

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 1.3 states “A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of actions by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents. You do not have to use the word ‘complaint’ for it to be treated as such, even if the handling of a service request remains ongoing. Raising a complaint will not prevent, stall, or impact actions needed to resolve any immediate issues.”</p> <p>Section 2.4 of our complaints policy states” Swindon Borough Council gives any resident who expresses dissatisfaction a choice to make a complaint; raising a complaint will not prevent, stall, or impact actions needed to resolve any immediate issues.”</p>	

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	<p style="text-align: center;"><a href="#"><u>Complaint Policy</u></a></p> <p>Section 1.3 states <i>"You do not have to use the word 'complaint' for it to be treated as such"</i></p> <p style="text-align: center;">And</p> <p><i>"Any residents who express any dissatisfaction will be given the choice to make an official complaint. A complaint that is submitted via a third party or representative must still be handled in line with the complaints policy."</i></p>	
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	Yes	<p style="text-align: center;"><a href="#"><u>Complaint Policy</u></a></p> <p>Section 1.3 states <i>"A service request is a request which requires action to be taken to put something right."</i></p> <p>Section 2.4 defines the difference between service requests and complaints in more detail</p>	

	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.			
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	<p style="text-align: center;"><a href="#"><u>Complaint Policy</u></a></p> <p>Section 2.4 states <i>“However, if further enquiries are needed to resolve the matter, or if the resident requests it, the issue will be logged as a complaint. Swindon Borough Council gives any resident who expresses dissatisfaction a choice to make a complaint; raising a complaint will not prevent, stall, or impact actions needed to resolve any immediate issues.”</i></p> <p style="text-align: center;">AND</p> <p><i>“A complaint can be raised in response to a service request, whilst this service request is still ongoing.”</i></p>	

1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>Tenant satisfaction measure surveys include the following:</p> <p><i>"If, after completing this survey, you would like to make a complaint about the service you have received, please contact us:</i></p> <p><i>Online via the Council's website @ <a href="http://www.swindon.gov.uk">www.swindon.gov.uk</a> or by clicking on the link</i></p> <p><i>(<a href="https://www.swindon.gov.uk/info/20022/contacting_us/463/complaints_and_feedback">https://www.swindon.gov.uk/info/20022/contacting_us/463/complaints_and_feedback</a>)</i></p> <p><i>Phone on 01793 445500</i></p> <p><i>Post to Customer Services Reception Wat Tyler House Princes Street</i></p> <p><i>Swindon SN1 2JG</i></p> <p><i>In Person by visiting our customer hubs in our five core libraries where our multi-skilled library staff can support you</i></p> <p><i>To read our Customer feedback and complaints handling policy please visit:</i></p> <p><i><a href="https://www.swindon.gov.uk">https://www.swindon.gov.uk</a></i></p>	

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Complaint Policy</a>  All complaint refusals from the service area are reviewed and the refusal approval or rejection is held within the complaints team.  Refusal reasons are all listed on the internal complaints system and recorded as such for audit.	
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"> <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</li> </ul>	Yes	<a href="#">Complaint Policy</a>  Section 1.4 details policy exclusions  Section 2.1 also states “Any exclusions that apply to this policy are clearly set out within section 1.4 and they are in line with provision 2.2 of Housing Ombudsman Complaint Handling Code.”	

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 1.3 states <i>“All complaints should be submitted within 12 months of the incident that caused the problem or when the problem first occurred, or when you became aware of the problem. However, we will exercise discretion to extend this, depending on the circumstances where it may have been difficult for the complaint to have been submitted earlier, and providing we are able to investigate the facts of the case.”</i></p> <p>Section 1.4 states <i>“Our Council must accept a complaint or escalation unless there is a valid reason not to do so. If we decide not to accept a complaint or escalation, we will provide evidence and reasoning. Each</i></p>	<p>There is no restriction on our complaints system in regards to date. All complaints are reviewed by the complaints team as well as the service are and any dating over 12 months are reviewed on a case-by-case basis.</p>

			<i>complaint and/or escalation will be considered on its own merits.”</i>	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 1.4 states <i>“If your complaint includes one of these exclusions, we will explain this and advise you of any statutory procedures with regard to your complaint.</i></p> <p><i>If your complaint or escalation is not accepted, you will be provided with an explanation, setting out the reasons why it is not suitable for the complaints process and the right to take that decision to the Ombudsman.”</i></p>	A mandatory field within our complaints system is enabled. This requires us to input reasons why a complaint is not accepted. This is then recorded by us for audit purposes as well as confirms this detail/information with the resident via email and logs this on their customer portal.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 1.4 states <i>“Each complaint and/or escalation will be considered on its own merits.”</i></p> <p>All complaints are reviewed by the complaints team. Alongside the new process as included in Code Provision evidence 5.6 &amp; 5.7, the new review and acknowledgement strategy</p>	



