# ANNUAL HOUSING COMPLAINT PERFORMANCE & SERVICE IMPROVEMENT REPORT 2024-2025





# Annual Housing Complaint Performance & Service Improvement Report 2024-25

Author and Version information

Name Wendy Bolton

Approved by Housing & Communities Overview & Scrutiny Panel

Version no 1

Date June 2025

### **Contents**

| 1.0    | Introduction2   |
|--------|---|
| 2.0    | Complaint handling governance and procedures3   |
| 2.1    | Governance  |
| 2.2    | Policy and procedures4  |
| 2.3    | Complaints Handling Team4   |
| 3.0    | Complaint handling performance6   |
| Sta    | ge 1 Complaints7  |
| Sta    | ge 2 Complaints9  |
| 4.0    | Complaints referred to the Housing Ombudsman10  |
| 5.0    | Learning and improvement11  |
| 5.1    | Improvements carried out during the period12  |
|        | 2025/26 Improvement Action Plan15   |
| 6.0    | Conclusion  |
|        |   |
| Appen  | dix A: Self-assessment form Error! Bookmark not defined.                                      |
| Sectio | n 1: Definition of a complaint Error! Bookmark not defined.                                   |
| Sectio | n 2: Exclusions Error! Bookmark not defined.  |
| Sectio | n 3: Accessibility and Awareness Error! Bookmark not defined.                                 |
| Sectio | n 4: Complaint Handling Staff Error! Bookmark not defined.                                    |
| Sectio | n 5: The Complaint Handling Process Error! Bookmark not defined.                              |
| Sectio | n 6: Complaints Stages Error! Bookmark not defined.   |
| Sectio | n 7: Putting things right Error! Bookmark not defined.  |
| Sectio | n 8: Putting things right Error! Bookmark not defined.  |
|        | n 9: Scrutiny & oversight: continuous learning and improvement <b>Error! Bookmark</b> efined. |

### 1.0 Introduction

This report provides an analysis of complaints received by Nuneaton and Bedworth Borough Council from housing tenants and leaseholders during the period 01 April 2024 to 31 March 2025.

We have included in this report:



Details of the council's housing complaint handling performance and compliance.



Areas of good practice.



A summary of complaints including numbers, themes and trends, response times and outcomes.

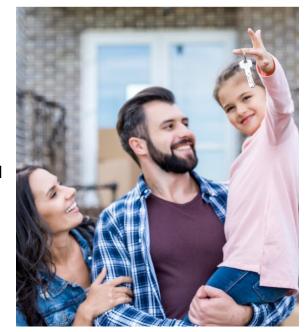


Service improvements identified as a result of complaints.

Nuneaton and Bedworth Borough Council deliver housing services to tenants and their families living in **5625** homes across the borough. By identifying and making improvements to our services, our aim is to achieve best practice in our complaint handling process and ultimately provide a better service to our tenants and leaseholders.

We are committed to meeting our obligations to be compliant with the Housing Ombudsman Complaint Handling Code 2024.

A self-assessment of compliance with the Housing Ombudsman Complaints Handling Code has been undertaken and is attached at Appendix A.



### 2.0 Complaint handling governance and procedures

### 2.1 Governance

The Member Responsible for Complaints (MRC) is the Leader of the Council and Portfolio Holder for Housing and Communities. During this reporting period monthly meetings were held with the MRC, the Strategic Director, and Assistant Director for Housing, and also with the Business Performance Officer to:

- review the previous month's complaint data;
- discuss any emerging issues or trends;
- to consider complaint outcomes; and
- to review any actions against agreed service improvements.



Cllr Christopher Watkins

A dedicated Housing and Communities Overview & Scrutiny Panel was established in May 2024, following local elections, to provide a more dedicated focus on Housing and Communities matters. This has resulted in a more detailed scrutiny of the Council's housing services, including complaint handling and outcomes. Quarterly complaint handling performance reports are submitted to the Housing and Communities Overview & Scrutiny Panel providing details of key housing performance indicators, including:

- Number of complaints received.
- Percentage of complaints completed outside of the service level agreement.
- % of complaints responded to in full at Stage 1.
- % of complaints responded to in full at Stage 2.
- Number of complaints upheld.
- Housing Ombudsman cases.

Corporate complaint handling performance reports are presented quarterly to the Council's Senior Management Team consisting of the Chief Executive and four Strategic Directors. Detailed monthly complaint analysis reports are also reported to the Strategic Director for Housing & Communities and Assistant Directors for Housing, where complaint themes and trends are

reviewed and any changes or improvements to service identified and actions monitored. The report also includes any key findings from the most recent Housing Ombudsman Spotlight report.

### 2.2 Policy and procedures

The Council's <u>Housing Complaints Policy and Procedures</u> provide the framework for ensuring that formal complaints are handled consistently, fairly, effectively, confidentially and in a timely manner by competent complaint handling staff.

The Council encourages any tenant or service user who has a concern to first approach the team or member of staff in the relevant service area or make a service request:

| CUSTOMER  | HEART   | STRATEGIC   | LANDLORD   | PROPERTY   |
|---|---|---|--|--|
| SERVICES  |   | HOUSING   | SERVICES   | SERVICES   |
| The corporate point of contact for all customer enquiries, feedback, notifications, comments, compliments and complaints. | Providing advice and assistance to deliver disabled adaptations and home improvements to keep tenants safe, secure and warm in their homes. | Providing<br>services such as<br>homeless-ness,<br>private sector<br>housing and<br>Housing<br>Allocations. | Providing services such as tenancy management, estate management, anti-social behaviour, tenant support, tenant engagement and independent living. | Providing day to day repairs to the council's housing stock, including planned works, such as door and window replacements, kitchen and bathroom upgrades, roofing works, whilst ensuring homes are safe to live in. |

If after requesting a service or raising their concerns about an existing service request, the tenant is dissatisfied with the proposed resolution, tenants are then encouraged to make a formal complaint to the Council.

### 2.3 Complaints Handling Team

The Council's chosen system for recording comments, complaints and compliments is the Granicus System. The corporate responsibility for administering the system is carried out by the Council's Information Technology & Communications Team. Corporate responsibility for system

training and also monitoring the use of the system is held by the Customer Experience & Data Protection Officer. Complaint e-learning also forms part of the Customer Services staff mandatory induction training along with frontline staff communication training, covering how to communicate professionally with our customers, including those making complaints.

