

## Westminster City Council Self-Assessment against the Housing Ombudsman Code 2024

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply?	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	<a href="#">Corporate complaints policy   Westminster City Council</a>	Our definition of a complaint in our complaints policy and housing complaints procedures is consistent with this wording We refer to our policy throughout this self- assessment
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>This is evidenced in our complaints policy.</p> <p>When a resident expresses dissatisfaction that complies with the definition of a complaint to be recorded as a complaint we do so, regardless of how it is expressed.</p> <p>Our complaint handling training specifically advises our staff that residents do not need to use the word complaint, for it to be logged as such.</p> <p>Our complaints policy specifically explains that we will accept complaints raised by a third party. Our procedures confirm how we will raise such complaints and our approach to seeking consent where necessary.</p>

Code provision	Code requirement	Comply?	Evidence	Commentary / explanation
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>Our complaints policy sets out the difference between a service request and a complaint.</p> <p>We triage all complaints requests to determine if the request is either a complaint or service request. Once this has been established, we confirm this in writing and outline the next steps.</p> <p>We are able to report on service requests that have been made via the complaints process from our new customer relationship management (CRM) system.</p>
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>Our complaints procedures, and related training, reminds triaging staff that expressions of dissatisfaction with a service request should be considered a complaint, and investigators that any work to resolve issues should continue whilst the complaint is being investigated.</p>
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also	Yes		<p>When residents express dissatisfaction through a survey, we advise them that they can find information on how to complain about Westminster's services on our website or by calling our contact centre, should they wish to do so.</p>

Code provision	Code requirement	Comply?	Evidence	Commentary / explanation
	must provide details of how residents can complain.			

## Section 2: Exclusions

Code provision	Code requirement	Comply?	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	Our complaints policy details the circumstance where we do not accept complaints. We triage all complaint requests to ensure they qualify as a complaint in line with this policy. Our new CRM system allows us to monitor and report on these cases.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and</li> </ul>	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="#">Complaints   Westminster City Council</a>	This is clearly outlined on our website, within our complaints policy and also our correspondence with residents. Our complaints policy and housing complaints procedures include clear definitions of what can and cannot be considered as a complaint.

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>This is made clear in the complaints policy.</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>With all declined requests for either a new complaint, a complaint escalation or end of complaints process an explanation is provided along with the correct signposting.</p> <p>We have template responses to ensure that the information we provide is consistent, which includes signposting to the Housing Ombudsman Service.</p>

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	Each complaint is considered on its own merits and our policy sets out some areas where exceptions may be made.
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply?	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	<a href="#">Complaints   Westminster City Council</a> <a href="#">Equality duties   Westminster City Council</a> <a href="#">Contact us using a British Sign Language interpreter   Westminster City Council</a>	<p>We accept complaints via post, email, telephone, elected member, in person and online via our website.</p> <p>Complaints can also be made by advocates on behalf of residents (with the correct permissions). This is explained on our Council website, in our complaints policy and housing complaints procedures.</p> <p>We offer letters in other formats including translating into other languages, easy reads and large print versions which are available on request. We also have a corporate sign language interpreter scheme.</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	<a href="#">Complaints   Westminster City Council</a>	<p>Our complaints procedures, and related training, details what an officer should do if they receive a complaint directly from a resident to ensure that it is passed to the right person as quickly as possible.</p> <p>We have also refreshed our housing induction programme for new starters and this includes</p>

				ensuring all staff know what to do if a resident complains directly to them.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes		<p>The Council consulted on its housing compensation policy and in doing so raised awareness of the complaints process. There are corresponding trends with an increase in complaints received during the consultation period to reflect this. This consultation was widely promoted online, in Council newsletters, on estates, in housing offices and by text to residents.</p> <p>On 8 April 2024, the Council shared a “You Said, We Did” on the consultation feedback on the compensation policy. This also reminded residents of how to make a complaint.</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	<p><a href="#">Corporate complaints policy   Westminster City Council</a></p> <p><a href="#">Westminster City Council (campaign-archive.com)</a></p>	<p>This information is provided in our complaints policy is available in a range of formats including:</p> <ul style="list-style-type: none"> <li>• A full PDF version on the website</li> <li>• A summary embedded into our webpages which are compliant with accessibility requirements.</li> <li>• Periodic articles in the resident newsletter</li> </ul> <p>Translations into other languages, easy reads and large print versions are available on request.</p>
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	<p><a href="#">Corporate complaints policy   Westminster City Council</a></p>	<p>Our complaints policy includes details of the Housing Ombudsman Service and makes reference to managing housing complaints in line with the Complaint Handling Code.</p>

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	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="#">Complaints   Westminster City Council</a>	Our complaints policy makes it clear that representatives can make complaints on behalf of a resident.  The Council website also makes it clear that representatives can deal with a complaint or accompany residents to a meeting.
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	Information about how to contact the Housing Ombudsman Service is included in our complaints policy. This information is also routinely shared with residents as part of our acknowledgement of complaints, in holding responses when we have not been able to meet our target response times and when sending complaint responses.

#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply	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 dedicated complaints team is in place for Housing Services.  There is also a corporate complaints manager who ensures complaints performance across the council is reported to the relevant scrutiny panels.

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		<p>The Complaints Team has access to Officers, Managers and Senior Managers to assist with complaint resolution.</p> <p>The housing complaints team hold case conferences which are attended by officers at different levels in the department.</p>
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>We prioritise complaint handling and learning at all levels. Senior leaders receive weekly reports of performance and trends and we have agreed a new learning framework.</p> <p>All complaint handlers have attended complaint handling training and regular refresher sessions are scheduled focussing on specific elements of this.</p> <p>They have also completed empathy, customer care and safeguarding training as well as various related in-house eLearning modules. This is also discussed and supported within team meetings and 1-2-1 development via their line manager.</p> <p>The complaints team complete Housing Ombudsman Service 'dispute resolution' eLearning as part of induction.</p> <p>All complaint responses are reviewed by managers and directors to ensure responses seek to resolve complaints and are customer centric.</p>



## 5: The Complaint Handling Process

Code provision	Code requirement	Comply?	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	<a href="#">Corporate complaints policy   Westminster City Council</a>	The Council's complaints policy is adopted across all services, including housing.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="#">Complaints   Westminster City Council</a>	There is a clear 2 stage complaints process in place which includes this requirement. The practice is evidenced through communications with residents that are recorded on our complaints management system.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="#">Complaints   Westminster City Council</a>	The Council adopts a 2 stage process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	All complaints are led directly by the Council, none are handled by a third party.

	must not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		All complaints are led directly by the Council, none are 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, the resident must be asked for clarification.	Yes		All acknowledgement letter templates require the officer to include the complaint definition and desired outcomes.  Our procedure makes it clear how we should clarify any aspects of the complaint where these are unclear and indicate that at least two attempts to contact the resident should be made.
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		As part of the triaging of complaints, acknowledgement responses must confirm which aspects of the complaint will be considered.
5.8	At each stage of the complaints process, complaint handlers must:  a) deal with complaints on their merits, act independently, and have an open mind;	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	Our complaints policy sets out that these are the principles that complaint handlers will adhere to when investigating complaints.  This is also set out in our complaints procedures and covered in complaints training which is undertaken by all complaint handlers.

	<p>b) give the resident a fair chance to set out their position;</p> <p>c) take measures to address any actual or perceived conflict of interest; and</p> <p>d) consider all relevant information and evidence carefully.</p>			
5.9	<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	<p><a href="#">Corporate complaints policy   Westminster City Council</a></p>	<p>Our policy makes it clear that when an investigation will require more than the target response time to complete, we will keep residents informed.</p> <p>We recognise that residents are not consistently and proactively updated on delays in investigating their concerns. We are developing our case management system to ensure that there are automated reminders on the target response date to support complaints officers to provide updates in a timely fashion.</p>
5.10	<p>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.</p>	Yes	<p><a href="#">Corporate complaints policy   Westminster City Council</a></p> <p><a href="#">Complaints   Westminster City Council</a></p> <p><a href="#">Equality duties   Westminster City Council</a></p>	<p>Our online complaints form asks all residents to let us know about any reasonable adjustments so we can adjust our services accordingly.</p> <p>Our new CRM system allows responsible personnel to add alerts for residents who have health or support needs, which includes disabilities.</p> <p>We undertake household support reviews, contacting households where we already hold information about their support needs to review these needs and ensure that these remain up to date.</p>

				We are carrying out a tenant census to ensure we have up to date information on support needs including required reasonable adjustments.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	Our policy details how we manage requests for escalations.
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		All complaint records are held on a central case management system.
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	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="https://www.westminster.gov.uk/housing/claiming-compensation">https://www.westminster.gov.uk/housing/claiming-compensation</a>	We set out our approach to remedies and compensation in our complaints policy and our housing compensation policy, We encourage all staff to remedy complaint issues at any stage where service failures are apparent. Our complaints procedures and compensation and remedies procedure details the different remedies that we should consider when

				resolving a complaint and that these should all be considered at every point in the process, or before a complaint is made.
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	Our complaints policy sets out how we manage unreasonable behaviour and this is supported by a housing unreasonable behaviour and unreasonably persistent contact procedure.  A corporate policy on dealing with unreasonable behaviour towards staff will be developed over 2024/25, and housing procedures will be updated once this is agreed.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<a href="#">Equality duties   Westminster City Council</a>	We have a procedure for managing unreasonable behaviour and unreasonably persistent customers, this complies with the Council's approach to fulfilling our equality duties.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply?	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>We triage all complaints to ensure that they are considered by the most appropriate team and expect the majority to be addressed quickly and in line with the target response time of 10 working days. To help with this we ask residents when they make a complaint to let us know if they need us to make any adjustments.</p> <p>Where a complaint is about complex issues this is reviewed by senior officers as part of the triage process to identify the most appropriate person to lead the response.</p> <p>Our complaints procedure includes guidance on investigating complaints from vulnerable residents which is supported by complaints training for complaint handlers.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>This is set out in our complaints policy.</p> <p>We know that in 2023/24 our performance was well short of this.</p> <p>We have recently made a number of changes to our internal teams, supported by new procedures and training to ensure that that we meet these targets consistently.</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	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>Our complaints policy sets out that all complaints should be responded to within 10 working days at stage 1.</p> <p>We know that in 2023/24 our performance in relation to timeliness fell far below this. To</p>

				<p>address this, we have brought in more capacity to address the complaint volumes, as well as introducing new procedures to address complaints that we receive, we have also put in new processes to ensure ongoing oversight of all complaints with a particular focus on ensuring complaint responses are sent within our published timescales.</p> <p>We have developed a new CRM system to increase visibility of complaints to ensure that we have real time performance reporting of complaints that are due a response, including automated task reminders to help drive focus and responsiveness.</p> <p>Senior Management is updated regularly on the number of open complaints and ongoing oversight will ensure that all complaints are responded to promptly with each directorate taking ownership of complaints in their area.</p>
6.4	<p>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.</p>	Yes	<p><a href="#">Corporate complaints policy   Westminster City Council</a></p>	<p>Our complaints policy sets out our approach to extending the target response time on complaints.</p> <p>Our complaints procedures outline that various points within the investigation stage should trigger a review of whether more time would be needed to respond to a complaint.</p> <p>During routine Senior Management discussions on open complaints, complaints that are due a response within two days are discussed so that extensions are not applied unless necessary.</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		We have template letters for extending complaint timescales which include information about how to approach the Housing Ombudsman Service.
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		Our complaint procedures set out our approach to responding to complaints and emphasise that this should be when the response is known not when the issue is resolved.  Our templates include a section for adding outstanding actions and the system has been developed to enable us to record and track actions.  We are also developing reporting mechanisms to ensure there is Senior Leadership Team oversight of recorded commitments.
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		Our complaints procedures and complaint handling training addresses how to investigate a complaint in line with the Housing Ombudsman Service guide to dispute resolution.
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	Yes		Our complaints procedure provides guidance to complaint handlers on how to deal with new issues raised during the investigation, this is supported by complaint handling training.



	already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
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		This is all included in our response templates.

## Stage 2

Code provision	Code requirement	Comply?	Evidence	Commentary / explanation
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	All requests for a stage 2 escalation are reviewed by a senior complaints officer. Only complaints that cannot be considered within the remit of the complaints policy are not escalated.
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	<a href="#">Corporate complaints policy   Westminster City Council</a>	This is set out in our policy. We know that in 2023/24 we did not consistently achieve this, particularly from Autumn 2023 through to Spring 2024. We have recently made a number of changes to our internal teams, supported by new procedures and training to ensure that that we meet these targets consistently.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	This is set out in our complaints policy. Whilst not required our policy and stage 1 letter template explains to residents why it is helpful if they can provide this information as part of any escalation. Our procedures provide guidance to complaint staff on improving understanding of this as part of triage, acknowledgement and investigation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	Senior complaints officers work in partnership with the appropriate Head of Service to review stage 2 complaints. This ensures that there is impartiality in the investigation. The Senior Officer has no previous involvement in the stage 1 response. All responses are approved by a

				Senior Leader, as appointed by the Chief Executive Officer.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	<p>Our complaints policy sets out that all complaints should be responded to within 20 working days at stage 2.</p> <p>We know that in 2023/24 our performance in relation to timeliness fell far below this. To address this, we have brought in more capacity to address the complaint volumes, as well as introducing new procedures to address complaints that we receive, we have also put in new processes to ensure ongoing oversight of all complaints with a particular focus on ensuring complaint responses are sent within our published timescales.</p> <p>We have also developed a new CRM system to increase visibility of complaints to ensure that we have real time performance reporting of complaints that are due a response, including automated task reminders to help drive focus and responsiveness.</p> <p>Senior Management is updated regularly on the number of open complaints and ongoing oversight will ensure that all complaints are responded to promptly with each directorate taking ownership of complaints in their area.</p>
6.15	Landlords must decide whether an extension to this timescale is needed when considering the	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a>	We have template letters for extending complaint timescales which include

	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.			information about how to approach the Housing Ombudsman Service.  During routine Senior Management discussions on open complaints, complaints that are due a response within two days are discussed so that extensions are not applied unless necessary.
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		We have template letters for extending complaint timescales which include information about how to approach the Housing Ombudsman Service.
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		Our complaint procedures set out our approach to responding to complaints and emphasise that this should be when the response is known not when the issue is resolved.  Our templates include a section for adding outstanding actions.  We are also developing mechanisms to report outstanding actions to the Senior Leadership Team on a regular basis so that there is appropriate monitoring and oversight of our commitments to residents.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes		Our complaint procedures and complaint handling training addresses how to investigate a complaint in line with the Housing Ombudsman Service guide to dispute resolution.

	policy, law and good practice where appropriate.			
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) the complaint definition;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) details of any outstanding actions; and</li> </ul> <p>details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>	Yes		This is included in our letter templates.
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>Stage 2 responses are independently investigated by a Senior Complaints Officer who has had no previous involvement in the stage 1 response.</p> <p>Our procedures outline how they work with relevant colleagues to investigate and respond to the complaint.</p> <p>All responses are approved by a senior leader, as appointed by the Chief Executive Officer.</p>

## Section 7: Putting things right

Code provision	Code requirement	Comply?	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><a href="#">Corporate complaints policy   Westminster City Council</a></p> <p><a href="#">Claiming compensation   Westminster City Council</a></p>	<p>We set out our approach to remedies in our complaints policy and to paying compensation in our housing compensation policy.</p> <p>Our compensation and remedies procedure details the different remedies that we should consider when resolving a complaint and our complaints procedures.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p><a href="https://www.westminster.gov.uk/about-council/complaints">https://www.westminster.gov.uk/about-council/complaints</a></p> <p><a href="#">Claiming compensation  </a></p>	<p>When residents make a complaint we specifically ask residents to explain how a problem has impacted them, including on any health or support needs, so that remedies are reflective of individual impact.</p> <p>Our complaints procedure and compensation and remedies procedure,</p>

			<a href="#">Westminster City Council</a>	supported by complaints handling training, specifically sets out that remedies should be considered on a case by case basis, thinking about the impact on each individual resident and their circumstances.
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		Our complaint procedures and response templates specifically require investigating officers to set out how any identified faults will be put right.  We have introduced a new CRM system, and related reporting, which enables us to log resolution actions and track delivery of these more effectively.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<a href="#">Corporate complaints policy   Westminster City Council</a> <a href="https://www.westminster.gov.uk/housing/claiming-compensation">https://www.westminster.gov.uk/housing/claiming-compensation</a>	Our complaints policy indicates that we will apply the Housing Ombudsman Service approach to dispute resolution.  We have also produced a compensation policy which reflects that remedies are in line with the Housing Ombudsman Service guidance on remedies.  Our compensation and remedies procedure details the different remedies that we should consider when resolving a complaint and our complaints procedures

## Section 8: Putting things right

Code provision	Code requirement	Comply?	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>	No	<p><a href="https://www.westminster.gov.uk/media/document/complaints-annual-review-2022-23">https://www.westminster.gov.uk/media/document/complaints-annual-review-2022-23</a></p>	<p>We carry out an annual review of complaints performance which is published in autumn each year following consideration by the appropriate Council committees.</p> <p>Our 2023-24 report will be published in autumn 2024 and it will cover all the requirements of the new Code.</p> <p>Due to meetings schedules we cannot currently approve and publish this by 30 June 2024, as required by the Code.</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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No	<a href="#">Complaints   Westminster City Council</a> <a href="#">Agenda for Audit and Performance Committee on Tuesday 24th October, 2023, 6.30 pm   Westminster City Council</a> <a href="#">Printed minutes 24th-Oct-2023 18.30 Audit and Performance Committee.pdf (westminster.gov.uk)</a>	<p>Our annual complaints report is available on the Council's complaints webpage.</p> <p>It is discussed by the Audit and Performance Committee. For 2022-23 report, the Committee's response is included in the minutes which are published on the website alongside the report.</p> <p>Due to meetings schedules we cannot currently approve and publish this by 30 June 2024, as required by the Code.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Housing services will carry out routine reviews of their compliance with this Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Housing services will comply with this requirement where applicable.
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	Yes		Housing services will comply with this requirement where applicable.

	for returning to compliance with the Code.			
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### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply?	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		We have a learning framework for housing complaints and our new CRM system will improve information about themes and learning which will be reported regularly to services and senior leaders.
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		We have developed a more dynamic approach to monitoring trends from complaints through our new CRM system to help drive improvements.  We have introduced a quality assurance framework to monitor how we are performing and a learning framework to ensure we are identifying and implementing learning.
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	<a href="#">Agenda for Audit and Performance Committee on Tuesday 24th October, 2023, 6.30 pm   Westminster City Council</a>  <a href="#">Printed minutes 24th-Oct-2023 18.30 Audit and Performance</a>	The annual report on complaints to Audit and Performance committee includes a summary of learning and improvements. This is published on the website.  The Audit and Performance Committee is a meeting in public, therefore the committee's comments on the items presented in each forum are captured within the minutes,

			<a href="#">Committee.pdf (westminster.gov.uk)</a> <a href="#">Shape the housing service   Westminster City Council</a>	<p>published online and therefore available to any interested party.</p> <p>We have a Resident Forum which meet monthly. The Forum received an overview of complaints performance, trends and learning in May 2024.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<a href="#">Chief Executive and the Executive Leadership Team   Westminster City Council</a>	<p>The Strategic Director of Housing and Commercial Partnerships has overall accountability for complaints management in housing.</p>
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="#">Cabinet   Westminster City Council</a>	<p>The Cabinet Member for Housing has lead responsibility for housing complaints.</p> <p>The Cabinet Member for Resident Participation, Consultation Reform and Leisure has responsibility for wider council complaints.</p>

9.6	<p>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.</p>	Yes		<p>Performance is reported to the Cabinet Member for Housing each month, including all housing ombudsman reports and determinations. The cabinet member is held to account through the Council's scrutiny process.</p> <p>Audit and Performance Committee has overall responsibility for monitoring and scrutinising performance of council services, including complaints.</p> <p>We also report on complaint handling to the Council's Statutory Officers Group</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <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		<p>Complaint performance is reported to the Cabinet Member for Housing each month, including all housing ombudsman reports and determinations. The Cabinet Member also receives the annual complaints report.</p> <p>To broaden oversight of housing complaints, an annual housing complaints report will be presented to Housing and Regeneration Policy and Scrutiny Committee which will include information about volumes, trends, timeliness, outcomes and Ombudsman determination findings.</p>

9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c) act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes		<p>We have a standard objective in relation to complaints which is also incorporated in our procedures and explains that staff involved in the management and response to complaints are responsible for:</p> <ul style="list-style-type: none"> <li>• working collaboratively to resolve resident issues</li> <li>• taking shared responsibility for addressing areas of development identified through complaints</li> <li>• Acting in accordance with any relevant professional registration that they hold.</li> </ul>
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