			<p>requires the council to define and consider each complaint in more detail.</p> <p>In addition, we record, monitor and audit exclusions. The complaints team are notified of all exclusions via the complaints system; all exclusions are then reviewed by the complaints team to ensure compliance.</p> <p>Included in our training for managers we look at why people may not be able to complain independently, importance of exploring desired resolutions as this may give further insight in to what the tenant is complaining about &amp; whether this information would change the decision on excluding the complaint.</p>	
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Online information on different channels to <a href="#">make a complaint</a></p> <p><a href="#">Complaint Policy</a></p> <p>Section 1 states <i>“We promise to listen, log any feedback correctly, and treat all feedback honestly, politely, confidentially and fairly without discrimination, in accordance with data protection legislation.</i></p> <p><i>We want services to be as open and accessible as possible. Council information, including this policy, can be produced in a range of languages and formats (such as large print, Braille or other accessible formats). You can also find an <a href="#">easy-to-read leaflet</a> available to download on our website. Please contact the department responsible for the information. Alternatively, email</i></p>	

			<p><i>your enquiry to customerservices@swindon.gov.uk or call 01793 445500. We will work with you to make sure that you have the information you need, in a way you understand.”</i></p> <p><u><a href="#">Easy-to-read leaflet</a></u></p> <p><i>Section 1.5 states “We fully appreciate and understand that some people may need advice and support from an independent advocate to make their complaint, to escalate an ongoing issue, or to understand our procedures and outcomes. We also understand that additional support may be required for people who are vulnerable or have communication difficulties due to finding it difficult to express their views, or where English is not their first language.</i></p> <p><i>Below are the contact methods for raising a complaint, if you should experience any issues when trying to make a complaint, or require any further assistance or adjustments.”</i></p>	
3.2	Residents must be able to raise their complaints in any way and with any	Yes	Residents can raise their complaint by	Mandatory training for managers to be

	<p>member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>		<ul style="list-style-type: none"> <li>- Calling into our contact centre</li> <li>- Completing a form online</li> <li>- Customer Service staff are based at our central library who are trained in raising complaints</li> <li>- Asking any frontline housing colleague to support               <ul style="list-style-type: none"> <li>- Attending housing engagement events “Let’s Talk housing”</li> </ul> </li> </ul> <p>To support all internal staff to raise a complaint on behalf of a resident we have:</p> <ul style="list-style-type: none"> <li>- Provided complaint process maps on our internal intranet Provide regular training ‘drop-in’ sessions for all staff</li> <li>- Provided a training package for all managers to be implemented as mandatory training on our internal learning system</li> </ul>	<p>implemented by January 2026. This will form part of enrolment for all new managers going forward as well as current managers</p>
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a</p>	Yes	<ul style="list-style-type: none"> <li>– Number of complaints are benchmarked</li> <li>– Complaints are promoted as a learning opportunity</li> </ul>	

	sign that residents are unable to complain.		<ul style="list-style-type: none"> <li>– Complaint numbers are published</li> <li>– Residents are directed to the complaint policy and process at any sign of dissatisfaction</li> </ul>	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<a href="#">Complaint Policy</a>  Section 1 & section 1.5 evidence our commitment to accessibility and the channels in which complaints can be made.  <a href="#">Easy-to-read leaflet</a>  Section 2 evidences the 2-stage process  WEBSITE LINK	
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	Complaints data is published on our <a href="#">website</a> on a quarterly and annual basis.  The information is also shared via our <a href="#">Tenant Newsletter</a> "Tenant Focus - for council housing tenants", as well as in the <a href="#">Tenant Handbook</a>	

