

## Appendix A: Self-assessment form – London Borough of Newham

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	Complaints Policy, section 2.1	This definition is set out in the 2024 Complaints Policy.
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	Complaints Policy, section 2.1	The right of a resident to complaint via a third party or representative is included in 2024 Complaints Policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Partial	Our recognition of the difference is set out in the policy.  The monitoring and recording of service requests forms part of the transformation project. Some teams have already started using this, via a module on Northgate.	This provision was recorded as only partially compliant in the Council's 2023/4, and remains only partially compliant.  In the 2023/4 self-assessment the Council stated that not all service

				<p>areas were recording and monitoring service requests. We also noted that the iCasework system is being replaced.</p> <p>The new casework system, Microsoft Dynamics 365 has been introduced and iCasework is currently being phased out.</p> <p>The new system captures service requests or enquiries that don't meet the criteria for a complaint where these are made via the central complaints service.</p> <p>Across other teams, NEC is being used to record service requests.</p> <p>There are still a small minority of teams where no case management system is being used, meaning that not all service requests are being recorded, monitored and reviewed in a systematic way yet. The requirement for a case-</p>
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				management system forms part of the Housing Services Improvement Programme which is expected to be in place by summer 2026, and training is starting for an interim solution (use of NEC) in autumn 2025.
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	Complaints Policy, section 2.1	The Council's commitment to this approach is included in 2024 Complaints Policy.
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	Complaints Policy, section 2.2	Included in 2024 Complaints Policy.  A new governance process for sign-off of resident-facing communications including surveys has been introduced. This will require the Head of Resident Engagement (Housing) and Programme Manager to confirm that all surveys include details of how residents can complain.

## 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	Complaints Policy, section 3.1	We respond to complaints that we do not choose to accept in writing, which includes explanation for why it doesn't meet the criteria
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Complaints Policy, section 3.2	Exclusions are included in 2024 Complaints Policy and the list included aligns with the Complaint Handling Code.

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy, section 3.2	<p>The requirement to accept complaints referred within 12 months of the issue occurring (or the resident becoming aware of the issue) is included in the Complaints Policy. Following recommendations from the Housing Ombudsman, Newham has updated the Complaints Policy to make clear that we will apply discretion to accept complaints made outside of the 12-month time limit.</p> <p>Where an officer believes that discretion should be applied, they are required to consult with the Complaints Manager. If there is still uncertainty, the issue is escalated to the Head of Resident Engagement (Housing) who may choose to involve senior leadership in the final decision if appropriate.</p>
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the	Yes	Complaints Policy, section 3.1	We respond to all complaints that we do not choose to accept in writing,

	<p>reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>			<p>which includes explanation for why it doesn't meet the criteria. This includes making the resident aware that they have the right to take that decision to the Ombudsman, which is included in the email template.</p> <p>Where the Ombudsman disagrees with our decision to not accept a complaint and tells us to take it on that we will do so.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	Complaints Policy, section 3.1	<p>The requirement for case-by-case consideration is included in 2024 Complaints Policy. In practice this means that officers escalate any cases where the individual circumstances mean that they are unsure how to treat the complaint to a manager who can decide whether to apply discretion.</p>

### 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	Complaints Policy, section 2.3 and 11 Council Complaints webpages	<p>The Council provides a range of ways through which to access the complaints process including:</p> <ul style="list-style-type: none"> <li>• Online via a webform</li> <li>• By telephone</li> <li>• Face-to-face at the housing hubs</li> </ul> <p>Following recommendations from the Housing Ombudsman, Newham has updated the Complaints Policy to make clear the full variety of channels through which a complaint can be made.</p> <p>There is also officer within the Housing Complaints Team whose role includes visiting residents where they are unable to make a</p>

				<p>complaint through other channels.</p> <p>The Council has initiated a programme of work to improve the demographic data we hold about our tenants and their household members in terms of diverse needs, which is due to complete in 2026. This, combined with the use of flags to identify people in need of reasonable adjustments, will improve our ability to anticipate residents' needs when making complaints.</p>
3.2	<p>Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>	Yes	Complaints Policy, section 2.3	<p>Managers and heads of service have been sent the Complaints Policy and Complaints Handling Code to cascade down to their wider teams.</p> <p>In order to raise staff awareness, the Complaints Manager has also presented at the department-wide All Housing Team Meeting (most recently in May 2025).</p>