The Council's Complaint Handling Team consists of a combination of officers, with Customer & Client Services and Housing Services teams carrying out specific aspects of the 'Complaint Officer' role. The diagram below depicts the roles and responsibilities of individual members of the team.

# The Customer Experience & Data Protection Officer

Responsible for corporate Complaint Handling, performance reporting and overseeing the corporate use of the Granicus system. This role is also the Council's lead contact for the Housing Ombudsman & Local Government & Social Care Ombudsman.

# Customer Services Advisors

Responsible for logging complaints on the Granicus system and assigning complaints to the relevant service teams.

# Assistant Director of Social Housing & Community Safety

Responsible for assessing any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision and reporting to the governing body.

### **Housing Team Leaders & Managers**

Responsible for investigating and responding to complaints at Stage 1 and Stage 2.

### **Housing Assistants**

Responsible for assigning housing complaints to lead investigating officers, and monitoring progress of complaints through to response in line with complaint handling timeframes.

# Housing & Community Safety Business Performance officer

Responsible for analysing and reporting Housing complaint handling performance, trends and themes to Housing management.

### 3.0 Complaint handling performance

From 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025 the Council received **290** formal complaints from tenants – see Table 1 below.

|         | Total no. of complaints received | No. per 1,000<br>housing stock |      | Responded to within the Housing Ombudsman Complaint Handling timescales |          |
|---------|----------------------------------|--------------------------------|------|---|----------|
|         |                                  | Mid Year<br>year end           |      | Mid year  | Year End |
| Stage 1 | 290                              | 21.5                           | 51.5 | 96.5%   | 93.5%    |
| Stage 2 | 36                               | 2.66                           | 6.04 | 94.5%   | 64%      |

Table 1: Housing Complaints 2024/25

Table 1 above indicates there was an increase of 23 (9%) in the numbers of formal Stage 1 complaints received from tenants compared to the previous year (267 in 2023/24 – see Table 2 overleaf).

The response time was extended on **21** Stage 1 complaints. This was due to more information being sought from the complainant or the case being deemed to be complex due to the requirement of information from other service areas, such as legal services, grounds maintenance etc.

**19** Stage 1 complaints (6.5%) were not responded to within the complaint handling timeframes (including extended cases).

The Council refused to accept one complaint during the 2024/25, as it was from a third party that did not have the required permissions to handle the complaint on behalf of the complainant.

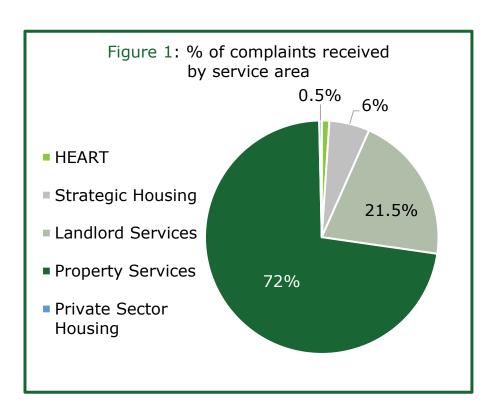
The figures in Table 1 when compared with the previous year shown in Table 2 opposite, indicate an increase of 3.5% in the number of Stage 1 complaints handled outside the complaint handling timescales.

|            | Total no. of complaints received 2023/2024 | Responded to<br>within the<br>Housing<br>Ombudsman<br>Complaint<br>Handling<br>timescales |     |
|------------|--|---|-----|
|            |  | No.   | %   |
| Stage<br>1 | 267  | 259   | 97% |
| Stage<br>2 | 35   | 3   | 91% |

Table 2: Housing Complaints 2023/24

### **Stage 1 Complaints**

Figure 1 shows the breakdown of complaints received by service area. By far the largest proportion of formal complaints (72%) were received by Property Services, which includes responsive repairs and capital works. This is a slight reduction compared to 2023/24 performance of 76%.



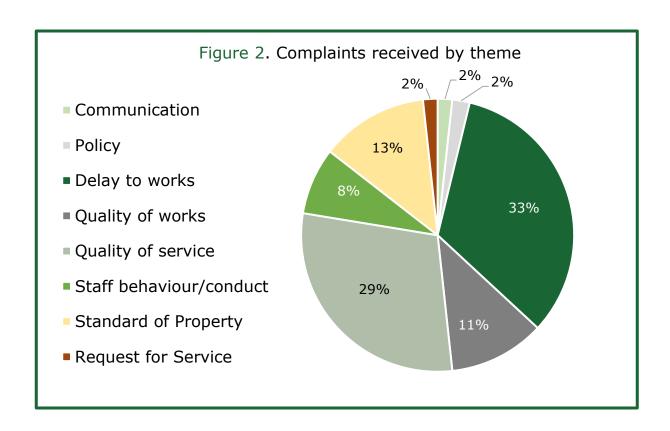


Figure 2 above shows a breakdown of complaints received by theme. Property Services has been identified as the main service area requiring consideration and improvement. Delay to works, the quality of works, scheduling and the keeping of appointments, and the general lack of communication regarding the status of works are the main reasons for dissatisfaction.

In October 2024 Nuneaton and Bedworth Borough Council appointed consultants Campbell Tickell, to carry out a review of responsive repairs, alongside a full review of performance against the Housing Regulator's consumer standards. An improvement plan has been created to monitor actions against Campbell Tickell's recommendations. More details of the review can be found in <u>Section 5</u> of this report.

**50%** (145) of all formal Stage 1 complaints investigated were upheld. This is an increase of **18%** on the previous year. It was recognised that there had previously been a degree of inconsistency when determining complaint outcomes and remedies, however further training and the approval and implementation of the <u>Housing Complaints Remedy and Compensation Policy</u>, resulted in a marked improvement in this area.

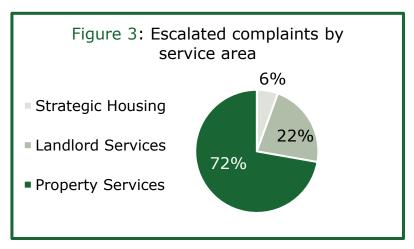
### **Stage 2 Complaints**

During the period 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025, **36** (12%) of all Stage 1 complaints were escalated to Stage 2. Of those Stage 2 complaints, **18** (50%) were upheld.