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	<p><a href="#">Complaint Policy</a></p> <p>Section 1.5 states “<i>We fully appreciate and understand that some people may need advice and support from an independent advocate to make their complaint, to escalate an ongoing issue, or to understand our procedures and outcomes. We also understand that additional support may be required for people who are vulnerable or have communication difficulties due to finding it difficult to express their views, or where English is not their first language.</i>”</p>	
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.		<p>Guidance on rights to access the Housing Ombudsman service is included in sections 1.4, 2.1, 2.6, 2.7 &amp; 2.8 of our complaints policy.</p> <p>Information and guidance is also available:</p> <ul style="list-style-type: none"> <li>– On our <a href="#">website</a>:</li> <li>– In the <a href="#">Tenant Handbook</a></li> <li>– Within all Housing Complaint responses (and is part of the standard template used for</li> </ul>	

			each stage of a housing complaint) – In the acknowledgement email sent via our complaints system – In the response email sent via our complaints system for stage 1 & 2 complaints	
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#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	– Complaints Resolution Manager – In post – Complaints Officer – In post – Customer Services team link Officer – In post – Head of Housing Improvement and Strategy – In post	
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	Yes	Weekly Housing Complaints Meeting chaired by the Complaints Officer	

	autonomy to act to resolve disputes promptly and fairly.			
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Please refer to evidence and commentary provided in code provision 3.2	<p>We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.</p> <p>The estimated delivery date for this workflow is by 31/10/2025</p>

### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<p><a href="#">Complaint Policy</a></p> <p>Reviewed policy August 2025 now live as of 25/09/2025. Following a review from the Housing Ombudsman sent on 08/08/2025, recommendations have been put in place</p> <p>All complaints are handled in-line with the only complaints policy</p>	



			Complaints are held in a separate system and are not able to be widely accessed by all users to ensure additional element of confidentiality where possible	
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	<a href="#">Complaint Policy</a>  Following a review from the Housing Ombudsman sent on 08/08/2025, our policy no longer refers to the Housing Ombudsman as the 'third-stage' in the complaints process.	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="#">Complaint Policy</a>	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy no longer refers to the Housing Ombudsman as the 'third-stage' in the complaints process
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	Yes	<a href="#">Complaint Policy</a>  Section 2.5	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on third-party complaints

	this Code. Residents must not be expected to go through two complaints processes.			relating to Housing, has been reviewed and amended
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="#">Complaint Policy</a> Section 2.5	Any complaints raised against third parties are dealt with through our Housing Complaint process. We own the complaint and do not delegate out to contractors
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	<a href="#">Complaint Policy</a> Section 2.6 & 2.7 Complaint acknowledgement email has been amended as of 22/09/2025. Complaint definition is part of the Housing Complaint Response Template (Stage 1 and 2) Complaint definition is also required to resolve the complaint on complaints system	Following a review from the Housing Ombudsman sent on 08/08/2025, recent work has been undertaken by the council to update the process and communication when reviewing and acknowledging a complaint. This went live on 22/09/2025 With the complaints team now updating each complaint to: <ol style="list-style-type: none"> <li>1. clarify landlord understanding of complaint</li> <li>2. customer outcomes as they are understood</li> </ol>

				<p>3. what aspects of the complaint the landlord is and is not responsible for</p> <p>4. Building this in to case acknowledgement email back to complainant</p>
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	<a href="#">Complaint Policy</a> Section 2.6 & 2.7	Refer to evidence and commentary on code provision 5.6
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<p>Regular audits of complaints take place to ensure independence and highlight and learn from any areas of concern.</p> <p>Complaints team review all complaints before assignment to ensure independence and any conflict of interest</p>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with	Yes	<a href="#">Complaint Policy</a>	

	the resident suitable intervals for keeping them informed about their complaint.		<p>Section 2.6 &amp; 2.7 state <i>“If, for any reason the response will fall outside of the extended timescales (as set out in Housing Ombudsman Complaint Handling Code), the service will contact you and agree with you, suitable intervals for updating you on the progress of your complaint and confirm the expected timescale you should receive a response.</i></p> <p><i>If your complaint response falls outside of the extended timescales, you are entitled to approach the Housing Ombudsman.”</i></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 well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>Reasonable adjustments are an optional element to housing complaints when they are raised. The form states:” Please <i>provide details of any reasonable adjustments you would like to disclose as part of this complaint (optional)</i>”</p> <p>These are available to see on complaint reports when required and are visible to those who have access to the complaint case</p>	

5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<a href="#">Complaint Policy</a> Section 1.4	
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	The complaint system keeps a full and auditable trail of the complaint including the original complaint, date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Regular complaint audits take place by Complaint Officers.  Concerns regarding response time to be escalated to Complaint Resolution Manager.	
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	Yes	<a href="#">Behaviour Policy</a>	This policy is currently being reviewed

	must keep restrictions under regular review.			
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	<a href="#">Behaviour Policy</a>	This policy is currently being reviewed

