

Appendix A: Self-assessment form

Self-Assessment Introduction

Introduction

The London Borough of Lewisham is committed to maintaining high standards in complaint handling and continually improving our services. This self-assessment against the 2024 Complaint Handling Code, developed by the Housing Ombudsman, is a crucial part of our annual submission to the Housing Ombudsman Service. Our approach to this self-assessment is guided by the principles of compliance as outlined in the Code Compliance Framework.

Approach and Methodology

The self-assessment was carried out using a comprehensive approach that includes the following key components:

- **Desktop Review:** We conducted a thorough review of materials published on our external website and intranet to ensure transparency and accessibility.
- **Staff Interviews:** Engaging with staff allowed us to understand the practical application of our complaint handling procedures.
- **Policy and Procedure Review:** All relevant policies and procedures were reviewed to ensure alignment with the Ombudsman's requirements.
- **Complaints Performance Analysis:** We analysed our complaints handling performance using both qualitative and quantitative data, including resident feedback and transactional and perception surveys collected throughout the year.
- **Resident Engagement:** Feedback from our Resident Scrutiny Panel, workshops, and surveys provided valuable insights into our performance and areas for improvement.
- **External Guidance:** We adhered to guidance from the Housing Ombudsman and the Local Government Social Care Ombudsman, incorporating lessons from their casework.

Overview of Compliance

Our self-assessment indicates that Lewisham is partially compliant with the 2024 Complaint Handling Code. Compliance is measured in three areas:

- **Scrutiny and Oversight:** We have produced an annual complaints performance and service improvement report, though there are challenges in obtaining feedback from the Member Responsible for Complaints and Scrutiny due to the pre-election timetable. The draft reports will be reviewed at the next available Cabinet meeting in October 2024.
- **Policy Compliance:** While most of our policies are up-to-date, the Compensation, Reimbursement, and Remedies policy requires finalisation and staff training, which is scheduled for completion by September 2024.
- **Practice Compliance:** Feedback indicates that we are not consistently meeting our targets for complaints handling. This has been prioritised in our Housing Transformation Programme, with significant improvements planned by March 2025.

Commitment to Improvement

In line with Lewisham's values of being ambitious, inclusive, collaborative, accountable, and trustworthy, we are dedicated to improving our complaint handling processes. We take responsibility for our actions and are committed to using resident feedback to drive continuous improvement.

This self-assessment not only highlights our current compliance status but also outlines our commitment to addressing identified areas for improvement to ensure that we deliver high standards of service to our residents.

How compliance is measured	Lewisham Compliance Y/N	Actions/ Mitigations / Dates
Challenge and scrutinise performance at governing body and publish outcome	Partially compliant We are unable to have feedback from our Member Responsible for Complaints and Scrutiny due to the pre-election timetable.	A draft self-assessment, annual complaints report, and service improvement report will be published on our website and submitted to the Housing Ombudsman by the submission date. They will be reviewed at the next available Cabinet in October 2024 . Following that the updates will be published and submitted.
Policy – are our policies up-to-date and in line with guidance from the	Partially compliant We do not have an up-to-date Compensation	A draft Compensation, Reimbursement and Remedies policy will be finalised by July 2024 .

Ombudsman	policy online and that staff can use following the transition from Lewisham Homes.	A procedure document and training will be developed by September 2024 .
Practice – is our complaint handling in line with our policies and procedures?	<p>Partially compliant</p> <p>Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are consistently not meeting our targets for complaints handling.</p>	<p>Complaints Handling has been prioritised as one of the key workstreams in the Housing Transformation Programme. A new scope of work was agreed by the Board in May 2024. The areas of work are; Governance and reporting, Process and policies, Assessments, Systems and People.</p> <p>The work is scheduled to be completed by March 2025.</p>

Section 1: Definition of a complaint

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>	Y	Complaints policy section 2.1	Further actions <ul style="list-style-type: none"> - Ensure that the correct version of the policy has been circulated and updated on our websites and with our partners. June 2024 - Ensure there is a system in place for regularly reviewing the information on our sites. June 2024
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.	Y	Complaints policy section 2.10	Further actions <ul style="list-style-type: none"> - Fresher training on the complaint handling processes to be roll-outed by September 24.
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	Y	Complaints policy Section 2.3. The definition of a service request is not specified in the Complaints policy in this exact way but is	Further actions <ul style="list-style-type: none"> - Amend the Complaint policy to include a definition of a service request. July 2024 - Implement updates to iCasework (complaints management system) for better record keeping and

Section 1: Definition of a complaint				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	not complaints, but must be recorded, monitored and reviewed regularly.		referenced. For further clarity, we will update the policy to include the Housing Ombudsman definition. Service requests are captured as enquiries from residents or their representatives including elected members.	monitoring of complaints. August 2024 - Agree mechanism to capture service requests going forward. September 2024
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.	Y	Complaint policy in section 4.2	
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	Y	The outsourced provider of satisfaction surveys has been briefed on the different ways of making a complaint to LH. The company uses a flagging system to pass any serious	

Section 1: Definition of a complaint				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	details of how residents can complain.		concerns identified while undertaking the survey with residents for action by the relevant service area.	

Section 2: Exclusions

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	Y	Complaint policy section 2.5	Further Actions - Review cases that have been rejected/ refused to ensure this is happening in practice. August 2024
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. 	Y	Complaint policy section 2.3	The Complaints policy sets out the circumstances where it is not the appropriate mechanism for addressing some issues. LH will never unreasonably refuse to accept or escalate a complaint through all stages of the complaint's procedure. Where this is the case, clear and valid reasons for the decision will be provided, together with the resident's

Section 2: Exclusions				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> 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. 			right to take that decision to be taken to the Housing Ombudsman.
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.	Y	Complaint policy section 2.9	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Y	Complaints policy section 2.5. This is stated explicitly in our policy. The revised procedure will need to guide staff how to reject a complaint, including giving clear and valid reasons. It should include the details for	Further Actions - Along with procedure documents, create template letters to ensure consistency with the revised approach. September 2024

Section 2: Exclusions				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			the resident to contact the Ombudsman if unhappy or requiring additional info/support.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Complaints policy section 2.5	

Section 3: Accessibility and Awareness

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.	Y	Complaints policy section 2.11 Residents can complain in a number of ways including telephone, face to face with a member of staff, by email, by letter, online via the Lewisham Council's website and by social	Despite there being a range of ways residents can complain, recent feedback from the Resident Scrutiny panel has shown that residents find the process longwinded and would like to see more options including door-to-door, surgeries, online portal and during estate walkabouts. They have also requested greater accessibility for residents with communication challenges.

Section 3: Accessibility and Awareness				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			media.	Further Action - We will carry out an Equality Analysis Assessment (EAA) on the changes to the complaints process by August 2024 and - Ensure all relevant officers have completed the mandatory Equalities e-learning module by December 2024.
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.	Y	Complaints policy section 2.11.	
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.	Y	Complaint volumes have increased significantly. (see complaints performance report). We welcome complaints and encourage	
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 times for responding. The policy must also be	Y	The policy and details of the process can be accessed via our website. Link Lewisham Council - Complaints	

Section 3: Accessibility and Awareness				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	published on the landlord's website.			
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	Complaints policy section 5 and section 13.	
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.	Y	Complaints policy section 2.7	
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.	Y	Complaints policy section 5	

Section 4: Complaint Handling Staff

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.	Y	The 'complaints officer' is designated as the Director of Resident Engagement and Services. The Housing Complaints and Feedback Team (HCF) is responsible for administering the Housing complaints process for LBL i.e. logging, allocating and monitoring all cases. In addition, a specialist Repairs Complaints team responds to complaints to the Housing Services directorate. At present the point of contact for all Ombudsman enquiries is the Corporate Complaints Team. This is a legacy arrangement from Lewisham Homes and is under review following the change in organisational arrangements and the increase in volume of Ombudsman complaints.	Further Actions - Review staffing arrangements considering workloads, roles, and responsibilities to ensure the complaints service is adequately resourced. September 2024
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.	Y	As a senior officer, the Director of Resident Engagement and Services has the authority and autonomy to facilitate prompt resolution of complaints. There are weekly and monthly meetings with the complaints officer to discuss progress against complaints and to ensure disputes can be resolved.	
4.3	Landlords are expected to	N	Whilst complaints handling is prioritised, we are	Further Actions

Section 4: Complaint Handling Staff				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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		unable to evidence having a culture of learning from complaints and need to review the resourcing arrangements for the complaints service to meet the demands following an increase in both complaints and Housing Ombudsman Casework. In 2023/24 there were 24 determinations, 17 with negative findings in complaint handling. To address this complaints handling is one of the four workstreams of the Housing Transformation Programme, with the next phase being agreed by the Programme Board in May 2024. Two areas of work in the programme are a) improve reporting to facilitate learning from complaints August 2024) and reviewing the staffing structure (September 2024).	<ul style="list-style-type: none"> - Review staffing arrangements considering workloads, roles, and responsibilities to ensure the complaints service is adequately resourced. September 2024 - Roll-out training programme on updated policies and procedures (Complaints and Compensation, Reimbursements and Remedies policy) September 2024

Section 5: The Complaint Handling Process

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints	Y	Complaint policy.	