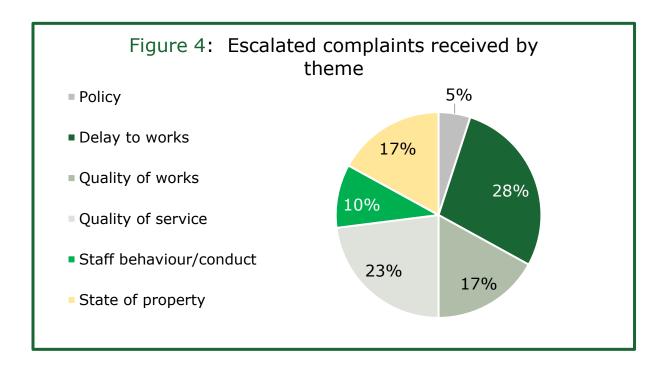
Of the 36 Stage 2 complaints, one case was extended and responded to within the timescales, however **12** (33%) complaints were responded to outside of the complaint handling timescales.

Figure 3 shows the breakdown of Stage 2 complaints by service area. The largest number of escalated complaints were received by Property Services.

Figure 4 below shows the theme of complaints escalated to Stage 2. Again, here we see that the delay to works and the quality of works,

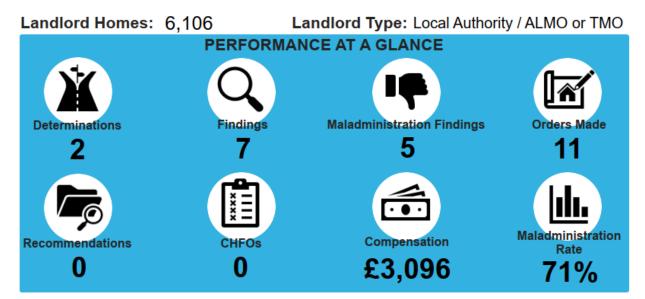


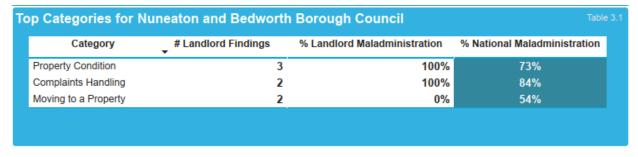
causes the greatest dissatisfaction for tenants.



### 4.0 Complaints referred to the Housing Ombudsman

The <u>Housing Ombudsman's individual Landlord Performance Report</u> for Nuneaton and Bedworth Borough Council for the period 2023/2024 reported the following:







All 11 orders were complied with within three months.

During 2024/25 two cases were investigated and concluded by the Housing Ombudsman.

The Ombudsman found fault with both cases and a total of £300 was ordered to be paid by the Council in compensation.



### 5.1 Improvements carried out during the period

An action plan was reported in the previous 2023/24 report and the following service improvements were carried out during this reporting period:

 Engagement – a Tenant and Leaseholder Engagement Strategy was approved and adopted following consultation with tenants and review by TPAS. This strategy and associated delivery plan will ensure



that the Council improves its information sharing with tenants and that we are able to co-design services to improve satisfaction and reduce inconvenience to tenants and leaseholders.

- Engagement The Supporting Tenants around Neighbourhoods vehicle (STAN the Van) has been utilised to engage with tenants within their community, to express concerns and for the Council to consult matters such as the Capital Investment Programme.
- Engagement Focus Groups a Focus Group was held to review the
  information provided to tenants in relation to damp and mould. As a
  result of feedback, the information was redesigned to reflect tenants'
  requirements. A further Focus Group was held to co-design the 'Housing'
  pages of the Council's website. An on-line consultation exercise has also
  been undertaken, and we are now working to implement the
  requirements identified as part of this consultation. It is anticipated that
  this will improve the tenant experience and ensure that information is
  easier to find.
- Policy a <u>Housing Complaint Remedy and Compensation Policy</u> was approved and implemented in November 2024. Training was given to all relevant members of staff, and this has increased consistency of complaint responses, resulting in a higher number of complaints upheld.
- A review of complaints made by Members of Parliament and Elected Members was carried out. Only two formal complaints were submitted during 2024/25. However, members can request a service, request an update or ask for more information, via a dedicated online portal. A corporate review of the member enquiry process is currently ongoing.

- A review of our performance against the Tenant Participation Advisory Service (TPAS) Accreditation was undertaken by TPAS. Following receipt of their report and recommendations, an action plan is being formulated to achieve accreditation by the end of March 2026.
- Anti-Social Behaviour Resolve Standard Accreditation the <u>Resolve Standard</u> is a new national standard that allows organisations to continue to adapt their approach so that every tenant feels safe and happy in their home and part of a strong community. The award followed feedback from an audit of our processes and interviews regarding the Council's ASB service which involved Council residents and partners such as Warwickshire Police, prompted by the low satisfaction of our tenants in relation to handling ASB complaints.
- Review of the complaint handling ITC system there have been several changes to the Granicus functionality to improve reporting, however the system is used across the organisation for all departments and therefore there is limits to the functionality changes that can be introduced.
- Training Extensive training has been undertaken by members of the housing team during 2024/25. Examples of training undertaken includes:

| Training Course  | Training<br>Provider                         | Description  |
|--|--|--|
| Achieving Customer<br>Service Excellence in<br>your organisation | Gunn Stewart<br>Solutions                    | In this webinar, Esther Stewart of Gunn Stewart Solutions, formerly a multi- award winning Head of Service in Local Government, shares her extensive knowledge of how to transform customer service and customer experiences, and deliver improved customer outcomes and efficiencies. |
| Housing Ombudsman<br>Dispute Resolution<br>Training              | Housing<br>Ombudsman                         | To develop knowledge & understanding to help resolve disputes at an early stage and at a local level, based upon dispute resolution principles.  |
| Domestic Abuse<br>Training                                       | Warwickshire<br>County Council &<br>Partners | Recognising and responding to sexual violence.   |

|   |                            | Understanding Domestic<br>Abuse and Coercive &<br>Controlling behaviour.  |
|---|----------------------------|---|
| Scrutiny Panels   | Housing Quality<br>Network | Making tenant scrutiny work   |
| Hoarding and Mental<br>Health   | Housing Quality<br>Network | To gain a better understanding of those who hoard and supporting their mental health whilst balancing the safety and maintaining a reasonable property condition. |
| Block Inspections   | Housing Quality<br>Network | How to undertake appropriate block inspections and employ effective monitoring.   |
| ASB - Effective<br>Management and Case<br>Resolution Using The<br>Noise App | Housing Quality<br>Network | Understanding statutory nuisance & early intervention strategies.   |

Alongside the improvements above, individual service teams delivered service improvements/changes as a result of complaints. Below are some examples of changes and improvements implemented:

- ASB Pledge Award The <u>ASB Pledge</u> seeks to encourage all agencies involved in the ASB Case Review process to embed best practice into their policy and procedures. The Council has strengthened its case review process, providing more opportunities for individuals and communities to be heard and supported.
- Policy Review following a complaint, a review was carried out of the Scooter Policy to ensure it was consistent and fair regarding compliance for both mobility scooters and e-bikes.
- Procedure Change following a complaint about communal fly-tipping and a delay in removing items which were a hazard to visually impaired tenants, the disposal procedure was changed to ensure that any items that could not be disposed of due to collection weight restrictions, be stored safely and a card left detailing the date of the collection.
- Grounds maintenance contract review following complaints regarding the grounds maintenance of Housing Revenue Account land, a review of the contract service level agreement took place with a view to developing a programme of works from 1<sup>st</sup> April 2025.

