



Housing Ombudsman Complaint Handling Code Self-Assessment.



Milton Keynes City Council 2023-2024



28 June 2024

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Purpose of this report

Milton Keynes City Council continues to use customer feedback to drive change in policy and practice for the betterment of Milton Keynes. Our self-assessment gives us a formal opportunity to score our performance and identify opportunities to improve the outcomes for our residents and people visiting our city.

The Complaint Handling Code, introduced by The Housing Ombudsman (HO), sets out a good practice for Social Housing Landlords to enable them to resolve complaints raised by their residents quickly, and to use the learning from complaints to improve services.

This document is our self-assessment against the code as of June 2024

The purpose of this report is to identify areas where we are doing well, and where we recognise the need to further improve our service.

It follows a question (Q) and answer (A) structure. The questions are those asked by the HO, and the answers are from MKCC. Each question has a compliance rating which indicates our compliance with the Complaints Handling Code.

The full Complaint Handling Code is available via the following link:

www.housing-ombudsman.org.uk/the-code-2024

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Section 1 - Definition of a complaint

Code requirement	Comply	Evidence	Commentary / Explanation
<p>1.2. A complaint must be defined as: ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’</p>	Yes	Link to our policy (p3)	Our policy defines a complaint as: <i>“an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals.”</i>
<p>1.3. A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	Link to our policy (p4)	Our policy says: <i>“An individual should not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative should still be handled in line with the organisation’s complaints policy.”</i>
<p>1.4. Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request 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.</p>	Yes	Link to our policy (p3)	Our policy says: A service request may be defined as: <i>“a request that the organisation provides or improves a service, fixes a problem or reconsiders a decision.”</i>

Code requirement	Comply	Evidence	Commentary / Explanation
<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.</p>	<p>Yes</p>	<p>Link to policy (p9) To embed this standard within our workplace teams, this is included as part of MKCC's 2024-2025 corporate complaint handling training.</p>	<p>Our Complaints Policy has been refined to reflect the need for workplace teams to continue collaborating with the resident to resolve the root cause issue whilst providing a formal complaints response.</p>
<p>1.6. An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	<p>Yes</p>	<p>Throughout the last year we have conducted many Housing Consultations where residents have been invited to fill in surveys or leave observations and results are published on the webpage. As part of our customer service where the residents have left unrelated feedback and contact details, we directed the feedback to the relevant service area and inform the resident of the action and how to proceed.</p>	<p>We are committed to using tenant feedback to change the way we deliver landlord services. We need to annotate all resident engagement material with the link for raising formal complaints if the resident remains unhappy with our reply. We then need to evaluate whether we have signposted residents to our online resources when they have participated in resident engagement process.</p>

Section 2 – Exclusions

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	Yes	Link to our policy (p4)	<p>Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A.</i></p> <p>Also: <i>We will deal with complaints on their merits. & We will be clear with you about what we can and cannot deliver.</i></p>
<p>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:</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. 	Yes	Link to our policy (p9 &10)	<p>The full list of exclusions is listed in our policy that you can access via this link.</p>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>2.3. Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	<p>Yes</p>	<p>Link to our policy (p9) Corporate webpage</p>	<p>Our policy says: <i>You should let us know as soon as possible if there is a problem. If you have left it more than 12 months since knowing about the problem, we will use our discretion when deciding if we will consider your complaint.</i></p>
<p>2.4. If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	<p>Yes</p>	<p>Link to our policy (p4,7,8&9)</p>	<p>We acknowledge complaints within 5 working days.</p> <p>Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A. This definition should be interpreted widely. If in doubt a matter should be recorded as a complaint.</i> Our policy has been revised to reflect a broader view of what a complaint is.</p>
<p>2.5. Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	<p>Yes</p>	<p>Link to our policy (p4)</p>	<p>Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A. Also: We will deal with complaints on their merits. & We will be clear with you about what we can and cannot deliver.</i></p>

Section 3 - Accessibility and awareness

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p3)</p>	<p>Our complaints policy says: <i>It is important that all members of the community have equal access to our Customer Feedback Policy. If customers need additional support to raise their complaints.</i></p> <p>Our policy states that <i>there is no wrong channel to receive a complaint from a customer – it is the responsibility of colleagues to identify the complaint at the earliest opportunity.</i></p>
<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.</p>	<p>Yes</p>	<ul style="list-style-type: none"> • MKCC Housing Complaint Handling Code Self-Assessment 2022-23 LIVE! Published on our internal staff SharePoint site. The news raised awareness of the complaints handling process and upcoming training. • Our new Complaints Policy and Complaints Handling Code Awareness training were added to MyCompliance, a system we use for compulsory online training that can be monitored and escalated. 	<ul style="list-style-type: none"> • All published Housing Updates are stored in Housing Systems and Business Improvement Public Channel. • In 2023-2024 we also updated our policies and processes in line with the regulatory guidance. We have asked all colleagues to read the new policy and process and to confirm they have understood it.

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p><u>Housing Annual Complaints Report 2023-2024</u></p>	<p>We continue to use customer feedback to drive change in policy and practice for the betterment of Milton Keynes. Our self-assessment gives a formal opportunity to score our performance and identify opportunities to improve the outcomes for residents and people visiting our city. In 2023-2024 we have noted the considerable increase in complaints across our Housing Services which is reflective of our engagement work through service charge consultation process, tenant perception surveys complimented by HO's media campaign encouraging tenants to communicate with their landlord if something is not right.</p>
<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.</p>	<p>Yes</p>	<p><u>Corporate Complaints webpage</u> <u>Housing Complaints webpage</u></p>	<p>Our complaints policy can be found on our website:</p> <ul style="list-style-type: none"> ● On the main complaints page. ● On the housing complaints page.

Code requirement	Comply	Evidence	Commentary / Explanation
<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.</p>	<p>Yes</p>	<p>Link to our policy (p5,7,8&9) Housing Complaints webpage Complaints Handling Code webpage Housing Annual Complaints Report</p>	<p>Contact information for the Housing Ombudsman is contained within our complaints policy as well as links to the website for more information about the code we also signpost to the HO throughout the complaints process.</p>
<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.</p>	<p>Yes</p>	<p>Link to our policy (p3&4)</p>	<p>Our complaints policy says: <i>A complaint that is submitted via a third party or representative should still be handled in line with the organisation's complaints policy.</i></p>
<p>3.7. Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.</p>	<p>Yes</p>	<p>Link to our policy (p7)</p>	<p>Our complaints policy says: <i>If you remain unhappy it is your right to contact the Housing Ombudsman. The Ombudsman's role is to investigate complaints of maladministration by Local Authorities.</i></p>

Section 4 - Complaint handling staff

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p5)</p>	<p>Our complaints policy says: <i>Our Head of Customer Data and Insight has corporate responsibility for overseeing the process and reporting performance against our local completion times and Ombudsman targets.</i> Our Corporate Customer Services Team is responsible for triaging the complaints, and liaising with service managers when they are investigating and resolving their complaints.</p> <p>Our Corporate customer Service Manager holds the relationship for the Housing Ombudsman, acting as MKCC’s link Officer.</p>
<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.</p>	<p>Yes</p>		<p>We have clear, documented procedures and processes to trigger a complaint case review which initiates a multi-disciplinary team to identify and own actions to resolve root causes identified by the complaint.</p>

Code requirement	Comply	Evidence	Commentary / Explanation
<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</p>	<p>Yes</p>	<p>Housing Complaints Board Also see evidence and commentary for 3.2</p>	<p>Our governance model has been enhanced by the formulation of our Housing Complaints Board. This serves as our internal multi housing disciplinary panel tasked with conducting critical case reviews for escalated complaints, sharing organisational learnings, and proposing policy or operational changes with MKCC's Landlord Board for next steps.</p>

Section 5 – The complaint handling process

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	Yes	<p>Link to our policy Housing Complaints webpage</p>	<p>All residents who make a complaint will be treated in the same way as per our complaints policy. We provide information about our complaints process also on our website, although the information explains our process in the same as we do in the policy. Our website may be used to provide some additional information, but that will only concern things that are required by the Complaints Handling Code but are not covered by our Complaints Policy.</p>
<p>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.</p>	Yes	<p>Link to our policy (p3)</p>	<p>We do not have stage 0. In relation to early resolution, our policy says: <i>The starting point is a shared understanding of what constitutes a service request and what constitutes a complaint. We should be able to put things right through normal service request providing organisations with opportunities to resolve matters to an individual’s satisfaction before they become a complaint.</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>Our complaints process is a two-stage process.</p>
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>If one of our contractors is responsible for the Stage One response, this will count as being the first stage of MKCC’s complaint process and residents will not be expected to raise a separate case with us directly.</p>
<p>5.5. Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>We work closely with our contractors to ensure that they apply our corporate complaints policy and undertake Customer Service training delivered by ourselves.</p>
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p5&6)</p>	<p>Our policy says: Stage 1 - <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days. We will also summarise the main issues you are raising and the outcomes you are seeking if we have not accurately reflected what you are unhappy about, please let us know as soon as possible.</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
			<p>Stage 2 - Complaint responses will be completed within a total of 20 working days from the acknowledgement date of the complaint. To do so, we will need to understand:</p> <ul style="list-style-type: none"> • What you are specifically unhappy about within the stage one response. • The impact of on you of the concerns you have raised. • What you expect the Council to do to put things right Your feedback on these points will be considered. <p>If we believe the stage one response answered all these points, or if we need clarification on any of them, we will contact you. We will then follow our acknowledgement process.</p>
<p>5.7. When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.</p>	<p>Yes</p>	<p>Link to our policy</p>	<p>As per above (5.6). As a part of acknowledgement we would confirm clearly which aspects of the complaint we are and are not responsible for.</p>
<p>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,</p>	<p>Yes</p>	<p>Link to our policy (p5)</p>	<p>Our policy says: <i>We will:</i></p> <ul style="list-style-type: none"> • deal with complaints on their merits. • act independently and have an open mind.

Code requirement	Comply	Evidence	Commentary / Explanation
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 d) consider all relevant information and evidence carefully.			<ul style="list-style-type: none"> • <i>take measures to address any actual or perceived conflict of interest.</i> • <i>consider all information and evidence carefully.</i>
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	Link to our policy (p6)	<p>Our complaints policy says:</p> <p>Stage 1 – <i>Complaints will be completed within a maximum of 20 working days from the date of acknowledgement. This is unless we explain why we cannot complete the complaint investigation within that time frame and agree a date with you for completion of the complaint investigation.</i></p> <p>Stage 2 – <i>Depending on the complexity of the investigation we may need to extend the timescales for stage two investigations by an additional 10 working days, but this will be agreed with you in good time. We will keep you up to date on progress at agreed intervals.</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>5.10. Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	<p>No (Partial)</p>	<p>Link to our policy (p3)</p>	<p>Our Corporate complaints policy reflects the need to consider the use of reasonable adjustment and its associated record keeping requirements on landlord back-office systems – practice will be implemented in the current financial year 2024-2025.</p>
<p>5.11. Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.</p>	<p>Yes</p>	<p>Link to our policy (p7)</p>	<p>Our complaints policy says:</p> <p>Stage 1 – <i>If you are not happy with the response you receive at stage one, you can contact us within a month and ask for your complaint to be investigated at stage two.</i></p> <p>Stage 2 – <i>We would expect you to send us a stage two request within a month of the date of our stage one response. We will use our discretion when considering stage two requests received after this. We would not consider any stage two request once 12 months have elapsed after the stage one response unless there is a compelling reason to do so.</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>5.12. A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.</p>	<p>Yes</p>		<p>This is recorded in our customer relationship management system.</p>
<p>5.13. Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.</p>	<p>Yes</p>	<p>Link to our policy (p7)</p>	<p>Our complaints policy says: <i>Providing a remedy is about putting right what has gone wrong and learning from it. We will aim to remedy any personal injustice to you where an investigation into a complaint has identified fault on the part of the Council. There must be a clear link between the fault and the personal injustice to you.</i></p>
<p>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.</p>	<p>Yes</p>		<p>We use the tenancy agreement agreed between us and the tenant as the key management tool for relationship standards between both parties. Our corporate policy for managing unreasonable behaviour from residents/their representatives has been in place for a significant period and was last reviewed during Covid. Following the recent</p>

Code requirement	Comply	Evidence	Commentary / Explanation
			publication of the Local Government Ombudsman guidance, our current unreasonable behaviour policy is under corporate review, led by our Head of Customer, Data and Insight and will be republished later this year
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		See 5.14 commentary.

Section 6 – Complaint stages

Stage1

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	Yes	Link to our policy	Our complaints policy says: <i>Time for stage 1 complaints is 20 working days plus 10 working days for complex cases.</i> We do recognise some of the more complex may be longer to complete. From a complaints standpoint, it is imperative that the customer can clearly express the desired outcome from the complaints that they have raised, and that they are able to comprehend and participate in the consecutive stages of the complaints process as stipulated by the policies and practices of the landlord
<p>6.2. Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u></p>	Yes	Link to our policy (p5)	Our complaints policy says: <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>6.3. Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.</p>	<p>No</p>	<p>Link to our policy (p4)</p>	<p>As per 6.1. our current timescale for stage 1 complaints response is 20 days plus 10 days for complex cases. Our complaints policy acknowledges that we are not meeting Ombudsman’s expectations, as per the following: <i>We acknowledge that the complaint handling code from Housing Ombudsman expect stage one complaints to be completed within 10 working days. We are ambitious and working hard to reduce our timescales in line with these expectations and will be closely monitoring our performance. Our current timescales are below, and these will be kept under review for the next 12 months.</i></p>
<p>6.4. Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.</p>	<p>Yes</p>	<p>Link to our policy (p5&6)</p>	

Code requirement	Comply	Evidence	Commentary / Explanation
<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.</p>	<p>No</p>	<p>Link to our policy (p7)</p>	<p>Our Complaints policy has been updated to reflect the required standard and our practices are evolving to do the same.</p>
<p>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.</p>	<p>Yes</p>	<p>Housing Complaints Dashboard Housing Complaints Board</p>	<p>Complaint responses are shared with the customer once the investigation is completed - in some cases, the resolution to the complaint may take longer and we will keep the customer informed of progress. Actions committed to within a complaint response to resolve the root cause of the complaint, are managed separately by the responsible service area with fidelity checked by our Housing Complaints Board.</p>
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>Our complaints policy says: <i>In your stage one complaint response we will clearly provide information on:</i></p> <ul style="list-style-type: none"> • <i>the complaint stage,</i> • <i>the complaint definition,</i> • <i>the decision on the complaint,</i> • <i>the reasons for any decisions made,</i> • <i>the details of any remedy offered to put things right,</i> • <i>details of any outstanding actions,</i> • <i>details of how to escalate the matter to stage two if the resident is not satisfied with the answer.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>Any additional complaints raised by the customer which relate to the core matter, will be attached to the open complaint record for investigation and response at Stage One. If there are new matters which are unrelated to the core issue a new Stage One complaint will be raised to investigate.</p>
<p>6.9. 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"> 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. 	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>As per 6.7.</p>

Stage 2

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>As per our policy, in our response to stage 1 complaint we would advise customer how to escalate the complaint to stage 2 if they were not satisfied with the resolution.</p>
<p>6.11. Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.</p>	<p>Yes</p>	<p>Link to our policy (p5)</p>	<p>Our complaints policy says: <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days.</i></p>
<p>6.12. Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.</p>	<p>Yes</p>	<p>Link to our policy (p6)</p>	<p>Our complaints policy says: <i>Complaint responses will be completed within a total of 20 working days from the acknowledgement date of the complaint. To do so, we will need to understand:</i></p> <ul style="list-style-type: none"> • <i>What you are specifically unhappy about within the stage one response.</i> • <i>The impact of on you of the concerns you have raised.</i> • <i>What you expect the Council to do to put things right.</i> <p><i>Your feedback on these points will be considered. If we believe the stage one response answered all of these points, or if</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
			<i>we need clarification on any of them, we will contact you. We will then follow our acknowledgement process.</i>
6.13. The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes		This is a standard practice for complaints investigation at MKCC
6.14. Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Link to our policy (p6)	Our policy says <i>Complaints responses will be completed within a total of 20 working days from the acknowledgement date of the complaint.</i>
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	Link to our policy (p6)	Our policy states: <i>Depending on the complexity of the investigation we may need to extend the timescales for stage two investigations by an additional 10 working days, but this will be agreed with you in good time. We will keep you up to date on progress at agreed intervals.</i>
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.	No	Link to our policy (p7)	Our complaints policy has been updated to reflect the required standard and our practices are evolving to do the same.

Code requirement	Comply	Evidence	Commentary / Explanation
<p>6.17. A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.</p>	<p>No</p>	<p>Link to our policy (p7)</p>	<p>Our complaints policy has been updated to reflect the required standard and our practices are evolving to do the same.</p>
<p>6.18. Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.</p>	<p>Yes</p>	<p>Link to our policy (p6 &7)</p>	<p>Our complaints policy says: <i>In your stage two complaint response we will clearly provide information on:</i></p> <ul style="list-style-type: none"> • <i>the complaint stage,</i> • <i>the complaint definition,</i> • <i>the decision on the complaint,</i> • <i>the reasons for any decisions made,</i> • <i>the details of any remedy offered to put things right,</i> • <i>details of any outstanding actions, and</i> • <i>details of how to escalate the matter to the Housing Ombudsman Service if you remain dissatisfied.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>6.19. 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"> 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 the Ombudsman Service if the individual remains dissatisfied. 	Yes	Link to our policy (p6&7)	As per 6.18.
<p>6.20. Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	Link to our policy (p6&7)	Our complaints process is a 2-stage process, and it will involve all those staff members that are needed to provide our full response.

Section 7 - Putting things right

Code requirement	Comply	Evidence	Commentary / Explanation
<p>7.1. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance, or reason. • Taking action if there has been delay. • Reconsidering or changing a decision. • Amending a record or adding a correction or addendum. • Providing a financial remedy. • Changing policies, procedures, or practices. 	<p>Yes</p>	<p>Link to our policy (p7)</p>	<p>Our complaints policy says: <i>Providing a remedy is about putting right what has gone wrong and learning from it. We will aim to remedy any personal injustice to you where an investigation into a complaint has identified fault on the part of the Council. There must be a clear link between the fault and the personal injustice to you.</i></p> <p><i>The remedies we may offer are not necessarily about money. We would look to put you back into the position you would have been in if nothing had gone wrong. We would also look at the root cause of the complaint and aim to make sure that the fault does not happen again. We may issue a financial payment to reimburse you if you have suffered a quantifiable financial loss, or it might be more of a symbolic payment which serves as an acknowledgement of the distress or difficulties you have been put through.</i></p> <p><i>We do not offer compensation in the way</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
			<p><i>a court would. In some cases, an appropriate remedy may be for us to apologise to you for the fault that caused the injustice. We may look at making a change to a practice, policy, or procedure if we think it is likely that further mistakes may affect other people in the future. When considering an appropriate remedy to a complaint, we will use our compensation policy, which is closely aligned to the Local Government Guidance on Remedies. You can find this document on the Ombudsman's website at www.lgo.org.uk</i></p>
<p>7.2. Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	<p>Yes</p>	<p>Link to our policy (p7)</p>	<p>As per 7.1.</p>
<p>7.3. The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.</p>	<p>Yes</p>	<p>MKCC Compensation Policy (This is internal document)</p>	<p>Our compensation policy specifies 3 levels of compensation we can offer, based on 3 categories of our fault. The detailed descriptions help colleagues to decide if remedy is needed, and what type of compensation should be granted. Even though the policy does not specify the</p>

Code requirement	Comply	Evidence	Commentary / Explanation
			timescales, once the compensations has been agreed we would follow it through to completion as soon as possible.
7.4. Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Our compensation policy is based on the guidance issued by the Ombudsman – complaint responses are considered against our policy and reviewed independently before issuance to the resident to implement practice fidelity.

Section 8 - Self-assessment, reporting and compliance

Code requirement	Comply	Evidence	Commentary / Explanation
<p>8.1. 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"> 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 f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	<p>Yes</p>	<p>See attachment in 3.3 Annual Report - Tenant and Leaseholders 2022-2023 (Section 10. This is last year example as this year is yet to be published)</p>	<p>Current scrutiny reporting for landlord complaint performance is being reviewed in line with the new HO requirements. Our first submission report on 2023/2024 will be published on the website and submitted to Landlord for review.</p> <p>We also include complaints as part of our Tenant and Leaseholder annual report. We are in the process of publishing this year’s report that will then be available on our webpage.</p>

Code requirement	Comply	Evidence	Commentary / Explanation
<p>8.2. The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	<p>Yes</p>	<p>Housing Annual Complaints Report 2023-2024</p>	<p>Annual complaints report is shared with Housing Complaints Board, Landlord Board, and our Corporate Leadership Team.</p>
<p>8.3. Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	<p>Yes</p>	<p>N/A</p>	<p>In the last year we have not had any significant restructure or process change.</p>
<p>8.4. Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	<p>Yes</p>	<p>N/A</p>	<p>In the last year we have not been asked to update our self-assessment by Ombudsman.</p>
<p>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.</p>	<p>Yes</p>	<p>N/A</p>	<p>In the last year we have not had any incident that would affect our compliance with the code.</p>

Section 9 – Scrutiny and oversight continuous learning and improvement

Code requirement	Comply	Evidence	Commentary / Explanation
<p>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.</p>	Yes	<p>Link to our policy (p7)</p>	<p>Our complaints policy says: <i>(as a part of remedy) we may look at making a change to a practice, policy, or procedure if we think it is likely that further mistakes may affect other people in the future.</i></p>
<p>9.2. A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</p>	Yes	<p>>Link to our policy >MKCC Complaints webpage >Housing Complaints webpage >Complaints Handling Code webpage >Housing Annual Complaints Report 2023-2024 >Annual Tenants and Leaseholders Annual Report 2022-2023 Housing Complaints Board</p>	<p>We have various webpages that promote a positive complaint handling culture. We assure residents to <i>not worry that if you make a complaint, we will treat you unfavourably because of it, this will not happen. You have the right to tell us if something is wrong and we need to know.</i></p> <p>In our 2023-2024 Tenants and Leaseholders Annual Report we also said: <i>We received 15% more complaints this year compared to last. This increase indicates you are becoming more aware and confident in raising your concerns with us and we're listening. We have successfully resolved 588 complaints this year.</i></p>

Code requirement	Comply	Evidence	Commentary / Explanation
			As part of our landlord governance model, we have incorporated a Housing Complaints Board (HCB) which is focussed on critical case review, risk identification and improvements highlighted through complaints and tenant feedback. HCB has a regular reporting schedule to the Landlord Board.
<p>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.</p>	<p>Yes</p>	<p>See 9.2 Housing Updates SharePoint site for internal staff</p>	<p>See 9.2</p>
<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.</p>	<p>Yes</p>		<p>Our corporate lead for complaints is our Head of Customer Data and Insight and they are the accountable person for all complaints that come into the City Council including those related to our role as a landlord. The Head of Customer Data and Insight reports up to the MKCC Landlord Board who owns the strategic responsibility of its Housing portfolio, taking direction and guidance from the Authority’s Corporate Leadership Team, and comprises of 7 senior directors, led by Chief Executive. The Senior</p>

Code requirement	Comply	Evidence	Commentary / Explanation
			Director for Customer and Community Services is accountable for complaint handling across the authority and leads an improvement board focussed on evaluating themes, identifying potential systemic issues, and mitigating against serious risk.
<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').</p>	Yes		The Cabinet member for Housing holds this responsibility.
<p>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.</p>	Yes		As per 9.5
<p>9.7. 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>	Yes	Housing Complaints Board agenda	

Code requirement	Comply	Evidence	Commentary / Explanation
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.			
9.8. Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments, b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others, and c) act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	MKCC Values and Expectations What makes us Milton Keynes City Council brochure	<p>We have our corporate values and expectations that covers all these points. They fall under four main categories:</p> <ul style="list-style-type: none"> • We are Dedicated. • We are Respectful. • We are Collaborative. • We are Milton Keynes City Council <p>We advertise those values across our council building, as well as in our weekly One Council email to all staff, and on our website.</p>

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