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	covered by this Code. Residents must not be treated differently if they complain.			
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.	Y	Complaint policy Section 4.	Further Action - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff. September 2024
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.	Y	Complaint policy Section 4.	The policy was updated in February 2024, following the update to the Code to remove Stage 3, an independent adjudicator stage.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or	Y	Complaint policy Section 4.	Complaints are responded to and dealt with by our internal complaints handling teams. We no longer have a Stage 3 independent adjudicator stage in line with the provisions of the code.

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N	Although we currently monitor the performance of our PFI (Private Finance Initiative) and TMO (Tenant Management Organisation) partners through monthly performance meetings, more work is needed to ensure all our third parties are following the updated provisions of the Code, including our supply chain as appropriate. This includes ensuring third parties are trained along the same timelines as our internal staff and that this can be evidenced.	Further Action - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2,	Y	Complaint policy Section 4.3 This is set out in our policy documents but is not applied	Further Action - More guidance to be provided to staff to ensure they are all aware of the new Code and

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		consistently.	complaints policy. A procedure document and templates with training to be given to staff and partners - Roll-out training programme on updated policies and procedures (Complaints and Compensation, Reimbursements and Remedies policy) September 2024. September 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.	Y	Complaint policy Section 4.3 This is set out in our policy documents but is not applied consistently.	Further Action - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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.	Y	Complaint policy Section 4 This is set out in our policy documents but is not applied consistently.	Further Action - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>b. give the resident a fair chance to set out their position.</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			
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.	N	Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are consistently not keeping residents informed of the progress of their complaints.	<p>Further Action</p> <p>- More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024</p>
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	N	LBL have a vulnerability policy in place - (website - https://lewisham.gov.uk/myserVICES/housing/council-homes/policy-library) - and procedures in place to ensure we meet our obligations however feedback from residents as part	<p>Further Action</p> <p>- More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024</p> <p>- Develop approach to Knowledge and Information Management. September 2024</p>

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		of the Resident Scrutiny panel review into complaints and Housing Ombudsman casework (202222057), we have been encouraged to review our processes and ensure all staff are suitably trained. This will be incorporated into the training plan to be rolled out by December 2024.	- Review existing Vulnerability policy and approach to 'reasonable adjustments'. This work is to be carried out alongside the Knowledge and Information strategy and damp and mould work. March 2025
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.	Y	Complaints Policy section 2.5	
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	N	Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are not consistently keeping good records and relevant documentation which has led to	We currently store records, communication, and notes on the corporate complaints management system. There have been a number of complaints and Housing Ombudsman determinations that have highlighted poor record-keeping as an area of maladministration.

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		detriment for our residents.	<p>To address this, we have implemented a new Housing Management System, have invested in developing our iCase system and have started work on developing a data and Knowledge and Information strategy. Training for staff is also being developed and delivered with the roll-out of the first phase due to be complete in September 2024.</p> <p>Further Action</p> <ul style="list-style-type: none"> - Complete the implementation of updates to iCasework (complaints management system) for better record keeping and monitoring of complaints. (August 24) - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024 - Develop approach to Knowledge and Information Management. September 2024 - Complete the maximisation of the new Housing Management System capabilities to enable optimal delivery from Housing Management Services to their residents. March 2025
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage	N	We are unable to evidence compliance with this provision. Resident feedback, Housing Ombudsman casework and	<p>Further Action</p> <ul style="list-style-type: none"> - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		performance information show that in practice, we are not consistently resolving complaints at an early stage. Following the update to the Complaints Policy, further training on the expectations will be given to staff on this through a procedure document and training. September 2024	- More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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.	Y	Unacceptable behaviour policy on website https://lewisham.gov.uk/my-services/housing/council-homes/policy-library	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the	N	Despite having policies in place, we are unable to evidence this is happening consistently as we are not capturing the information. Going forward this will be incorporated into our reporting, through the work we	Further Action - Complete the implementation of updates to iCasework (complaints management system) for better record keeping and monitoring of complaints. August 24 - More guidance to be provided to staff to ensure they are all aware of the new Code and