- Procedure Change large numbers of complaints have been received in relation to poor communication regarding responsive repairs. All Council Operatives have now been issued with new mobile phones and are required to telephone ahead of attendance to assist the tenant to either facilitate the repair or re-book as required.
- Following the receipt of a number of complaints relating to missed appointments by the gas servicing & repair contractor, a full external audit was undertaken to review working practices and identify improvement actions. Reporting and monitoring mechanisms have now been altered to ensure all arranged appointments are honoured and any issues are communicated to the tenant in a timely manner.

### 5.2 2025/26 Improvement Action Plan

| Ref | Improvement Action  | Officer<br>Responsible   | Deadline         |
|-----|---|--|------------------|
| 1.  | Investigate a process and change to the Granicus system to record the delivery of complaint outcomes actions. Establish a working Group to identify appropriate monitoring process for each activity type. Develop and adopt a Policy approach. | Assistant Director for<br>Social Housing and<br>Community Safety | March 2026       |
| 2.  | Investigate a process and change to the Granicus system to facilitate complaint monitoring by protected characteristics, to assess fairness and inclusion.  | Assistant Director for<br>Social Housing and<br>Community Safety | March 2026       |
| 3.  | Undertake a restructure of service provision to provide more resource for the independent investigation and response to complaints at both Stage 1 and 2.   | Assistant Director for<br>Social Housing and<br>Community Safety | August<br>2025   |
| 4.  | Develop and deliver an action plan to achieve TPAS accreditation to improve the tenant experience.  | Service Manager –<br>Tenancy Services                            | March 2026       |
| 5.  | Improve information contained within the Service Annual Report to better identify the changes and improvements made to services following tenant and leaseholder feedback.  | Service Manager –<br>Tenancy Services                            | December<br>2025 |
| 6.  | Deliver the Service Improvement Plan actions derived from the CT review to improve services to tenants and the tenant experience.   | All Service Managers   | March 2026       |

| 7.  | Improve the recording of service improvements made as a result of complaints.   | Assistant Director for<br>Social Housing and<br>Community Safety | March 2026 |
|-----|---|--|------------|
| 8.  | Review the approach to tracking and monitoring the service improvement actions identified from complaints   | Assistant Director for<br>Social Housing and<br>Community Safety | March 2026 |
| 9.  | Undertake a review of the Void Property Re-<br>Let Standard with the aim of improving the<br>condition of homes and reducing the number<br>of repairs and dissatisfaction reported, both<br>upon viewing and shortly after tenancy<br>commencement. | Service Managers –<br>Tenancy Services &<br>Capital Investment   | March 2026 |
| 10. | Continue to build a positive complaints culture and learning from complaints by establishing an Action Learning mechanism.  | Assistant Director for<br>Social Housing and<br>Community Safety | March 2026 |

### 6.0 Conclusion

Our Annual Housing Complaint Performance and Service Improvement Report for 2024/25 demonstrates a number of positive actions undertaken to improve the Council's approach to complaint handling. However, it is clear that we must continue to focus upon our journey of improvement, both in terms of performance and to tackle the causes of complaints.

There will continue to be an emphasis on learning from complaints and the mechanisms that will allow us to demonstrate real change based upon what our tenants and leaseholders are telling us. Our customers remain at the heart of our service delivery and their inclusion in the design of those services must be genuine and meaningful.

This document has been published by Nuneaton and Bedworth
Borough Council
Housing.admin@nuneatonandbedworth.gov.uk

### **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:<br>Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|---------------------|--|--|
| 1.2            | A complaint must be defined as:  'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'   | Yes                 | Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council  Housing Complaints Policy - March 2024 | The Council recognises the difference between a complaint and service request.  These definitions are set out in Section 4.1 of the Housing Complaints which is available on the Council's website and was last updated in March 2024.  They are also published on the Council's Housing Complaint web page. |
| 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                 | Housing Complaints Policy -  March 2024  | This information is set out in Section 4.7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |

|     |  | 1   | T  | T   |
|-----|--|-----|--|---|
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council  Housing Complaints Policy - March 2024   | The Council recognises the difference between a complaint and service request.  These definitions are set out in Section 4.1 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  They are also published on the Council's Housing Complaint web page.                             |
| 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 Policy - March 2024  Supplementary evidence can be extracted from our Housing Management System upon request. | This information is set out in Section 4.4 of the Housing Complaints Policy which is available on the Councils website and this was last updated in March 2024.  Our Housing Management system will evidence that a service continues to be delivered when a customer has logged a complaint. Evidence of this can be demonstrated if required. |

| 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 | Housing Complaints Policy - March 2024  Supplementary evidence of various communications can be provided upon request. | This information is set out in Section 5.0 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  All written communications issued by the Council include details of how to make an expression of dissatisfaction and how to complaint. Information about the Housing Ombudsman is also included on all written communications.  Examples of the information to comply with section 1.6 of the Housing Ombudsman Code are available upon request. |
|-----|--|-----|--|---|
|-----|--|-----|--|---|