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints team review and acknowledgement process highlights the vulnerabilities and/or risk.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received</u></b> .	Yes	<a href="#">Complaint Policy</a> Section 2.6 & 2.7	All complaint SLA's are automatically assigned via the complaints system when the complaint is raised
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaint Policy</a> Section 2.6	All complaint SLA's are automatically assigned via the complaints system when the complaint is raised
6.4	Landlords must decide whether an extension to this timescale is needed		<a href="#">Complaint Policy</a>	Following a review from the Housing Ombudsman sent

	when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Section 2.6 states <i>"If the service is unable to provide you with a response within 10 working days of the complaint being acknowledged, they will update you on the progress and inform you that they are extending the timescale by an additional 10 working days, and the reason(s) for this extension. We will only extend a complaint if there is good reason to do so."</i>	on 08/08/2025, our policy on extensions has been revised to ensure clarity
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	<a href="#">Complaint Policy</a>  Section 2.6 states <i>"If your complaint response falls outside of the extended timescales, you are entitled to approach the Housing Ombudsman."</i>	
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	<a href="#">Complaint Policy</a>	<p>Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on outstanding actions has been revised to ensure clarity.</p> <p>To show our commitment to this provision, the council are developing a new</p>



			Section 2.6 & 2.7 <i>“All complaint responses will be provided when the answer to the complaint is known and not when all outstanding actions are completed. We will ensure that updates are provided until all outstanding actions are completed”</i>	process within our complaints system to track, monitor, report, implement automatic reminders and communication/updates to the residents on outstanding actions. This will be in place by 28 November 2025
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	<p>The required housing complaint templates include:</p> <ul style="list-style-type: none"> <li>– Complaint definition</li> <li>– Complaint outcome</li> <li>– Complaint outcome rationale</li> <li>– Recommendations</li> <li>– Outstanding actions</li> </ul>	Policy & law references are encouraged as part of complaint training and guidance
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	<p><a href="#">Complaint Policy</a></p> <p>Section 2.6 states <i>“Where customers raise additional complaints during the investigation, these will 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</i></p>	

			<i>the response, the new issues will be logged as a new complaint.”</i>	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<a href="#">Complaint Policy</a>  Section 2.6  Complaint response templates capture this information  Response form on complaints system captures: <ul style="list-style-type: none"> <li>– Complaint stage</li> <li>– Decision on complaint</li> <li>– Outstanding actions (as of 28/11/2025)</li> </ul>	

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">Complaint Policy</a>  Section 1.4 states <i>“Our Council must accept a complaint or escalation unless there is a valid reason not to do so. If we decide not to accept a complaint or</i>	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on stage 2 escalations has been reviewed and amended to ensure clarity.

			<p><i>escalation, we will provide evidence and reasoning. Each complaint and/or escalation will be considered on its own merits. A complaint or escalation may not be considered under the following circumstances:</i></p> <ul style="list-style-type: none"> <li><i>- The issue giving rise to the complaint occurred over twelve months ago</i></li> <li><i>- 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</i></li> <li><i>- Matters that have previously been considered under the complaints process</i></li> <li><i>- If you exceed the escalation timescales defined in the relevant service area complaint procedure (refer to section 1.6 for specific service areas). All escalations are reviewed on a case-by-case basis and may still be considered if beyond the defined timescales”</i></li> </ul>	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 2.7</p>	

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	<a href="#">Complaint Policy</a>  Section 2.7 states <i>“If you wish to escalate your complaint, you are not required to provide reasons for escalating, however, it may be beneficial to the investigation for you to provide additional information if you feel it’s necessary.”</i>	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on escalations has been revised to ensure clarity.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Complaint Policy</a>  Section 2.7 states <i>“the senior manager for the service (or delegated Head of Service) will review the complaint; escalation reasons given and provide a response within 20 working days of the complaint being acknowledged. The person considering the complaint at stage 2 will not be the same person that considered the complaint at stage 1.”</i>	The complaints team have assignment lists for all managers required to respond to stage 1 complaints and subsequent senior managers to respond is escalated. Each are separated out my service area/department to avoid error
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaint Policy</a>  Section 2.7	

