

## **Guildford Borough Council – Housing Ombudsman self-assessment form**

*April 2024*



As a member of the Housing Ombudsman scheme, we are committed to ensure we are compliant with the Housing Ombudsman's [Complaint Handling Code](#).

Each year, we must undertake a self-assessment against this code to ensure our complaints policy remains in line with its requirements. Below is the latest self-assessment, which will be reviewed throughout the year.

## Section 1: Definition of a complaint

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|---|------------------|--|---|
| 1.2            | <p>A complaint must be defined as:</p> <p><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></p>  | Yes              | <p>Section 3 of our complaints policy defines a complaint as:</p> <p>“A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the council, its own staff, or those acting on its behalf, affecting an individual or a group of individuals.”</p> | <p>We have broadened the language in the Housing Ombudsman’s definition from “landlord” to “council” and “residents” to “to individuals”.</p> <p>This is to reflect our role and function beyond being landlord but as a local authority – the terminology we use is in line with the Local Government and Social Care Ombudsman’s definition of a complaint which incorporates the Housing Ombudsman’s definition.</p> |
| 1.3            | <p>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.</p> | Yes              | <p>Section 8 of our complaints policy says:</p> <p>" Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint and does not have to use the word ‘complaint’ for it to be treated as such."</p>   | <p>As set out in our complaints policy.</p>   |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
|                |  |                  | Section 5 of our policy sets out that anyone can make a complaint, including third parties on behalf of an individual.   |  |
| 1.4            | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes              | Section 4 of our policy defines the matters that are not complaints, including:<br><br>“First time customers making a request for a service (such as removal of fly-tipping, missed waste collection, reporting noise nuisance, or reporting a housing repair).” | As set out in our complaints policy.   |
| 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              | Section 3 of our policy states that a complaint can be about:<br><br>“A failure to deliver a service which meets reasonable expectations”  | When such circumstances occur, we will continue to seek to provide a resolution to the service request, whilst processing their complaint in line with our 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   | Yes              |  | In all future consultations or resident engagement we undertake in our capacity as a landlord, we will look to include details of how residents can complain.      |

| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b> | <b>Commentary / explanation</b> |
|-----------------------|---|-------------------------|-----------------|---------------------------------|
|                       | complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide 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              | <p>Section 8 of our policy says:</p> <p>“Each complaint will be considered on its own merits”</p> <p>Section 4 of our policy sets circumstances where our complaints policy cannot be used. Furthermore, this section says:</p> <p>“If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.”</p> | As set out in our complaints policy.  |
| 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:       | Yes              | <p>Section 4 of our policy sets circumstances where our complaints policy cannot be used, including:</p> <ul style="list-style-type: none"> <li>• “Circumstances where the issue giving rise to the</li> </ul>  | There are further exclusions included within this section that relate to the council’s duties as a local authority, as opposed to its duties as a landlord. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                | <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> |                  | <p>complaint occurred over twelve months ago.</p> <ul style="list-style-type: none"> <li>Situations where 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>                                    |                                      |
| 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>Section 6 of our policy says:</p> <p>“We will accept complaints referred to us within twelve months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds (set out above). We will consider whether to apply discretion to accept complaints made outside this time limit on a case-by-case where there are good reasons to do so.”</p> | As set out in our complaints policy. |
| 2.4            | <p>If a landlord decides not to accept a complaint, an explanation must be</p>  | Yes              | <p>Section 4 of our policy sets circumstances where our</p>   | As set out in our complaints policy. |

| <b>Code provision</b> | <b>Code requirement</b>  | <b>Comply: Yes / No</b> | <b>Evidence</b>   | <b>Commentary / explanation</b>      |
|-----------------------|--|-------------------------|---|--------------------------------------|
|                       | 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. |                         | complaints policy cannot be used. Furthermore, this section says:<br><br>“If we decide not to accept a complaint, an explanation will be provided to you setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.” |                                      |
| 2.5                   | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes                     | Section 8 of our policy says that:<br><br>“Each complaint will be considered on its own merits and will consider the individual circumstances of each complaint”  | As set out in our complaints policy. |