# **Section 2: Exclusions**

| Code provision | Code requirement  | Comply:<br>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                 | Housing Complaints Policy -<br>March 2024               | This information is set out in Sections 4.5 and 4.6 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  As reported in the Annual Housing Complaint Performance & Improvement Report, one complaint was not accepted in 2024/2025, and this was because it was from a third party that did not have the required permissions to handle the complaint on behalf of the initial complainant. |
| 2.2            | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and   | Yes                 | <u>Housing Complaints Policy -</u><br><u>March 2024</u> | This information is set out in Sections 4.5 of the Housing Complaints Policy which is available on the Council's   |

|     | <ul> <li>reasonable to residents. Acceptable exclusions include:</li> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having</li> </ul>                         |     |   | website and was last<br>updated in March 2024.   |
|-----|--|-----|---|--|
|     | <ul> <li>been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>  |     |   |  |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Housing Complaints Policy -<br>March 2024 | This information is set out in Section 4.5 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Lead Investigators have discretion to consider complaints received as to whether to accept complaints raised outside of the requirements under section 2.3 of the Housing Ombudsman Code. |
| 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  | Yes |   | This information is set out in Section 4.5 of the Housing Complaints Policy which is available on the Council's  |

|     | 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. |     | Housing Complaints Policy - March 2024  | website and was last updated in March 2024.  As reported in the Annual Housing Complaint Performance & Improvement Report, one complaint was not accepted in 2024/2025, and this was because it was from a third party that did not have the required permissions to handle the complaint on behalf of the initial complainant.                     |
|-----|--|-----|---|---|
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.               | Yes | Housing Complaints Policy -  March 2024  Supplementary evidence of various complaints and responses can be provided upon request. | This information is set out in Section 4.5 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Examples of the complaints received and the Council's responses to the complaints can be provided to evidence compliance with section 2.5 of the Housing Ombudsman Code, upon request. |

# **Section 3: Accessibility and Awareness**

| Code provision | Code requirement  | Comply:<br>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                 | Housing Complaints Policy - March 2024  Vulnerable Persons Policy 2024- 2027  Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council | This information is set out in Section 5 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Details of how to make a formal complaint to the council are published on the Council's website and included as standard in all written communications, e.g. letters, newsletters, email footers, surveys, consultations.  The Council has a Vulnerable Persons Policy for identifying vulnerable persons and ensures that communication needs are met and/or reasonable adjustments are made.  All Council policies have Equality and Impact |

|     |   |     |  | assessments carried out, along with including a statement of our compliance with the Equality Act 2010. All Council policies are available on our website.   |
|-----|---|-----|--|--|
| 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 | Housing Complaints Policy - March 2024 | All staff have individual training records that can be shared upon request.  All Housing staff have access to the Housing Ombudsman e-learning facilities.  Complaint training is part of the mandatory induction training for our Customer Services team.  All "frontline" staff have mandatory training on "Making Every Contact Count" and Frontline Communications training and this is saved on individual training records.  All Council staff who have contact with residents are aware of what a request for |

|     |  |     |  | service is and a complaint about our service. They are also aware of the complaints process and understand they must raise the concerns shared with the appropriate team within the Council to raise a complaint.  We are reviewing our training provision for all staff on complaints handling and this will be done by March 2026. |
|-----|--|-----|--|--|
| 3.3 | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain. | Yes | Housing Complaints Policy - March 2024  Make Things Right Campaign | We welcome feedback from our customers, including complaints, compliments Tenant Satisfaction Measures (TSM) Surveys and other perception surveys, e.g. for Anti-Social Behaviour (ASB).  The Council supports and promotes the Governments 'Make Things Right' campaign.  |
| 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,   | Yes | Housing Complaints Policy - <u>March 2024</u>                      | This information is set out in Section 6 of the Housing Complaints Policy which is   |

|     | what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.  |     | Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council  | available on the Council's website and was last updated in March 2024.   |
|-----|--|-----|---|--|
| 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 | <u>Housing Complaints Policy -</u><br><u>March 2024</u>   | This information is set out in Sections 1.2 and 7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 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 | Housing Complaints Policy -<br>March 2024   | This information is set out in Section 4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |
| 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 | Housing Complaints Policy - March 2024  Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council  Supplementary evidence of communication templates can be provided upon request. | This information is set out in Section 7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  All written communications issued by the Council, e.g. emails, letters, surveys, rent statements, consultations |

|  | etc. include information about the Housing Ombudsman and how to contact the Ombudsman with a complaint.          |
|--|--|
|  | Examples of the information to comply with section 3.7 of the Housing Ombudsman Code are available upon request. |

# **Section 4: Complaint Handling Staff**

| Code provision | Code requirement   | Comply:<br>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                 | Housing Complaints Policy - March 2024  Supplementary evidence of job descriptions can be provided upon request. | The 'Complaints Officer' role is fulfilled by a team of officers: stage one complaints are managed by Senior Officers and Team Leaders; Stage two complaints are managed by Service Managers.  The Assistant Directors of Housing and Community Safety are responsible for ensuring complaints are |

|     |  |     |   | reported to MRC, Housing & Communities Overview & Scrutiny Panel, Leadership Board & Senior Management Team.  The Housing Service Managers are the corporate lead contact with the Housing Ombudsman. The Corporate Support and Data Compliance Manager is the corporate lead contact for the Local Government & Social Care Ombudsman. |
|-----|--|-----|---|---|
| 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. |     | Compensation and Remedy<br>Policy         | The 'Complaints Officer' role is fulfilled by a team of officers: stage one complaints are managed by Senior Officers and Team Leaders; stage two complaints are managed by Service Managers.  Those acting as the Complaints Officer have the authority and autonomy to award compensation.  |
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from   | Yes | Housing Complaints Policy -<br>March 2024 |   |

| complaints. All relevant staff must be suitably |                        | This information is set out in |
|---|------------------------|--------------------------------|
| trained in the importance of complaint          | *Housing Training Log  | Sections 2, 3 and 8 of the     |
| handling. It is important that complaints are   |                        | Housing Complaints Policy      |
| seen as a core service and must be resourced to | *Housing Learning from | which is available on the      |
| handle complaints effectively                   | Complaints Tracker     | Council's website and was      |
|   | Complainte Tracker     | last updated in March 2024.    |
|   |                        | last apaated in Maron 2021.    |
|   |                        | All Service Managers and       |
|   |                        | Team Leaders/Senior            |
|   |                        | Officers have attended         |
|   |                        | dispute resolution training    |
|   |                        | via the Housing                |
|   |                        | Ombudsman Service.             |
|   |                        | Offibudsifian Service.         |
|   |                        | These persons undertaking      |
|   |                        | the Complaints Officer role    |
|   |                        | received further complaint     |
|   |                        | handling training in October   |
|   |                        | 2024.                          |
|   |                        | 2024.                          |
|   |                        | Where service                  |
|   |                        |                                |
|   |                        | improvements can be made       |
|   |                        | following complaints           |
|   |                        | received, these instances      |
|   |                        | are logged including the       |
|   |                        | improvement required, when     |
|   |                        | it will be implemented by      |
|   |                        | and evidence it has been       |
|   |                        | done on the Council's          |
|   |                        | Learning from Complaints       |
|   |                        | tracker.                       |
|   |                        |                                |

|  | *supplementary<br>evidence/information that<br>can be provided upon<br>request. |
|--|---|
|--|---|

