

Westminster Community Homes Self-Assessment against the Housing Ombudsman Code 2024

Westminster Community Homes (WCH) is a small provider with less than 1,000 homes. We are a unique RP which is owned, but not controlled by Westminster City Council (WCC). WCH has a service level agreement with WCC, they provide our management and complaints service, this is overseen by WCH officers and our governing body. In 2024 we have reviewed WCC policy and the procedure around handling our complaints and have made a number of improvements which we am hopeful will lead to greater clarity and compliance as well as an improved customer journey.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a</i>	Yes	www.westminstercommunityhomes.org.uk/complaints-process www.westminster.gov.uk/about-council/corporate-complaints-policy	Our definition of a complaint in the Westminster City Council (WCC) complaints policy and housing complaints procedures is consistent with this wording. We refer to this policy throughout this self-assessment.

	<i>resident or group of residents.'</i>			
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	This is evidenced in the complaints policy. 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. WCC complaint handling training specifically advises our staff that residents do not need to use the word complaint, for it to be logged as such. The 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.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	The complaints policy sets out the difference between a service request and a complaint. 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. We are able to report on service requests that have been made via the complaints process from our new customer relationship management (CRM) system.
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	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	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

	remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.			to resolve issues should continue whilst the complaint is being investigated.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes		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.

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	www.westminster.gov.uk/about-council/corporate-complaints-policy	
2.2	A complaints policy must set out the circumstances in which a matter will not be	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	This is outlined within WCC complaints policy, website and

	<p>considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		Complaints Westminster City Council	<p>also correspondence with residents. The complaints policy and housing complaints procedures include clear definitions of what can and cannot be considered as a complaint.</p>
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	<p>This is clear within the policy we follow.</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	www.westminster.gov.uk/about-council/corporate-complaints-policy	<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. We have template responses to ensure that the information we provide is consistent, which includes signposting to</p>

				the Housing Ombudsman Service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	Each complaint is considered on its own merits and our policy sets out some areas where exceptions may be made.

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	www.westminster.gov.uk/about-council/corporate-complaints-policy Equality duties Westminster City Council https://www.westminster.gov.uk/about-council/contact-us/contact-us-using-british-sign-language-interpreter	<p>WCC manage our properties and accept complaints via post, email, telephone, elected member, in person and online directly to us 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</p>

				which are available on request. We also have a corporate sign language interpreter scheme.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	WCC 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. We have also refreshed our housing induction programme for new starters and this includes 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		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

				<p>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.</p> <p>This also reminded residents of how to make a complaint.</p>
3.4	<p>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.</p>	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p> <p>Complaints Westminster City Council</p>	<p>This information is provided in WCC complaints policy is available in a range of formats including:</p> <ul style="list-style-type: none"> • A full PDF version on the website • A summary embedded into our webpages which are compliant with accessibility requirements. • Periodic articles in the resident newsletter <p>Translations into other languages, easy reads and large print versions are available on request.</p>
3.5	<p>The policy must explain how the landlord will publicise details of the complaints policy,</p>	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p>	<p>WCC complaints policy includes details of the Housing Ombudsman</p>

	including information about the Ombudsman and this Code.			Service and makes reference to managing housing complaints in line with the Complaint Handling Code.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy Complaints Westminster City Council	<p>The complaints policy makes it clear that representatives can make complaints on behalf of a resident.</p> <p>The Council website also makes it clear that representatives can deal with a complaint or accompany residents to a meeting.</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy www.westminstercommunityhomes.org.uk/complaints-process	<p>Information about how to contact the Housing Ombudsman Service is included in our complaints policy and stated on our website. 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.</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		<p>A dedicated complaints team is in place for Housing Services.</p> <p>There is a corporate complaints manager who ensures complaints performance across the council is reported to the relevant scrutiny panels. All Stage 2 complaints must now be signed off by WCH CEX.</p>
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 WCC Complaints Team has access to Officers, Managers and Senior Managers to assist with complaint resolution. We have a team of housing officers dedicated to WCH only, who can facilitate the prompt resolution of complaints</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 officers have access to monthly reports of performance and trends and we have agreed a new learning framework.</p> <p>All WCC 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>
-----	---	-----	--	--

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	www.westminster.gov.uk/about-council/corporate-complaints-policy Complaints Westminster City Council	WCC Manage WCH properties and complaints, the Council's policy is adopted.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy Complaints Westminster City Council	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	www.westminster.gov.uk/about-council/corporate-complaints-policy Complaints Westminster City Council	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 must not be expected to go through two complaints processes.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	All complaints are led directly by the Council, and come to WCH for final review and sign off. WCH complaints are to be put on WCH letterhead.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		WCH see all complaints and have access to all complaints data managed on CRM.
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: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and 	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	The 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

	d. consider all relevant information and evidence carefully.			
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	The policy makes it clear that when an investigation will require more than the target response time to complete, we will keep residents informed. 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.
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	Complaints Westminster City Council www.westminster.gov.uk/about-council/corporate-complaints-policy Equality duties Westminster City Council	Our website complaints are directed to WCC's online form. The form asks all residents to let us know about any reasonable adjustments so we can adjust our services accordingly. Our new CRM system allows responsible personnel to add alerts for residents who have health or support needs, which includes disabilities. 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.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy Complaints Westminster City Council	WCC 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	www.westminster.gov.uk/about-council/corporate-complaints-policy Claiming compensation Westminster City Council	WCC 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.
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	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	The complaints policy sets out how we and WCC manage unreasonable behaviour and this is supported by a housing unreasonable behaviour and

	putting any restrictions in place and must keep restrictions under regular review.			unreasonably persistent contact procedure.
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	Equality duties Westminster City Council	We follow the Council's 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: 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		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. Where a complaint is about complex issues this is reviewed by senior officers as

				<p>part of the triage process to identify the most appropriate person to lead the response. Our complaints procedure includes guidance on investigating complaints from vulnerable residents which is supported by complaints training for complaint handlers.</p>
6.2	<p>Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u></p>	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p>	<p>This is set out in our complaints policy. Although we did not have a separate target for acknowledging a complaint, we know that in 2023/24 the timeliness of our acknowledgements was inconsistent. We have worked with WCC to make a number of changes to our processes, procedures and internal systems to make sure we improve in this area.</p>
6.3	<p>Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.</p>	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p>	<p>WCC complaints policy sets out that all complaints should be responded to within 10 working days at stage 1.</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</p>	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p>	<p>WCC policy sets out our approach to extending the target response time on complaints. The complaints procedures outline that various points</p>

	working days without good reason, and the reason(s) must be clearly explained to the resident.			within the investigation stage should trigger a review of whether more time would be needed to respond to a complaint.
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		WCC complaint procedures set out the 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.
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		WCC 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	Yes		WCC complaints procedure provides guidance to complaint handlers on how to

	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.			deal with new issues raised during the investigation, this is supported by complaint handling training.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes		These points are included in our response templates.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	All requests for a stage 2 escalation are reviewed by a senior complaints officer and signed off by WCH CEX.

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	www.westminster.gov.uk/about-council/corporate-complaints-policy	This is set out in the 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	www.westminster.gov.uk/about-council/corporate-complaints-policy	This is set out in the complaints policy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	Senior complaints officers work in partnership with the appropriate Head of Service at WCH to review stage 2 complaints. This ensures that there is impartiality in the investigation.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy	The complaints policy sets out that all complaints should be responded to within 20 working days at stage 2.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy	We have template letters for extending complaint timescales which include information about how to approach the Housing Ombudsman Service.

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		WCC complaint procedures set out the 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.
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		Complaint procedures and complaint handling training addresses how to investigate a complaint in line with the Housing Ombudsman Service guide to dispute resolution.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes		This is included in our letter templates.

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Senior complaints officers work in partnership with the appropriate Head of Service at WCH to review stage 2 complaints.

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"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; 	Yes	<p>www.westminster.gov.uk/about-council/corporate-complaints-policy</p> <p>Claiming compensation Westminster City Council</p>	WCC set out approach to remedies in the complaints policy and to paying compensation in our housing compensation policy.

	<ul style="list-style-type: none"> Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy Claiming compensation Westminster City Council	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.
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	www.westminster.gov.uk/about-council/corporate-complaints-policy Claiming compensation Westminster City Council	Our complaint procedures and response templates specifically require investigating officers to set out how any identified faults will be put right.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	www.westminster.gov.uk/about-council/corporate-complaints-policy Claiming compensation Westminster City Council	<p>The complaints policy indicates that we will apply the Housing Ombudsman Service approach to dispute resolution.</p> <p>WCC also produced a compensation policy in 2024 which reflects that remedies are in line with the Housing</p>

				Ombudsman Service guidance on remedies.
--	--	--	--	---

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and 	Yes	www.westminstercommunityhomes.org.uk/complaints-process	We carry out an annual review of complaints performance which is published on our website, once it had been approved by our governing body to do so.

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
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	www.westminstercommunityhomes.org.uk/complaints-process	Westminster Community Homes now carry out a separate review of Complaints Handling by WCC and procedures, the Complaints Performance and Improvement report 2024 was provided to WCH's governing Board in September 2024. The governing body's response was to note improvements being made to our service and by the end of this year and that our lessons learnt and actions stated at the end of the report, are being monitored.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		WCH 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		WCH will comply with the 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 for returning to compliance with the Code.	Yes		WCH will comply with the requirement where applicable.
-----	---	-----	--	--

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		WCH use this approach to annual tenant satisfaction surveys. WCC also 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	Yes		We have developed a more dynamic approach to monitoring trends from complaints through our new

	to identify issues and introduce positive changes in service delivery.			CRM system to help drive improvements.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Agenda for Audit and Performance Committee on Tuesday 24th October, 2023, 6.30 pm Westminster City Council	The annual report on complaints to Audit and Performance committee includes a summary of learning and improvements. This is published on the website. Going forward we will report trends for WCH complaints in annual newsletters .
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		Head of Operations and WCH CEX has overall accountability for our complaints management
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		WCH Board member Andrew Whitely is assigned this responsibility.
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	Yes		Performance is reported to WCH Board including the MRC each quatre, with complaints performance.

	performance. This person must have access to suitable information and staff to perform this role and report on their findings.			Senior officers of WCH have responsibility for monitoring and scrutinising performance the services we receive, including complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes		Performance is reported to WCH Board including the MRC each quatre, with complaints performance. Senior officers of WCH have responsibility for monitoring and scrutinising performance the services we receive, including complaints. To broaden oversight of WCH complaints, an annual complaints service and improvement report is being reported to board in addition to quarterly updates. This includes information about volumes, trends, timeliness, outcomes and will include Ombudsman determination findings.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving	Yes		Our housing management team have a standard objective in relation to complaints which is also incorporated in our procedures and explains that

	<p>complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>staff involved in the management and response to complaints are responsible for:</p> <ul style="list-style-type: none"> • working collaboratively to resolve resident issues • taking shared responsibility for addressing areas of development identified through complaints • Acting in accordance with any relevant professional registration that they hold.
--	--	--	--	--