### 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>Section 7 of our complaints policy says:</p> <p>“We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online.</p> <p>Complaints should preferably be received in writing and whilst we encourage use of our online form, we will accept any written communication. If a complaint is made via social media, we will signpost you to our complaints process to ensure it is properly logged, investigated, and responded to. In all cases, we will provide reasonable assistance to convert any form of contact, regardless of how it is initially made, into writing or other accepted mediums (such as an online form) where the</p> | As set out in our complaints policy. |



| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|---|------------------|---|--|
|                |   |                  | <p>complainant has a genuine need for support in doing this.</p> <p>When you are making a complaint, support with the process is available from our Customer Services team, who can assist with any issues.”</p> <p>Furthermore, section 15 of our policy says:</p> <p>“ We will comply with the Equality Act 2010, and where appropriate will make reasonable adjustments to our policy and procedure to accommodate an individual’s needs.”</p> |  |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord. | Yes              | <p>Section 7 of our policy says:</p> <p>“We acknowledge that we may receive a range of complaints in a variety of ways including by phone, in person, in writing, and online.”</p>  | We recognise the wide range of ways in which complaints can be made and will endeavour to ensure all staff are aware of how complaints need to be processed. |
| 3.3            | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low  | Yes              | Section 16 of our complaints policy says:   | As part of our annual reporting, we will review the number of complaints at all levels to assess the visibility  |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
|                | complaint volumes are potentially a sign that residents are unable to complain.  |                  | “We will produce an annual complaints performance and service improvement report for scrutiny and challenge”   | and accessibility of our complaints process.<br><br>We recognise the requirement of the Code. As such, when we review our complaint metrics for complaints, we ensure that there is no target or focus upon reducing the number of complaints we receive as that could lead to a negative outcome. |
| 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              | Section 1 of our policy says:<br><br>“We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who do not have access to the internet.” | Our complaints policy, and information about our complaints process is available via the council’s website:<br><br><a href="#">What complaints do we deal with? - Guildford Borough Council</a>  |
| 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              | Section 1 of our policy says:<br><br>“We will ensure that details of our complaint’s procedure remain published on our website and are available in printed form (on request) for customers who                                      | The equivalent information for the Local Government and Social Care Ombudsman is also included in the policy for complaints not about the council’s role as a landlord.  |

| Code provision | Code requirement | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|------------------|------------------|---|--------------------------|
|                |                  |                  | <p>do not have access to the internet.”</p> <p>Section 12 of our policy states that:</p> <p>“As a landlord, we will provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only at the point they have exhausted our complaint process.</p> <p>The outcome of a complaint will include the right to refer the complaint to the Housing Ombudsman.</p> <p>To contact the Housing Ombudsman please see their website: <a href="http://www.housing-ombudsman.org.uk">www.housing-ombudsman.org.uk</a> or call them on 0300 111 3000.</p> <p>Once we receive notification from the Housing Ombudsman Service that they are investigating a complaint we will</p> |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
|                |  |                  | assist with the request and provide the Ombudsman with the information they require.”  |   |
| 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              | Section 5 of our policy says:<br><br>“The affected person may choose for someone else to complain on their behalf such as a relative, carer or friend”   | As set out in our complaints policy.  |
| 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              | Section 12 of our policy states that:<br><br>“As a landlord, we will provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only at the point they have exhausted our complaint process.<br><br>The outcome of a complaint will include the right to refer the complaint to the Housing Ombudsman.<br><br>To contact the Housing Ombudsman please see their website: <a href="http://www.housing-ombudsman.org.uk">www.housing-</a> | The equivalent information for the Local Government and Social Care Ombudsman is also included in the policy for complaints not about the council’s role as a landlord. |

| Code provision | Code requirement | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|------------------|------------------|---|--------------------------|
|                |                  |                  | <p><a href="http://ombudsman.org.uk">ombudsman.org.uk</a> or call them on 0300 111 3000.</p> <p>Once we receive notification from the Housing Ombudsman Service that they are investigating a complaint we will assist with the request and provide the Ombudsman with the information they require.”</p> |                          |