# **Section 5: The Complaint Handling Process**

| Code provision | Code requirement  | Comply:<br>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                 | Housing Complaints Policy - March 2024  Council housing complaints   Customer feedback   Nuneaton and Bedworth Borough Council | The Council's Housing Complaints Policy is available on the Council's website and was last updated in March 2024.  This information is also on the Council's website. |
| 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                 | Housing Complaints Policy -  March 2024  | The Council's Housing<br>Complaints Policy is<br>available on the Council's<br>website and was last<br>updated in March 2024.   |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will  | Yes                 | Housing Complaints Policy - <u>March 2024</u>  | The Council's Housing<br>Complaints Policy is   |

|     | make the complaint process unduly long and delay access to the Ombudsman.   |     |   | available on the Council's website and was last updated in March 2024.   |
|-----|---|-----|---|--|
| 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 | Housing Complaints Policy -<br>March 2024 | This information is set out in Section 4.7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  If a third party has been involved in the investigation of a complaint, this is made clear within the stage one and stage two responses. Residents are not 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 | Housing Complaints Policy -<br>March 2024 | This information is set out in Section 4.7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Those undertaking the Complaints Officer role will ensure third parties manage  |

|     |  |     |  | complaints in line with the Housing Ombudsman 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 | Housing Complaints Policy -<br>March 2024  | This information is set out in Section 4.7 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |
| 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 | Housing Complaints Policy - March 2024  Supplementary evidence of letter templates can be provided upon request. | This information is set out in Section 6.5 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Letter templates are used for all complaint investigations and responses to ensure that those acting as the Complaints Officer clarifies their understanding of the nature of the complaint.  Clarification will be sought from the resident by those acting as the Complaint Officer where required. |

| 5.8 | At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and  d. consider all relevant information and evidence carefully. | Yes | Housing Complaints Policy - March 2024  *NBBC Values  *Housing Learning Log  *NBBC Declaration of Interest | This information is set out in Section 2 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  All Council staff work to seven Values and these are included in mandatory training for all staff.  All staff undertaking the Complaint Officer role received complaint handling training in October 2024. They are empowered to put things right through taking responsibility and ownership.  All investigations and responses have independent oversight and quality assurance.  All colleagues make an annual declaration of any potential conflicts of interest.  *supplementary evidence can be provided |
|-----|---|-----|--|---|
|-----|---|-----|--|---|

| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes | Housing Complaints Policy -  March 2024   | This information is set out in Section 6 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |
|------|--|-----|---|--|
| 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 | Housing Complaints Policy - March 2024  Vulnerable Persons Policy 2024- 2027  Individual Cabinet Member Decision - Reasonable Adjustment Policy | This information is set out in Section 1 and 3 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Council has a Vulnerable Persons Policy for identifying vulnerable persons and ensures that communication needs are met and/or reasonable adjustments are made.  All Council policies have Equality and Impact assessments carried out, along with including a statement of our compliance with the Equality Act 2010. All Council policies are available on our website. |

|      |   |     |   | All staff are aware that any reported vulnerabilities are regularly checked and updated where necessary, along with any adjustments required to meet these needs.  A Reasonable Adjustment policy was approved in June 2025 and is available on the Council's website. |
|------|---|-----|---|--|
| 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 | Housing Complaints Policy -  March 2024   | This information is set out in Section 4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |
| 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 | *Granicus System  *Housing Management System Cases  *Document Management System | All complaints are logged on the Granicus System. All responses to the complaint are recorded on this platform throughout the complaints process.  Any investigations, additional communications, service improvements,  |

|      |   |     |  | actions to be taken following complaints to resolve the issue(s) will be logged on the Housing Management System and/or on the Council's Document Management system.  *supplementary evidence/information can be provided upon request.                                     |
|------|---|-----|--|---|
| 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 | Housing Complaints Policy - March 2024  Compensation and Remedy Policy | This information is set out in Section 8 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  All staff acting as the Complaints Officer have the authority to remedy a complaint at any stage of the process. |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. |     | Tenancy Agreements   Nuneaton and Bedworth Borough Council             | The Council's tenancy agreements highlights that we will deal with any unacceptable behaviour displayed by our tenants or their representatives   |

|      |  |     |  | towards others, including Council staff and contractors.  The Council has a corporate reporting system on Granicus for incidents and near misses involving Council staff and contractors. For persistent, unacceptable behaviour the Council's Equality & Safeguarding Officer the complainant/tenant to explain that they will be monitor all responses going forward and will be provided with a single point of contact for all ongoing correspondence. |
|------|--|-----|--|--|
| 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 | Equality and diversity – Nuneaton and Bedworth Borough Council | For persistent, unacceptable behaviour the Council's Monitoring Officer will write to the customer to explain that they will be monitoring all responses going forward and customers will be provided with a single point of contact for all ongoing correspondence.   |

| support, we will make reasonable adjustments. |
|---|
|---|

# **Section 6: Complaints Stages**

#### Stage 1

| Code provision | Code requirement  | Comply:<br>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                 | Housing Complaints Policy -<br>March 2024               | This information is set out in Section 6 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Housing Management System will be checked before responding to a complaint to determine if a tenant has any recorded vulnerabilities before issuing any communication and a response. |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.  | Yes                 | Housing Complaints Policy - March 2024  Granicus System | This information is set out in Section 6.2 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |

|     |  |     |  | The Granicus systems issues acknowledgements as soon as the complaint is logged and evidence from the system can support this.   |
|-----|--|-----|--|--|
| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.   | Yes | Housing Complaints Policy - March 2024                   | This information is set out in Section 6.4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Granicus system issues the full response and Complaints Officers are responsible for ensuring the 10-working day deadline is met. Evidence from the system, performance reports and the Annual Housing Complaint Performance & Improvement Report 2024/2025 can support this. |
| 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 | Yes | Housing Complaints Policy -  March 2024  Granicus System | This information is set out in Section 6.4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |

|     | reason(s) must be clearly explained to the resident.  |     |  | The Granicus system logs all extension and reasons for extensions, and all extensions including the new deadline for response and the reason for the extension are issued to the resident. Complaint response deadlines are not issued without valid reason. |
|-----|---|-----|--|--|
| 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 | Housing Complaints Policy - March 2024 *Complaint Extension Letter | This information is set out in Section 6.4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  *supplementary information can be provided upon request.  |
| 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 | Housing Complaints Policy -  March 2024                            | This information is set out in Section 6.4 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  This is demonstrated through the response times   |

|     |   |     |   | of Stage 1 and Stage 2 complaints as detailed in the Annual Housing Complaint Performance & Improvement Report 2024/2025.  Outstanding actions are tracked and actioned with updates provided to the resident and this will be evidenced through the Housing Management System.   |
|-----|---|-----|---|---|
| 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 | Housing Complaints Policy - March 2024  *Complaint response letters | This information is set out in Section 6.6 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Letter templates are used for all complaint investigations and responses to ensure that those acting as the Complaints Officer addresses all points raised in the complaint definition and they provide reasons for all decisions, referencing all |

|     |   |     |  | relevant policy, legislation and good practice.  *supplementary information can be provided upon request.  |
|-----|---|-----|--|--|
| 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 | *Granicus System                       | Those managing complaints will check the Granicus system to see if there are any open Stage one complaints; if there is and if new information received is related to the initial stage one complaint this information will be passed onto the Complaints Officer for investigation. If any new issues raised are not related to the initial stage one complaint being investigated, a new complaint will be logged.  *supplementary information can be provided upon request. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage;   | Yes | Housing Complaints Policy - March 2024 | This information is set out in Section 6.6 of the Housing Complaints Policy which is   |

| 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. | *Complaint response letters | available on the Council's website and was last updated in March 2024.  The Council's response letters evidence compliance with section 6.9 of the Housing Ombudsman Code. Templates provide a consistent and compliance way to ensure key information is included. Complaint responses are all bespoke.  *supplementary information can be provided upon request. |
|--|-----------------------------|--|
|--|-----------------------------|--|

#### Stage 2

| Code provision | Code requirement   | Comply:<br>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                 | Housing Complaints Policy -  March 2024  *Complaint response letters | This information is set out in Section 6.9 and 6.14 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024. |

|      |   |     |   | The response letter under stage two states that it is the final response.  *supplementary information can be provided upon request.  |
|------|---|-----|---|--|
| 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 Policy - March 2024  Granicus System | This information is set out in Section 6.10 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Granicus systems issues acknowledgements as soon as the request for stage two is received and evidence from the system can support this. |
| 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 Policy -  March 2024                 | This information is set out in Section 6.9 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  |
| 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 Policy - March 2024    | This information is set out in Section 6.9 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  Evidence of a change of Complaints Officer can be evidenced upon request.   |
|------|--|-----|---|--|
| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged. | Yes | Housing Complaints Policy -<br>March 2024 | This information is set out in Section 6.11 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Granicus system issues the full response and Complaints Officers are responsible for ensuring the 20-working day deadline is met. Evidence from the system, performance reports and the Annual Housing Complaint Performance & Improvement Report 2024/2025 supports this. |
| 6.15 | Landlords must decide whether an extension to this timescale is needed   | Yes | Housing Complaints Policy -  March 2024   |  |

|      | 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. |     | Granicus System   | This information is set out in Section 6.11 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Granicus system logs all extension and reasons for extensions, and all extensions including the new deadline for response and the reason for the extension are issued to the resident. Complaint response deadlines are not issued without valid reason. |
|------|--|-----|---|--|
| 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 | Housing Complaints Policy - March 2024  *Complaint Extension Letter | This information is set out in Section 6.14 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  *supplementary information can be provided upon request.   |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the  | Yes | Housing Complaints Policy -  March 2024                             | This information is set out in Section 6.11 of the Housing   |

|      | 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.         |     | *Housing Management System  | Complaints Policy which is available on the Council's website and was last updated in March 2024.  This is demonstrated through the response times of Stage one and Stage two complaints as detailed in the Annual Housing Complaint Performance & Improvement Report 2024/2025.  Outstanding actions are tracked and actioned with updates provided to the resident and this will be evidenced through the Housing Management System.  *supplementary information can be provided upon request. |
|------|---|-----|---|--|
| 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 | Housing Complaints Policy - March 2024  *Complaint Response Letters | This information is set out in Section 6.12 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.   |

|      |  |     |   | Letter templates are used for all complaint investigations and responses to ensure that those acting as the Complaints Officer addresses all points raised in the complaint definition and they provide reasons for all decisions, referencing all relevant policy, legislation and good practice.  *supplementary information can be provided upon request. |
|------|--|-----|---|--|
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage;  b. the complaint definition;  c. the decision on the complaint;  d. the reasons for any decisions made;  e. the details of any remedy offered to put things right;  f. details of any outstanding actions; and  g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Housing Complaints Policy - March 2024  *Complaint response letters | This information is set out in Section 6.12 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Council's response letters evidence compliance with section 6.19 of the Housing Ombudsman Code. Templates provide a consistent and compliance way to ensure key information is included.   |

|      |   |     |   | Complaint responses are all bespoke.   |
|------|---|-----|---|--|
|      |   |     |   | *supplementary information can be provided upon request.   |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Housing Complaints Policy -  March 2024 | This information is set out in Section 6.14 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024. |

# **Section 7: Putting things right**

| Code provision | Code requirement  | Comply:<br>Yes / No | Evidence   | Commentary / explanation  |
|----------------|---|---------------------|--|---|
| 7.1            | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: | Yes                 | Housing Complaints Policy - March 2024  Compensation and Remedy Policy | This information is set out in Section 8 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  The Council's Compensation and Remedy Policy outline the actions that can be taken |

|     | <ul> <li>Reconsidering or changing a decision;</li> <li>Amending a record or adding a correction or addendum;</li> <li>Providing a financial remedy;</li> <li>Changing policies, procedures or practices.</li> </ul> |     |  | to put things right when things go wrong.  |
|-----|--|-----|--|--|
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes | Housing Complaints Policy -  March 2024  Compensation and Remedy  Policy | This information is set out in Section 8 of the Housing Complaints Policy which is available on the Council's website and was last updated in March 2024.  To ensure consistency in outcomes, the Compensation and Remedy Policy provides guidance for when each remedy may be appropriate. The policy gives allowances for discretion to be used where appropriate. |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.                                    | Yes | Compensation and Remedy Policy  *Complaint Response Letters              | All complaint response letters include what the remedy being offered is, and by when this will be actioned. The Complaints Officer will ensure the proposed remedy is followed   |

|     |  |     |                                   | through to completion and this can be evidenced on the Housing Management System.  *supplementary information can be provided upon request.  |
|-----|--|-----|-----------------------------------|--|
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Compensation and Remedy<br>Policy | When drafting the Compensation and Remedy Policy, the Council has considered the guidance issued by the Housing Ombudsman. Complaints Officers consider this policy and the guidance from the Ombudsman when determining what remedy is appropriate. |