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Equality Act 2010.		are doing on data and Knowledge and Information Management. (September 2024)	complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024 - Develop approach to Knowledge and Information Management. September 2024 - Complete the maximisation of the new Housing Management System capabilities to enable optimal delivery from Housing Management Services to their residents. March 2025

Section 6: Complaints Stages

Stage 1

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	N	While this is stated explicitly in our policy, in practice more work needs to be done to empower staff to resolve complaints early. An updated	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy.

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	resolved promptly, and an explanation, apology or resolution provided to the resident.		Compensation, Reimbursements and Remedies policy was agreed in principle in May 2024 to meet the guidelines from the Housing Ombudsman and Local Government Ombudsman. This is being reviewed by internal stakeholders and service Heads. A procedure document will be developed to accompany the policies. (Sep 24)	A procedure document and templates with training to be given to staff and partners. September 2024
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Y	Complaints policy section 4.3.1. In practice we do not currently report or monitor the number of acknowledgments we send out on time. This will need to be added to the reporting schedule so that we can monitor.	<p>Further Action</p> <ul style="list-style-type: none"> - Complete the implementation of updates to iCasework (complaints management system) for better record keeping and monitoring of complaints. August 24 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	N	This is incorporated in our Complaints Policy section 4.3.4. In practice. In 2023/24, we responded to 88% of Stage 1 complaints within the agreed timescales and in our Housing Ombudsman casework, failures, and maladministration in respect to complaints handling was found in 17 out of the 24 determinations.	<p>Further Action</p> <ul style="list-style-type: none"> - Complaints handling improvement has been prioritised and is one of the four key workstreams of the Housing Transformation Programme. A new scope was agreed in May 2024 for the next phase up until December 2024. Workstreams include, training, improvement to systems and a review of staffing and resources. December 2024 - The council-wide Complaints Handling Improvement Project (CHIP) begun in April 2024 to ensure we meet the updated requirements for the Local Government and Social Care Ombudsman. The project is due to run until December 2024 and objectives are policy and procedure updates, development of the complaints management software, and corporate training (e-learning) and templates for use. December 2024
6.4	Landlords must decide whether an extension to this timescale is needed	N	This is incorporated in our Complaints Policy	<p>Further Action</p> <ul style="list-style-type: none"> - Finalise updates to the Complaints

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		section 4.3.5. In practice we cannot evidence that this is happening consistently. Following the update to the Complaints Policy timelines, further training on the expectations will be given to staff on this through a procedure document and template documents to use to ensure consistency throughout the service.	Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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.	Y	This is incorporated in our Complaints Policy section 4.3.5. Details of how to contact the Ombudsman are included in all our communications regarding complaints. Need to ensure that this is applied	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			consistently by providing training and template documents.	
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.	N	Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are consistently not keeping residents informed of the progress of their complaints and have poor practices in respect to record keeping and tracking outstanding actions. Communication - Further training on the expectations for communicating with residents will be reinforced with staff through a procedure document and training. Record Keeping - A review of our practices	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024 - Develop approach to Knowledge and Information Management. September 2024

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			is underway in development of a data and Knowledge and Information Management strategy.	
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.	N	This is incorporated in our Complaints Policy section 4.3.4. In practice, we have had several determinations against us for complaints handling and there have not been templates used consistently across the service. September 2024	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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	Y	This is incorporated in our Complaints Policy section 4.3.3.	

Section 6: Complaints Stages: Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Y	This is incorporated in our Complaints Policy section 4.3.4. In practice, we have had several determinations against us for complaints handling and templates have not been used consistently across the service.	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Stage 2

Section 6: Complaints Stages: Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Y	This is incorporated in our Complaints Policy section 4.3.6.	

Section 6: Complaints Stages: Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Y	Complaints policy section 4.4.1. In practice we do not currently report or monitor the number of acknowledgments we send out on time. This will need to be added to the reporting schedule so that we can monitor.	Further Action - Complete the implementation of updates to iCasework (complaints management system) for better record keeping and monitoring of complaints. Update reports to include capturing acknowledgements sent out on time. August 24
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.	Y	Complaints policy section 4.4. Complainants are no longer required to give their reasons for wanting their complaint to be escalated to Stage 2.	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	Complaints policy section 4.4.1.	A different officer or team is assigned to deal with a case from the one that dealt with it at Stage 2.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of	N	This is incorporated in our Complaints Policy	Further Action - Complaints handling improvement

Section 6: Complaints Stages: Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the complaint being acknowledged.		section 4.3.4. In practice. In 2023/24, we responded to 87% of Stage 2 complaints within the agreed timescales and in our Housing Ombudsman casework, failures, and maladministration in respect to complaints handling was found in 17 out of the 24 determinations.	has been prioritised and is one of the four key workstreams of the Housing Transformation Programme. A new scope was agreed in May 2024 for the next phase up until December 2024. Workstreams include, training, improvement to systems and a review of staffing and resources. December 2024 - The council-wide Complaints Handling Improvement Project (CHIP) begun in April 2024 to ensure we meet the updated requirements for the Local Government and Social Care Ombudsman. The project is due to run until December 2024 and objectives are policy and procedure updates, development of the complaints management software, and corporate training (e-learning) and templates for use. December 2024
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	N	This is incorporated in our Complaints Policy section 4.4.4. In practice we cannot evidence that this is happening	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to

Section 6: Complaints Stages: Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	working days without good reason, and the reason(s) must be clearly explained to the resident.		consistently. Following the update to the Complaints Policy timelines, further training on the expectations will be given to staff on this through a procedure document and template documents to use to ensure consistency throughout the service. (Sep 24)	staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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.	Y	This is incorporated in our Complaints Policy section 4.3.5. Details of how to contact the Ombudsman are included in all our communications regarding complaints. Need to ensure that this is applied consistently by providing training and template documents.	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
6.17	A complaint response must be provided to the resident when the answer to the	N	Resident feedback, Housing Ombudsman	Further Action - Finalise updates to the Complaints

Section 6: Complaints Stages: Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		casework and performance information show that in practice, we are not consistently responding appropriately to complaints. Communication - Further training on the expectations for communicating with residents will be reinforced with staff through a procedure document, templates and better use of our systems and training.	Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024
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.	N	Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are not consistently responding appropriately to complaints. Communication -	Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 6: Complaints Stages: Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Further training on the expectations for communicating with residents will be reinforced with staff through a procedure document, templates and better use of our systems and training.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied. 	N	Details of how to escalate the complaint to the Ombudsman is included. However, what residents can expect to receive as a response to their complaint is not currently detailed in our Complaints Policy for Stage 2 in the same way it for Stage 1. This will be incorporated in our Complaints Policy section 4.3.4. Templates will be developed to be used across the service to	Further Action <ul style="list-style-type: none"> - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 6: Complaints Stages: Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			ensure consistency in our approach. (Sept 24)	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	Complaints policy section 4. Further staff training to be developed to ensure ongoing compliance.	<p>Further Action</p> <ul style="list-style-type: none"> - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 7: Putting things right

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	N	While this is stated explicitly in our complaints policy,	<p>Further Action</p> <ul style="list-style-type: none"> - Finalise updates to the Complaints Policy and the Compensation,

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<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>section 3, in practice more work needs to be done to empower staff to resolve complaints early.</p> <p>An updated Compensation, Reimbursements and Remedies policy was agreed in principle in May 2024 to meet the guidelines from the Housing Ombudsman and Local Government Ombudsman. This is being reviewed by internal stakeholders and service Heads. A procedure document will be developed to accompany the policies. (Sep 24)</p>	<p>Reimbursements and Remedies policy. July 2024</p> <p>- More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	N	While this is stated explicitly in our policy, in practice more work needs to be done to empower staff to resolve complaints	<p>Further Action</p> <p>- Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024</p> <p>- More guidance to be provided to</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>early. An updated Compensation, Reimbursements and Remedies policy was agreed in principle in May 2024 to meet the guidelines from the Housing Ombudsman and Local Government Ombudsman. This is being reviewed by internal stakeholders and service Heads. A procedure document, training and templates will be developed to accompany the policies. September 24</p>	<p>staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024</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>	N	<p>Resident feedback, Housing Ombudsman casework and performance information show that in practice, we are consistently not keeping residents informed of the</p>	<p>Further Action - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of the new Code and complaints policy. A procedure document and templates</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>progress of their complaints and have poor practices in respect to record keeping and tracking outstanding actions.</p> <p>Communication - Further training on the expectations for communicating with residents will be reinforced with staff through a procedure document and training.</p> <p>Record Keeping - A review of our practices is underway in development of a data and Knowledge and Information Management strategy.</p>	<p>with training to be given to staff and partners. September 2024</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	Guidance from the Housing Ombudsman has been used to develop our Compensation, Reimbursements and Remedies policy	<p>Further Action</p> <ul style="list-style-type: none"> - Finalise updates to the Complaints Policy and the Compensation, Reimbursements and Remedies policy. July 2024 - More guidance to be provided to staff to ensure they are all aware of

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				the new Code and complaints policy. A procedure document and templates with training to be given to staff and partners. September 2024

Section 8: Self-assessment, reporting and compliance

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ol 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 	Y	https://lewisham.gov.uk/myservices/housing/council-homes/complaints/self-assessment	The self-assessment against the Complaint Handling Code is carried out on an annual basis. The outcome is reported to the Executive Leadership team, the Board/Service & Performance Committee and published on the LBL website for transparency. An annual report is produced on the LBL complaints service and handling performance, which is published on the website for residents' information and includes reference to the self-assessment document.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	N	<p>The election impacted timeline for full response and consultation by the 30 June 2024 deadline. The statutory reports will be published online, and a submission made by the deadline. They will be reviewed in September 2024, the next available Cabinet. The report will be scrutinised and published by October 2024.</p>	<p>Further Action</p> <ul style="list-style-type: none"> - Present statutory reports to the MRC (Member Responsible for Complaints) and Cabinet for scrutiny. October 2024 - Publish response and any updates to the statutory reports as appropriate on the Council Website. October 2024

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	A self-assessment was completed in draft in January 2024 following the merger. It was not published on our website in anticipation of the new guidelines in February 2024. The latest assessment was completed in June. 2024 in line with the requirement of the new Code published in February 2024.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	We will review and update our self-assessment as directed by the 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 must provide a timescale for returning to compliance with the Code.	Y		

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.	Y	Case Reviews, performance reporting, resident feedback and Housing Ombudsman casework have been used to inform our Housing Transformation Programme and the corporate Complaints Handling Improvement Project.	The information collected from complaints is an invaluable tool to identify where services are not meeting residents' expectations. Analysis of the themes and trends highlights priorities for services and where best to apply resources. Information from our complaints have influenced the work we are prioritising in the Housing Transformation Programme. The outcome of the meetings with Heads of Service to discuss complaints and the learning from them is regularly reported to the Executive Leadership team and the Service & Performance Committee. Updates on the lessons learnt from complaints are included in the annual complaints report produced for residents and published on the Council website.
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.	Y	Case Reviews, performance reporting, resident feedback and Housing Ombudsman casework have been used to inform our Housing	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Transformation Programme and the corporate Complaints Handling Improvement Project.	
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.	Y	Complaints performance is discussed at the following forums Scrutiny panel, website, monthly meetings, Executive Management Team, Directors Management Team, Corporate Assurance Board, and the Housing Transformation Board	
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.	Y	The lead for complaints is the Director of Resident Engagement and Services.	
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	Y	Lead Member for Housing, Monitoring Officer, Lead Member for Complaints	Two Board Members have been appointed as leads for complaints, The Lead Board Members for Complaints also have regular

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			meetings with the managers responsible for the complaints service to monitor performance, understand any challenges and provide input from the Board.
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.	Y	Quarterly reports on the complaints service are received by the Service & Performance Committee to comply with this requirement. The Lead Board Members for Complaints also meets regularly with officers to discuss any specific cases, challenges and highlight any additional/specific information related to complaints the Committee would like to receive. The Lead Member for Housing meets with the Complaints Officer to discuss complaints performance.	
9.7	As a minimum, the MRC, and the governing body (or equivalent) must	Y	Quarterly reports on the complaints service	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 		<p>are received by the Service & Performance Committee to comply with this requirement. The Lead Board Members for Complaints also meets regularly with officers to discuss any specific cases, challenges and highlight any additional/specific information related to complaints the Committee would like to receive. The Lead Member for Housing meets with the Complaints Officer to discuss complaints performance.</p>	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for 	Y	<p>This has been added to the objectives for staff in the Resident Engagement and Services division and the appraisal objectives for 2024/25.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			