				<p>Complaints is also a standing agenda item at meetings for senior staff and heads of services, including the Housing Senior Management Team meeting and Cabinet Accountability Portfolio Meeting (CAPM). This means that expectations of staff and escalation processes can be reinforced regularly.</p> <p>Guidance for members will be produced by March 2026 and form part of the member development programme.</p>
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>	Yes	Complaints Policy, section 9.2	<p>The Council's commitment to this approach is included in the Complaints Policy.</p> <p>In 2024/5 the Council's Annual Housing Complaints Performance Report has found that the stage 1 complaint volume remains high. This high volume is likely to reflect an accessibility process.</p>

3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaints Policy, section 11	The Complaints Policy is available online on the Council's website and a hard copy can also be viewed at both of the Council's Housing Hubs. The policy details the two-stage process, details of each stage and the timeframes for responding.
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 Policy, sections 6.3 and 11	Details of where the policy is publicised, including hard copies, is detailed in section 11. Information about the Ombudsman and the Complaint Handling Code are included in the Complaints Policy in section 6.3.
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	Complaints Policy, Section 2.1	The right of residents to have a representative deal with their complaint on their behalf is included in the Complaints Policy in section 2.1
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy, section 6.1 Stage 2 response templates	Information about residents; right to access the Ombudsman service is included in the policy under section 6.1, in all complaints emails as part of the

				template, and via a link on the Council's complaints webpage
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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	N/A	The Head of Resident Engagement (Housing) is responsible for the Housing Complaints Team, which is the dedicated team responsible for complaint handling, liaison with the Ombudsman and reporting to the Council's Cabinet.

<p>4.2</p>	<p>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.</p>	<p>Yes</p>	<pre> graph TD     A[Head of Resident Engagement - Housing] --&gt; B[Housing Project Officer (Complaints &amp; Housing Ombudsman) - PO6]     B --&gt; C[Housing Services Housing Project Officer (Complaints) - PO3]     B --&gt; D[Housing Option and Supply Housing Project Officer (Complaints) - PO3]     C --&gt; E1[Assistant Housing Project Officer - PO1]     C --&gt; E2[Assistant Housing Project Officer - PO1]     C --&gt; E3[Assistant Housing Project Officer - PO1]     D --&gt; F1[Assistant Housing Project Officer - PO1]     D --&gt; F2[Assistant Housing Project Officer - PO1]     D --&gt; F3[Assistant Housing Project Officer - PO1] </pre>	<p>An organogram of the Housing Complaints Team has been included, which illustrates the different levels at which staff work to resolve complaints. Junior officers are usually expected to handle cases independently, however are required to escalate to managers where there is uncertainty, or where they are handling stage 2 complaint (to ensure responses are quality-checked).</p>
<p>4.3</p>	<p>Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service</p>	<p>Yes</p>	<p>Complaints Policy, Section 9.1</p>	<p>The Council's approach to learning from complaints is set out in section 9.1 of the policy.</p> <p>In order to ensure that services are</p>

	and must be resourced to handle complaints effectively			effectively learning from complaints, the Complaints Manager has monthly meetings with the services that receive the most complaints to discuss common themes. These currently take place with the repairs and housing management teams.
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### 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	Complaints Policy, Section 2.3	We have a single policy which includes a commitment not to treat residents differently as a result of making a complaint, asset out in the policy.
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	Yes	Complaints Policy, Section 4	The policy has no extra named stages.  Following recommendations from the Housing Ombudsman, Newham has

	complaint') as this causes unnecessary confusion.			updated the Complaints Policy to remove any indication of extra stages.
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	Complaints Policy, Section 4	The policy has only two named stages  Following recommendations from the Housing Ombudsman, Newham has updated the Complaints Policy to remove any indication of extra stages.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes`	Complaints Policy, Section 4	The policy has only two named stages and residents are not expected to go through another complaints process for third parties.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint-handling forms part of the contracts between the PFIs and TMO	Newham Council's PFI schemes and TMO are required to follow Council policy, including compliance with the Complaints Policy. This is monitored through the management of their contracts, which require monthly reporting.

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	Template responses for Stage 1 and Stage 2	<p>Officers are required to set out their understanding of Stage 1 and Stage 2 complaints. Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to include that in acknowledging a stage 1 or stage 2 complaint we will set out our understanding of the complaint and the outcomes the resident is seeking. The policy has also been updated to make clear that if any aspect of the complaint is unclear, we will ask the resident for clarification.</p> <p>This approach is embedded within the template used, and in the case of stage 2 responses, is subject to checks by managers.</p>
5.7	When a complaint is acknowledged at either stage, landlords must be clear	Yes	Complaints Policy, Section 3.2	Following recommendations from the Housing

	<p>which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.</p>			<p>Ombudsman, Newham has updated the Housing Complaints Policy to include that in acknowledging a stage 1 complaint we will set which aspects we are and are not responsible for.</p> <p>The list of issues for which the Council is not responsible is listed in section 3.2. Officers are required to refer to this list in their responses to residents.</p>
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	Complaints Policy, Section 4	<p>This approach and expectation of complaint handlers is set out in the draft policy. Team leaders are also expected to attend external training where appropriate (delivered by HQN) to ensure they are aware of good practice.</p>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	Complaints Policy, Section 4	<p>This requirement is included in Section 4 of the Complaints Policy. Where the response falls outside the timescales for stage 1, the officer will email the</p>

				<p>resident and will give them the new date.</p> <p>In the case of stage 2 responses, officers email the resident with the new date and follow up with a phone call in addition to the email to ensure that the resident is aware.</p> <p>Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to make clear that in stage 1 and stage 2 cases where timescales have been extended the Council will agree with the resident suitable intervals for the Council to provide updates on their complaints.</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	No	Complaints Policy, Section 2.3	The Council makes reasonable adjustments for residents such as identifying an officer within the Housing Complaints Team whose role includes visiting residents where unable to

	reasonable adjustments must be kept under active review.			<p>make a complaint through normal channels.</p> <p>However at present records are not kept of disabilities disclosed, and these are not kept under active review. A programme of work is underway as part of the Council's Housing Services Improvement Programme to improve the accuracy of the data we hold on our residents and this will allow us to record disabilities and reasonable adjustments, as well as making them visible to complaints officers.</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	Complaints Policy, Section 4.2	<p>The reasons for which a complaint will not be escalated through all stages is set out in section 4.2 of the Complaints Policy. These reasons comply with the provisions set out in section 2 of the Complaint Handling Code.</p> <p>If an officer is unclear whether escalation should be refused, they are required to consult their manager.</p>

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	Currently held in iCasework	<p>The full record for all complaints is now stored on either the Microsoft Dynamics 365 case management system, or in the olde iCasework system that is currently being phased out.</p> <p>Both systems store the original complaint and the date received, all correspondence with the resident, plus supporting documentation.</p> <p>The new Microsoft Dynamics 365 also stores correspondence with other parties such as across teams within housing.</p>
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	Complaints Policy, Section 2.1	Included in Complaints Policy
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	<a href="#">Unreasonable and Persistent Complaints Policy 2024</a>	This provision was recorded as not compliant in the Council's 2023/4, but the Council is now compliant.

	<p>must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.</p>			<p>A policy and procedure has for managing unacceptable behaviour from residents and representatives is in place and was agreed at Cabinet in 2024.</p> <p>When a restriction is put in place, a plan is put in place for either restricting or managing the resident's behaviour, which is reviewed every three 3 months as standard, although this may be less frequent if justified by the case.</p> <p>Cases where restrictions are in place are kept under a single case record. If they have been assigned a single point of contact this will be logged, as will any restrictions around types of contact (for example restrictions over phone contact due to aggressive phone calls).</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	<a href="#">Unreasonable and Persistent Complaints Policy 2024</a>	This provision was recorded as not compliant in the

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.			<p>Council's 2023/4, but the Council is now compliant.</p> <p>The policy demonstrates regard for Equality Act 2010. As noted above and restriction is kept under review, and the restrictions that are put in place are considered on a case-by-case basis to ensure that the resident is not being disadvantaged on the basis of any protected characteristic. This would include making sure that contact that is permitted under restrictions is accessible to the resident.</p>
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## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and	Yes	Complaints Policy, section 4.1	The Council has a robust triage process that depends on the route through which the complaint is received.

	<p>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.</p>			<p>Complaints submitted online come through to the Housing Services Complaints Inbox where a dedicated officer is assigned to triaging new complaints.</p> <p>Complaints submitted via email usually come to the corporate complaints team in the first instance, who triage cases before sending through to Housing Services Complaints Inbox for secondary triage.</p> <p>When complaints are made by phone, residents are first asked whether they can submit their complaint in writing. Where the resident prefers not to, the corporate complaints team handles their phone complaint, then it is passed over to the Housing Services Complaints Inbox for triage.</p>
6.2	<p>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></p>	Yes	Complaints Policy, section 4.1	<p>This timescale is set out in the Complaints Policy, and the team's performance is assessed on the basis of adherence to this timescale.</p>

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	Complaints Policy, section 4.1, Annual Housing Complaints Performance Report	<p>This timescale is included in the Complaints Policy and forms the basis for performance measures.</p> <p>In 2024/5 the Council's Annual Housing Complaints Performance Report has found that 69% of stage 1 cases are responded to on time, which indicates that further work is needed to ensure compliance with our policy across all cases.</p>
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy, section 4.1	<p>This requirement is included in Section 4 of the Complaints Policy. Where the response is going to fall outside the timescales for stage 1, the officer will email the resident to give them the new date and the reasons for extending the deadline.</p> <p>Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to make clear the resident will be provided with an expected timescale for response.</p>

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	Complaints Policy, section 4.1 Stage 1 response template	Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to include the Ombudsman's current address.
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	Complaints Policy, section 4.1	The Council's Corporate Complaints team retains a live list of outstanding corrective actions, which is shared with the Housing Complaints Team. Officers in the Housing Complaints Team are responsible for monitoring these actions, sending reminders to service areas, and getting confirmation that they are complete.
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	Complaints Policy, section 4.1	This expectation is included in Complaints Policy and response template.
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	Yes	Complaints Policy, section 4.1	Included in Complaints Policy

	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.			
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	Complaints Policy, section 4.1 Stage 1 response template	This expectation is included in Complaints Policy and response template.

### 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	Complaints Policy, section 4.2 Stage 2 response template	The Complaints Policy is clear that stage 2 is the final stage of the Council's response.

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	Complaints Policy, section 4.2	This timescale is set out in the Complaints Policy, and the team's performance is assessed on the basis of adherence to this timescale.
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	Complaints Policy, section 4.2	This timescale is included in the Complaints Policy and forms the basis for performance measures.  2024/5 tenant satisfaction measures (TSM) stats indicate that 68% of stage 1 cases are responded to on time.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy, section 4.2 Stage 1 and Stage 2 response templates	This is set out in the Complaints Policy and forms part of the template response to both Stage 1 and Stage 2.
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	Complaints Policy, section 4.2, Annual Housing Complaints Performance Report	Included in Complaints Policy  In 2024/5 the Council's Annual Housing Complaints Performance Report has found that 31% of stage 2 cases are responded to on time, which indicates that further work is needed to ensure compliance with our policy across all cases.

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	Included in Complaints Policy	<p>Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to make clear stage 2 extensions will not be longer than 20 working days without good reason, and that the resident will be provided with an expected timescale for response.</p> <p>When an extension is required at stage 2, officers email the resident with the new date and follow up with a phone call in addition to the email to ensure that the resident is aware.</p>
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	Complaints Policy, section 4.2	<p>Included in Complaints Policy and included in the stage 2 response template</p> <p>Following recommendations from the Housing Ombudsman, Newham has updated the Housing Complaints Policy to include the Ombudsman's current address.</p>

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	Complaints Policy, section 4.2	<p>This provision was recorded as only partially compliant in the Council's 2023/4, but the Council is now compliant as a result of implementing a new process for monitoring corrective actions.</p> <p>The Council's Corporate Complaints team retains a live list of outstanding corrective actions, which is shared with the Housing Complaints Team. Officers in the Housing Complaints Team are responsible for monitoring these actions, sending reminders to service areas, and getting confirmation that they are complete.</p>
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	Complaints Policy, section 4.2	In order to ensure that all points raised are addressed, all Stage 2 responses are subject to review by a manager prior to being issued as part of a robust quality control process.

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"> <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 Service if the individual remains dissatisfied.</li> </ul>	Yes	Complaints Policy, section 4.2 Stage 2 response template	This expectation is included in Complaints Policy and response template. The review by the manager must also confirm that response includes all required content.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy, section 4.2	As noted above, all Stage 2 responses involve a manager review in addition to the complaints officer and any other officers involved

### 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:	Yes	Complaints Policy, section 5	A list of actions that residents can expect the Council to take when there has been wrongdoing is

	<ul style="list-style-type: none"> <li>• Apologising;</li> <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>			included in the Complaints Policy.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy, section 5	<p>The remedy being offered is agreed on a case by case basis, informed by the Housing Ombudsman's Guidance on Remedies.</p> <p>The Council also has internal guidance on the use of compensation which is currently being reviewed.</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	Complaints Policy, section 5	The Complaints Officer is responsible for detailing the remedy to the resident, ensuring that compensation is paid by the service area, and also checks apology letters. All remedial actions

				are overseen by the Complaints Manager. The Housing Complaints Manager has a weekly meeting with the Corporate Complaints team to check corrective actions are being followed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Forthcoming internal guidance on use of compensation (see 7.2 above)	<p>The remedy being offered is agreed on a case by case basis, informed by the Housing Ombudsman's Guidance on Remedies.</p> <p>The Council also has internal guidance on the use of compensation which is currently being reviewed to ensure compliance with the Housing Ombudsman's Guidance.</p>

## 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> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Complaints Policy, section 10	<p>Complaints performance is monitored through our corporate delivery plan that reports regularly to Cabinet.</p> <p>In 2025 the Council will publish its annual housing complaints performance report separately from the corporate complaints performance report. It is presented to the Council's Audit Committee and Cabinet. This will include an annual self-assessment of the Housing Complaints Policy</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<a href="#">Newham website</a>	The annual complaints performance report is published on the Council's website. In 2024, the agreement of the performance report at Cabinet was considered to be evidence of Cabinet's response, but in 2025 a formal letter detailing Cabinet's response will be published alongside the performance report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	We will if required
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We will if required
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	N/A	We will if required, and have integrated this requirement to tell key stakeholders including Ombudsman into our business continuity arrangements

## 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	Complaints Policy	<p>Complaints are a vital source of information for learning and improvement. For example, complaints are forming a key source for the development of the evidence base for the forthcoming Diverse Needs Strategy, a piece of work previously referred to in this report which will improve the way the Council recognises, records and responds to residents' diverse needs.</p> <p>In the shorter term, the Complaints Manager also has monthly meetings with the two services with the highest number of complaints (repairs and housing management) to discuss common themes and identify learning opportunities.</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	As above	As the Council continues to deliver its Housing Services Improvement Programme, we will continue to make use of complaints to identify issues across services and inform improvements.
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	Resident involvement strategy, complaints review panel, repairs panel (up and running), opportunity to share repairs complaints  Feedback on repairs complaints	We are currently in the process of developing our new Resident Involvement Strategy which will create new opportunities for resident scrutiny. We will seek to engage any future resident scrutiny function in monitoring the Council's performance on complaints.
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	Programme of complaints review, resident experience programme	The Senior Reporting Officer is the Assistant Chief Executive and Chief Transformation Officer, supported by the Assistant Director of Resident Experience, Operations & Resolution.
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	Yes	N/A	Cabinet Member for Resident Engagement and Resident Experience has overall responsibility for Complaints, with Cabinet Member Member for Housing Management and

	Responsible for Complaints ('the MRC').			Modernisation; Housing Needs, Homelessness and Private Rented Sector responsible for housing complaints.
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	Complaints Policy, section 10	The MRC is kept up to date via Cabinet Accountability Portfolio Meetings, which are monthly update meetings on performance.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	Complaints Policy, section 10	The MRC receives the following through the regular Cabinet Accountability Portfolio Meeting, as well as via the KPIs set out in the Corporate Delivery Plan, which is reported quarterly to Cabinet: <ul style="list-style-type: none"> <li>• updates on volume, categories and outcomes of complaints</li> <li>• complaint handling performance;</li> <li>• reviews of issues and trends arising from complaint handling;</li> <li>• regular updates on the outcomes of the Ombudsman's</li> </ul>

				<p>investigations and progress made in complying with orders related to severe maladministration findings</p> <p>The MRC receives updates on the annual complaints performance and service improvement report at Cabinet.</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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	N/A	<p>The Housing Complaints Team and Newham's Corporate Complaints Team meet weekly to ensure that employees' approach is aligned across the organisation.</p>