## **Section 8: Self-assessment, reporting and compliance**

| Code provision | Code requirement  | Comply:<br>Yes / No | Evidence | Commentary / explanation |
|----------------|---|---------------------|----------|--------------------------|
| 8.1            | Landlords must produce an annual complaints performance and service |                     |          |                          |

|     | improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and  f. any other relevant reports or publications produced by the Ombudsman in relation to the work of | Yes | Housing Complaints Policy - March 2024  Annual Complaint Handling Performance & Improvement Report 2024/2025  Housing and Communities Overview and Scrutiny Panel Meetings | This information is set out in Section 10 of the Housing Complaints Policy which is available on the Council's website and last updated in March 2024.  The Council's Annual Complaint Handling Performance & Improvement report is available from the Council's website.  The report has been scrutinised by the Portfolio Holder for Housing (MRC), considered by the Housing & Communities Overview & Scrutiny Panel and the Council's Executive at a Cabinet meeting. |
|-----|--|-----|--|---|
|     | Ombudsman in relation to the work of the landlord.   |     |  |   |
| 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 Policy - March 2024  Annual Complaint Handling Performance & Improvement Report 2024/2025   | This information is set out in Section 10 of the Housing Complaints Policy which is available on the Council's website and last updated in March 2024.  |

|     |  |     | Housing and Communities Overview and Scrutiny Panel Meetings   | The Council's Annual Complaint Handling Performance & Improvement Report 2024/2025 is published on the Council's website and the response from the Portfolio Holder for Housing (MRC), Housing & Communities Overview & Scrutiny Panel and the Council's Executive at a Cabinet meeting are available on the Council's website.                      |
|-----|--|-----|--|--|
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Housing Complaints Policy - March 2024  Housing Ombudsman Self Assessment Form 2022-2023  Housing Ombudsman Self Assessment Form 2023-2024 | This information is set out in Section 10 of the Housing Complaints Policy which is available on the Council's website and last updated in March 2024.  Self-assessments have been carried out on two previous occasions in 2022/2023 and 2023/2024 and are available on the Council's website.  Further self-assessments will be carried out as and |

|     |   |     | when required following any restructures, mergers and/or change in procedures.  |
|-----|---|-----|---|
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes | Should this be requested by<br>the Housing Ombudsman,<br>the Council will carry out the<br>required review and update<br>of the self-assessment.  |
| 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 | Should the situation arise, the Housing Ombudsman will be informed. Tenants would be informed via the Council's website, social media, email, text, and/or letter and both would be provided with a timescale by when the Council would return to compliance with the Code. |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply:<br>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                 | Annual Complaint Handling Performance & Improvement Report 2024/2025  *Learning from Complaints tracker | Service improvement results from complaints are included in the Annual Housing Complaint Performance & Improvement Report. An improvement action plan for 2025/2026 is also included in the Annual Report.  The action plan will be monitored monthly to ensure actions are completed.  All service improvements and learning from complaints identified are tracked on the learning from complaints tracker which can be provided upon request.  *supplementary information can be provided upon request. |

| 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 | Housing Annual Report   Nuneaton and Bedworth Borough Council  *Learning from Complaints tracker | Using the learning from complaints tracker, Service Managers use the intelligence identified and responses provided as a source to introduce positive changes in service delivery. This information is shared between Housing service areas at monthly meetings.  Any service improvements identified can be evidenced on the learning from complaints tracker which can be provided upon request.  All learning and service improvements identified will be published in the Council's annual report which are available on the Council's website.  *supplementary information can be provided upon request. |
|-----|--|-----|--|---|
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report  | Yes | Involved Residents   | The Council reports wider learning and service  |

|     | back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.   |     | Housing and Communities Overview and Scrutiny Panel Meetings | improvements to all stakeholders at Involved Tenant and Leaseholder meetings, Overview & Scrutiny Panel and at team meetings. This information will also be shared at Housing Scrutiny Panel meetings and agenda and minutes will be shared on the Council's website from January 2026.   |
|-----|--|-----|--|---|
| 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 | Cabinet Meeting  | The Assistant Director of Housing & Community Safety are the senior lead persons accountable for complaint handling within the Council's housing service to comply with section 9.4 of the Code.  Complaint Performance data including themes, trends, systemic issues, risks and policy/procedure changes are considered monthly by the Assistant Directors of Housing & Communities, and any actions are issued to the relevant Service |

|     |  |     |                       | Manager to progress to completion.  |
|-----|--|-----|-----------------------|---|
| 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 | Cabinet Meeting       | The Council's Member Responsible for Complaints (MRC) is the Portfolio Holder for Housing and Communities and Leader of the Council is appointed as the lead responsible person for complaints, and they support a positive complaint handling culture. This has not changed since 2024.  |
| 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. |     | Overview and Scrutiny | The Assistant Director for Housing & Community Safety meet with the MRC monthly to discuss complaint handling performance, trends, etc.  The MRC provides the Housing & Communities Overview and Scrutiny Panel with complaint performance data on a quarterly basis. This information is also presented to the Senior Management Team and Cabinet. |

|     |   |     |  | The MRC is provided with administrative support from the Council's Committee Services and has access to Housing staff at all levels.  |
|-----|---|-----|--|---|
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and  d. annual complaints performance and service improvement report. | Yes | Housing and Communities Overview and Scrutiny Panel Meetings | The Assistant Director for Housing & Community Safety meet with the MRC monthly to discuss complaint handling performance, trends, etc.  The MRC provides the Housing & Communities Overview and Scrutiny Panel with complaint performance data on a quarterly basis. This information is also presented to the Senior Management Team and Cabinet. |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;   | Yes |  | The Housing Complaints Policy has been adopted by staff in all housing service areas and compliance is monitored through monthly meetings between Assistant Directors for Housing &   |

| b. take collective responsibility for   | Community Safety and |
|---|----------------------|
| any shortfalls identified through       | Service Managers.    |
| complaints, rather than blaming others; |                      |
| and                                     |                      |
| c. act within the professional          |                      |
| standards for engaging with complaints  |                      |
| as set by any relevant professional     |                      |
| body.                                   |                      |