## 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              | <a href="#">Executive Heads of Service for Community Wellbeing - Guildford Borough Council</a>  | The Assistant Director of Communications and Customer Services has overall responsibility for complaint handling. They are supported in this role by the Customer and Case Services team. There is a dedicated Complaints Resolution Officer in the Housing Department. Liaison with the Housing Ombudsman Service and the Local Government and Social Care Ombudsman is undertaken by the Strategy and Performance Team. |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes              | Section 1 of our policy says:<br>"This document sets out our approach to dealing with customer complaints and ensuring that complaints are investigated in an evidence-based, fair, and efficient way." | The above-mentioned people, who are collectively responsible for delivering the council's complaints function, do so using the council's complaints policy, which standardises and sets the council's complaints process. They have access to officers at   |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation              |
|----------------|---|------------------|---|---------------------------------------|
|                |   |                  |   | all levels to enable them to do this. |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively | Yes              | <p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.</p> <p>We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website”</p> <p>There is a dedicated Complaints Resolution Officer in the Housing Department who is experienced and trained to handle complaints effectively</p> | As set out in our complaints policy.  |

| <b>Code provision</b> | <b>Code requirement</b> | <b>Comply:<br/>Yes / No</b> | <b>Evidence</b>                            | <b>Commentary / explanation</b> |
|-----------------------|-------------------------|-----------------------------|--|---------------------------------|
|                       |                         |                             | and will identify learning from complaints |                                 |



## 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              | Our complaints policy  | We have a single complaints policy that covers complaints regarding the council's duties as a landlord (which are covered by the Housing Ombudsman Service's code) and our duties and responsibilities in other areas (which are covered by the Local Government and Social Care Ombudsman's code)    |
| 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              | <p>Section 4 of our policy says:</p> <p>"There are certain subject areas that we would not review under the complaints process because there are alternative methods of reporting these issues. These subject areas include the following:</p> <ul style="list-style-type: none"> <li>• First time customers making a request for a service (such as removal of fly-tipping, missed</li> </ul> | <p>There is no stage 0 within our complaints policy.</p> <p>As set out in section 4 of our policy, where an issue has not been previously brought to our attention as a request, it would be dealt with through the appropriate channels, after which it would be treated as a stage 1 complaint.</p> |

| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b>  | <b>Commentary / explanation</b>                                |
|-----------------------|---|-------------------------|--|--|
|                       |   |                         | waste collection, reporting noise nuisance, or reporting a housing repair)."   |  |
| 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                     | Section 8 of our policy sets out our process, which consists of two stages.  | As set out in our complaints policy.                           |
| 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                     |  | No aspect of our complaints policy is handled by a third party |
| 5.5                   | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Yes                     |  | No aspect of our complaints policy is handled by a third party |
| 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,        | Yes                     | Section 8 of our policy says:<br>"A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received." | As set out in our complaints policy.                           |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
|                | the resident must be asked for clarification.   |                  | “A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received.”  |   |
| 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              | Section 8 of our policy says:<br><br>“A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received.”<br>“A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received.”                            | Where we are not responsible for any aspect of a complaint, we will clearly clarify this in our acknowledgement. If we are able to, we will signpost any elements we are not responsible for to the correct organisation. |
| 5.8            | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open mind;<br>b. give the resident a fair chance to set out their position;<br>c. take measures to address any actual or perceived conflict of interest; and<br>d. consider all relevant information and evidence carefully. | Yes              | Section 8 of our policy says:<br><br>“At each stage of the complaints process, our complaint handlers will:<br><ul style="list-style-type: none"> <li>• Deal with complaints on their merits, act independently, and have an open mind.</li> <li>• Give the complainant a fair chance to set out their position.</li> </ul> | As set out in our complaints policy.  |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|--|------------------|--|--------------------------------------|
|                |  |                  | <ul style="list-style-type: none"> <li>• Take measures to address any actual or perceived conflict of interest.</li> <li>• Consider all relevant information and evidence carefully.”</li> </ul>   |                                      |
| 5.9            | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes              | <p>Section 8 of our policy says:</p> <p>For Stage 1 complaints: “If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”</p> <p>For Stage 2 complaints: “The response to a Stage 2 complaint</p> | As set out in our complaints policy. |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|--|------------------|---|---|
|                |  |                  | will be sent within twenty working days of the complaint being acknowledged. If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” |   |
| 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              | Section 15 of our policy says:<br>" We will comply with the Equality Act 2010, and where appropriate will make reasonable adjustments to our policy and procedure to accommodate an individual’s needs.”  | Our complaints handling system allows us to record any reasonable adjustments and disclosed disabilities, ensuring this information is available to those investigating and processing the complaint. |
| 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  | Yes              | Section 8 of our policy says:<br>“If all or part of the complaint is not resolved to your satisfaction  | The content of section 2 of our policy aligns with section 2 of the Housing Ombudsman’s code. There   |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
|                | clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.  |                  | <p>at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal. Stage 2 is our final response, and the appeal will not be considered by the same person that considered the complaint at Stage 1.”</p> <p>Furthermore, section 4 of our policy sets out the circumstances where we would not consider a complaint though our complaints procedure.</p> | are further exclusions included within this section that relate to the council’s duties as a local authority, as opposed to its duties as a landlord. |
| 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              | <p>Section 13 of our policy says:</p> <p>“We will log all complaints and their outcomes at each stage in our complaints handling system.”</p>   | Our complaints handling system enables us to record all of the information required here.   |
| 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   | Yes              | <p>Section 10 of our policy says:</p> <p>“We will ensure that any remedy we offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of</p>   | As set out in our complaints policy.  |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|---|------------------|--|--|
|                | complaints process without the need for escalation.   |                  | detriment caused to the resident as a result.”   |  |
| 5.14           | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes              | <p>Section 19 of our policy says:</p> <p>“We are committed to dealing with all complaints received fairly and impartially, however, there will be circumstances where individuals hinder consideration of complaints and need to be managed differently. We have a separate policy for such matters, which can be found on our website.”</p> <p>Furthermore, our Vexatious, Malicious and Persistent Grievances Policy is available on the complaints pages of our website: <a href="#">What complaints do we deal with? - Guildford Borough Council</a></p> | As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances Policy. |
| 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              | <p>Our Vexatious, Malicious and Persistent Grievances Policy (<a href="#">available on our website</a>) says:</p> <p>“We will comply with the Equality Act 2010, and where required will adapt its policy and</p>  | As set out in our complaints policy and our Vexatious, Malicious and Persistent Grievances Policy. |

| Code provision | Code requirement | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|------------------|------------------|--|--------------------------|
|                |                  |                  | <p>procedure to accommodate an individual's needs.</p> <p>Any restrictions imposed on a customer's contact should recognise and be appropriate to their individual circumstances."</p> |                          |



## 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              | <p>Section 8 of our policy says:</p> <p>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation. In doing so, we will consider factors such as the complexity of the complaint and whether the complainant is vulnerable or at risk.”</p> <p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To resolve customer complaints at the earliest stage possible.”</p> | As set out in our complaints policy. |
| 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              | <p>Section 8 of our policy says:</p> <p>“A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received.”</p>  | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
| 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              | Section 8 of our policy says:<br>“The response to a Stage 1 complaint will be sent within ten working days from complaint being acknowledged.”  | As set out in our complaints policy. |
| 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              | Section 8 of our policy says:<br><br>“If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision, and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” | As set out in our complaints policy. |
| 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              | Section 8 of our policy says:<br><br>“If responding within ten working days is not possible, an explanation will be given for the delay in providing the decision,  | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|---|------------------|--|--------------------------------------|
|                |   |                  | and an expected date for when the Stage 1 outcome should be reached. This should not exceed a further ten working days without good reason and we will clearly explain the reason to you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.”   |                                      |
| 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              | Section 8 of our policy says:<br><br>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation.”<br><br>Section 10 of our policy says:<br><br>“When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion.” | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|---|------------------|--|---|
| 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              | Section 9 of our policy says: "Complaint responses will 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."   | As set out in our complaints policy.  |
| 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>Section 3 of our policy defines what a complaint is whilst section 4 defines what is not a complaint.</p> <p>Section 8 of our policy says that: "A Stage 1 complaint will be logged, defined, and acknowledged within five working days of the complaint being received."</p> | <p>We will use the acknowledgement of a complaint to ensure our understanding of definition of the complaint matches that of the resident. Should this acknowledgement raise any further related issues following this, we will update our definition of the complaint to ensure effective response.</p> <p>Should further issues be raised following the stage 1 response, we would process these as we would any other complaint using the definitions set out in sections 3 and 4 of our policy.</p> |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|--|------------------|--|--------------------------------------|
| 6.9            | <p>Landlords must confirm the following in writing to the resident at the completion of stage 1 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 stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes              | <p>Section 9 of our policy says:</p> <p>“In a complaint response, we will include the following in clear, plain language:</p> <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• <b>Stage 1:</b> details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response.”</li> </ul> | As set out in our complaints policy. |

Stage 2

| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b>   | <b>Commentary / explanation</b>   |
|-----------------------|---|-------------------------|---|---|
| 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                     | Section 8 of our policy says:<br><br>"If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal. Stage 2 is our final response"   | As set out in our complaints policy.  |
| 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                     | Section 8 of our policy says:<br><br>"A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received."   | As set out in our complaints policy.  |
| 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                     | Section 8 of our policy says:<br><br>"If all or part of the complaint is not resolved to your satisfaction at Stage 1, you can request for it to be progressed to Stage 2 to be considered as an appeal."<br><br>"A Stage 2 complaint will be logged, defined, and acknowledged within five working days of the appeal request being received." | Our complaints policy does not require the resident to explain their reasons for requesting a stage 2 appeal, and if we are not clear on the reasons why this request has been made, we will use the acknowledgement process to seek to clarify this. |
| 6.13                  | The person considering the complaint at stage 2 must not be the same  | Yes                     | Section 8 of our policy says:   | As set out in our complaints policy.  |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|---|------------------|--|--------------------------------------|
|                | person that considered the complaint at stage 1.  |                  | “Stage 2 is our final response, and the appeal will not be considered by the same person that considered the complaint at Stage 1.”  |                                      |
| 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              | Section 8 of our policy says:<br><br>“The response to a Stage 2 complaint will be sent within twenty working days of the complaint being acknowledged”   | As set out in our complaints policy. |
| 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              | Section 8 of our policy says:<br><br>“If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” | As set out in our complaints policy. |
| 6.16           | When an organisation informs a resident about an extension to these   | Yes              | Section 8 of our policy says:  | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
|                | timescales, they must be provided with the contact details of the Ombudsman.  |                  | “If this is not possible, an explanation and an expected date by when the Stage 2 outcome should be reached will be provided. This should not exceed a further twenty working days without good reason and we will clearly explain this reason to the you. When doing this, we will agree suitable intervals with you for keeping you informed about your complaint and will provide you with the contact details of the relevant Ombudsman.” |                                      |
| 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              | <p>Section 8 of our policy says:</p> <p>“With Stage 1 complaints, we will consider which complaints can be responded to as early as possible, and which require further investigation.”</p> <p>Section 10 of our policy says:</p> <p>“When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that</p>   | As set out in our complaints policy. |



| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|--|------------------|--|--------------------------------------|
|                |  |                  | any remedy proposed is followed through to completion.”  |                                      |
| 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              | Section 9 of our policy says: “Complaint responses will 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.”   | As set out in our complaints policy. |
| 6.19           | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes              | Section 9 of our policy says:<br><br>“In a complaint response, we will include the following in clear, plain language:<br><ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• <b>Stage 1:</b> details of how to escalate the matter to Stage 2 if the</li> </ul> | As set out in our complaints policy. |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|--|------------------|---|--|
|                |  |                  | <p>individual is not satisfied with the response.</p> <p><b>Stage 2:</b> details of how to escalate the matter to the relevant Ombudsman if the individual remains dissatisfied.”</p> |  |
| 6.20           | <p>Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.</p> | Yes              | <p>Section 8 of our policy says:<br/>“Stage 2 is our final response”</p>  | <p>As set out in our complaints policy.</p> <p>The people mentioned in 4.1 above, who are collectively responsible for delivering the council’s complaints function, have access to officers at all levels to enable them to do deliver the council’s complaints function.</p> |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|--|------------------|--|--------------------------------------|
| 7.1            | <p>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:</p> <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> | Yes              | <p>Section 10 of our policy says:</p> <p>“Remedies offered by us may include (but are not limited to) the following:</p> <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 a 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> | As set out in our complaints policy. |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | <p>Section 10 of our policy says:</p> <p>“We will ensure that any remedy we offer at Stage 1 or Stage 2 reflects the extent of the service failures, and the level of</p>  | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation             |
|----------------|---|------------------|--|--------------------------------------|
|                |   |                  | detriment caused to the resident as a result.”   |                                      |
| 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              | Section 10 of our policy says:<br><br>“When offering a remedy, we will set out what will happen and timelines for this, in agreement with the complainant where appropriate. We will ensure that any remedy proposed is followed through to completion.” | As set out in our complaints policy. |
| 7.4            | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes              | Section 10 of our policy says:<br><br>“We will also take account of guidance issued by the relevant Ombudsman when deciding on appropriate remedies.”  | As set out in our complaints policy. |

## Section 8: Putting things right

| 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              | <p>Section 16 of our policy says:</p> <p>“We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website.”</p> | <p>As set out in our complaints policy; the annual report to Corporate Governance and Standards Committee will include all the information required by the code.</p> |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation             |
|----------------|---|------------------|---|--------------------------------------|
| 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              | Section 16 of our policy says:<br><br>"This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this." | As set out in our complaints policy. |
| 8.3            | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes              | Section 16 of our policy says:<br><br>"We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to review and update the self-assessment following an investigation by the relevant Ombudsman."                                 | As set out in our complaints policy. |
| 8.4            | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes              | Section 16 of our policy says:<br><br>"We will also carry out a self-assessment following a significant restructure, merger and/or change in procedures, as well as if we are requested to  | As set out in our complaints policy. |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|---|------------------|---|--|
|                |   |                  | review and update the self-assessment following an investigation by the relevant Ombudsman.”  |  |
| 8.5            | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes              | Section 18 of our policy says:<br><br>“If we are unable to comply due to exceptional circumstances with this policy, or the Code of either Ombudsman, we will inform the relevant Ombudsman, provide information to residents who may be affected, and publish this on our website as soon as we can determine this within the scope of the issue.” | As set out in our complaints policy.<br><br>Should an exceptional circumstance, like a cyber incident, arise where we could not comply with the Code, as part of our wider response to the issue we would look to provide timescales to customers and residents on when are able to return to business as usual, including compliance with the Code. |

## 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              | <p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To ensure we learn from our mistakes to improve services where this is appropriate and to avoid repeat complaints”</p> <p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.”</p> | As set out in our complaints policy. |
| 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              | <p>Section 2 of our policy says that one of the objectives of the policy is:</p> <p>“To promote accountability and transparency and an effective complaint handling culture.”</p>   | As set out in our complaints policy. |



| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|---|------------------|---|--|
|                |   |                  | <p>Section 16 of our policy says:</p> <p>“We are aware that learning from complaints can influence future service changes, policies, and procedures. We will look for systemic themes in complaints received and if found will use this awareness to learn and improve our service delivery.”</p>   |  |
| 9.3            | <p>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.</p> | Yes              | <p>Section 16 of our policy says:</p> <p>“We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website.” We produce an annual housing complaints report which is shared with the management team and the Tenants Engagement Panel and published online.</p> | <p>As set out in our complaints policy.</p>                              |
| 9.4            | <p>Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person</p>  | Yes              | <p><a href="#">Executive Heads of Service for Community Wellbeing - Guildford Borough Council</a></p>   | <p>The Assistant Director of Communications and Customer Services is</p> |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|--|------------------|---|--|
|                | must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.   |                  |   | accountable for complaint handling.  |
| 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              | <a href="#">The Executive - Guildford Borough Council</a>   | The Lead Member for Engagement and Customer Services is council's Member Responsible for 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              | Section 16 of our policy says:<br><br>"We will produce an annual complaints performance and service improvement report for scrutiny and challenge. This report will be considered annually by the Corporate Governance and Standards Committee and will be published on the complaints pages of our website. The response of the Corporate Governance and Standards Committee to the report will also be published alongside this." | As set out in our complaints policy.   |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|--|------------------|---|---|
| 9.7            | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> | Yes              |   | <p>The Assistant Director of Communications and Customer Services will keep the Lead Member for Engagement and Customer Services regularly appraised of complaints as part of their regular briefings, updates and discussions.</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>   | Yes              | <p>Section of our policy says:</p> <p>“our objective is for complaints to be handled in a way that reflects the need to:</p> <ul style="list-style-type: none"> <li>• Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> </ul> | <p>As set out in our complaints policy.</p>   |

| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b>   | <b>Commentary / explanation</b> |
|-----------------------|---|-------------------------|---|---------------------------------|
|                       | c. act within the professional standards for engaging with complaints as set by any relevant professional body. |                         | <ul style="list-style-type: none"> <li>• Take collective responsibility for any shortfalls identified through complaints, rather than blaming others.</li> <li>• Act within the professional standards for engaging with complaints as set by any relevant professional body.”</li> </ul> |                                 |