6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<a href="#">Complaint Policy</a>  Section 2.7 states <i>"If the Service Manager is unable to provide you with a response within 20 working days of the complaint being acknowledged, they will update you on the progress and inform you that they are extending the timescale by an additional 20 working days, and the reason(s) for this extension. We will only extend a complaint if there is good reason to do so."</i>	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on extensions has been revised to ensure clarity
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	<a href="#">Complaint Policy</a>  Section 2.7 states <i>"If your complaint response falls outside of the extended timescales, you are entitled to approach the Housing Ombudsman."</i>	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<a href="#">Complaint Policy</a>  Section 2.6 & 2.7 <i>"All complaint responses will be provided when the answer to the complaint is known and not when all outstanding actions are completed. We will ensure that updates are provided until all</i>	Following a review from the Housing Ombudsman sent on 08/08/2025, our policy on outstanding actions has been revised to ensure clarity.  To show our commitment to this provision, the council

			<i>outstanding actions are completed”</i>	are developing a new process within our complaints system to track, monitor, report, implement automatic reminders and communication/updates to the residents on outstanding actions. This will be in place by 28 November 2025
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	<p>The required housing complaint templates include:</p> <ul style="list-style-type: none"> <li>– Complaint definition</li> <li>– Complaint outcome</li> <li>– Complaint outcome rationale</li> <li>– Recommendations</li> </ul> <p>Outstanding actions</p>	Policy & law references are encouraged as part of complaint training and guidance
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman</li> </ul>	Yes	<p><a href="#">Complaint Policy</a></p> <p>Section 2.7</p> <p>Complaint response templates capture this information</p> <p>Response form on complaints system captures:</p> <ul style="list-style-type: none"> <li>– Complaint stage</li> <li>– Decision on complaint</li> </ul> <p>Outstanding actions (as of 28/11/2025)</p>	

	Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="#">Complaint Policy</a>  Section 2.7  Stage 2 response template also includes: <i>"Following the delivery of this response to you, our Complaints team will now close your Stage 2 complaint. As this is the final step in our process, if you are dissatisfied with the outcome of your complaint, you may refer your complaint to the Housing Ombudsman Service. The Housing Ombudsman is an independent body that investigates complaints against local councils."</i>	

## 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 intends to take, to put things right. These can include: <ul style="list-style-type: none"> <li>Apologising;</li> </ul>	Yes	Complaint response templates capture this information	We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.

	<ul style="list-style-type: none"> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <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>			The estimated delivery date for this workflow is by 31/10/2025
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<a href="#">Housing Compensation Policy</a>	<p>We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.</p> <p>The estimated delivery date for this workflow is by 31/10/2025</p>
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	Complaint response templates capture this information	To show our commitment to this provision, the council are developing a new process within our complaints system to track, monitor, report, implement automatic reminders and



				communication/updates to the residents on outstanding actions -This will include any remedies. This will be in place by 28 November 2025
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<a href="#">Housing Compensation Policy</a>	

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol>	Yes	<ul style="list-style-type: none"> <li>- Self-assessment completed</li> <li>- Quantitative and qualitative data included</li> <li>- incidents of non-compliance included in report as noted by Ombudsman</li> <li>- service improvements/recommendations completed</li> </ul>	

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	<a href="#">Document downloads - Publication scheme   Swindon Borough Council</a>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		
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		

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Quarterly and Annual reports published include any service improvements	<p>We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.</p> <p>All data will be published in reports in from Q1 2026</p> <p>The estimated delivery date for this workflow is by 31/10/2025</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Quarterly and Annual reports published include any service improvements	<p>We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.</p> <p>All data will be published in reports in from Q1 2026</p>

				The estimated delivery date for this workflow is by 31/10/2025
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<p>Quarterly and Annual reports published include any service improvements.</p> <p>The information is also shared via our <a href="#">Tenant Newsletter</a> "Tenant Focus - for council housing tenants"</p>	<p>We are developing a 'Lessons learned' internal case type within our complaints system to further our commitment to learning from complaints.</p> <p>The estimated delivery date for this workflow is by 31/10/2025.</p> <p>All data will be published in reports in from Q1 2026.</p> <p>Following the Q1 2026 report, stakeholder meetings on actions from the learnings gathered will be held each quarter</p>
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	<ul style="list-style-type: none"> <li>- Complaints Resolution Manager</li> <li>- Head of Housing Commissioning and Strategy</li> <li>- Head of Customer Strategy and Operations</li> </ul>	

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	Councillor Emma Bushell – Deputy Leader of the Council  Councillor Janine Howarth – Cabinet Member for Housing	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Councillor Janine Howarth	
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	Yes	Quarterly and Annual Housing complaint reports are produced and cover all points. These are shared with:  1. Director of Housing 2. Cabinet member for Housing 3. Head of Housing	

	d. annual complaints performance and service improvement report.			
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 co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes		