINT SUBJECT HEADER]

Thank you for your [email/call/letter] of [date], informing us of your request to escalate your complaint to stage two of the Housing Complaints process. [I have considered the further information that you have submitted.....DELETE AS APPROPRIATE]

I have investigated your complaint at stage two of the Housing Complaints procedure, which involves a review of the outcome of the Stage one investigation.

COMPLAINT AND INVESTIGATION FINDINGS:

In carrying out my investigation, I have [considered, requested statements etc..... delete as appropriate]. I have also taken account of your further communications dated [....] relating to the same complaint. [Delete as appropriate].

To conclude, I [uphold/do not uphold/partially uphold] your complaint [GIVE A BRIEF SUMMARY OF REASONS / FURTHER ACTION THAT IS BEING TAKEN]

ACTIONS:

What lessons have been learned in this particular case?

What Actions have been taken to put this right?

What Actions are ongoing or outstanding?

When do you anticipate completion? Use dates/timeframes. Provide dates on when you will give further updates as agreed with the resident. [this information can be presented in tables/bullet points.]

INVESTIGATION OUTCOME

[Include the points that the complainant has raised, and the investigation outcome of each point].

Appendix 4: Investigation Guidance Template

This letter concludes stage two of the formal Housing Complaints procedures. If you are dissatisfied with the way your complaint has been dealt with, you can contact the Housing Ombudsman Service at the following link. Alternatively, you can contact them by email: info@housing-ombudsman.org.uk, by phone: 0300 111 3000, or you can write to them at the following address:

Housing Ombudsman Service

PO Box 1484

Unit D

Preston

PR2 0ET

Residents can contact the [Housing Ombudsman Service](#) at any stage of a complaint.

Yours sincerely,

Complaint investigator Sign-off

Making a Complaint

[Housing complaints and customer feedback - City of London](#)

Housing.complaints@cityoflondon.gov.uk

Appendix 4: Investigation Guidance Template

Complaint Stage	
Name & Address and contact number/email:	
Date of Complaint	
Date of Acknowledgement	
Deadline	
Investigating Officer	
Resident Reasonable Adjustments / Alerts: Please ensure that any details entered here are taken into consideration in the complaint investigation, response and follow up. Some cases will be flagged as urgent/high priority.	

This table is to be used alongside the original complaint and other relevant communications regarding this matter. If additional information is required from the complainant, please request it ensuring that Housing Complaints is copied in.

If you anticipate that the investigation will go beyond the 10-day turnaround (stage 1) or 20-day turnaround (stage 2), please inform Housing Complaints at the earliest possible convenience so we can make the complainant aware of this in advance.

This guidance has been set in accordance with the Housing Ombudsman Service (HOS) Complaints Handling Code:

The response must include the following:	Quality points to consider in your written response.
<ul style="list-style-type: none"> • Date of Complaint • Stage • Definition and summary of complaint (what the complaint is) • Outcome of investigation and reasons for decision • What have we done to put this right? • What are the outstanding actions (estimate timeframe – agree updates to resident) • Detail escalation process. • Housing Ombudsman details 	<ul style="list-style-type: none"> • Use the active voice and strong verbs. • Empathise and apologise well (be clear on what it is you are apologising for) • Write shorter sentences that deliver more. • Get rid of waffle and jargon, including acronyms and abbreviations and technical terms. • Develop a letter structure that will work for the complainant e.g., you may consider mirroring the style used in the complainant's correspondence, and bullet points to identify the individual points being responded to • Ensure that all points in the complaint are addressed in your response and the response is structured as advised. • Check the names and addresses are correct. • Check spelling and punctuation.

Appendix 4: Investigation Guidance Template

	<ul style="list-style-type: none"> We encourage all Investigators to arrange a meeting or call with the complainant to ensure good customer service and understanding on all aspects of the complaint.
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The expectation is for investigators at Stages 1 and 2 to call/contact the resident to discuss the matter during the investigation. The Housing Complaints Team will make a note in the investigation guidance if they have already had a telephone call with the resident or if the resident has particular communication preferences.

Resident Phone number:

Complaint Definition (what the complaint is about)	Investigation Notes for Response

Outcome sought	Actions Taken / Ongoing Actions / Compensation Awarded

