



Winchester

City Council

Winchester City Council Self-Assessment September 2025

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaint's performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Website: [Housing Complaints & Compliments - Winchester City Council](#)

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints policy Website Staff complaints awareness training sessions	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints procedure Staff complaints training Resident engagement session- TIA group	
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	Complaints policy Complaints procedure Website Staff complaints training Process in place for logging service requests	

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints policy & procedure Staff complaints training	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Complaints policy Staff complaints training improving awareness	

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints policy – sets out what is and isn't a complaint	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • 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	<p>Complaints policy Policy & procedure set out where a matter will not be investigated as a complaint</p> <p>Complaint response letters set out reasons when a complaint will not be considered</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.	Yes	Procedure updated June 2024 V4	
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.	Yes	Complaints policy & procedure Set out under the exclusion section of the procedure	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Procedure Staff complaints training	Procedure sets out grounds for refusing a complaint and take an individual approach to this, Section 4, point 4

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	Online, to an Officer, in person, via an advocate, email, over the phone, post, social media – this has been covered through Staff complaints training Local brief, resident newsletters Website Translated letters Policy	
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	Local Brief & Newsletters Staff training	
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	Complaints promoted to all staff through staff newsletter, training	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	Complaints policy	We have engaged residents through Housing Improvement workshop to

	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.		Provide a copy of policy with complaint acknowledgement letter/email	<p>hear feedback on barriers to making a complaint/accessing the complaints policy</p> <p>Complaints policy shared with complainants as part of formal acknowledgement stage.</p> <p>Copy of policy shared with Complaints focus group for review and feedback.</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	Complaints policy Website	Under 'Housing Complaint Handling Code' section of policy
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints policy	Set out in complaints policy, section 6 and under section 'Complaints through a representative'
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints policy Website Stage 2 response letters Ombudsman posters on noticeboards in blocks	Set out in 'Next steps' section of complaints policy

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	Roles in place for this work- dedicated Housing Performance Officer, CEX team (Stage 2) Customer Service team log formal complaints received via online form or if they take the complaint	Customer Service team log and assign complaints received via online forms, telephone, email or in person Housing Performance Officer oversees day to day coordination and tracking of housing complaints working with the Service Lead- Landlord services Housing Policy & Projects Manager reports complaints performance quarterly to TACT (Tenant and Council Together) Board
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	Role works alongside Service leads to ensure responses are dealt with in line with policy	
4.3	Landlords are expected to prioritise	Yes	Local Brief-housing staff	Staff complaints training 74

	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		newsletter complaints training promoted. Learning from complaints delivered through training Spotlight reports shared and disseminated across teams	colleagues attended training for complaints awareness / handling relevant to their role Complaints and sector insights discussed at Divisional management team meetings
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Policy aligned with corporate	Service delivery continues to be a priority – we survey residents who have made a complaint Sent invites to 80 residents who had been involved in making a complaint to invite them to get involved with a resident's complaints scrutiny panel
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	Yes	Complaint policy Website Do encourage early resolution at a team level which is agreed with the resident	Introduced way to report and capture local resolutions which are included in performance reporting narrative

	confusion.			
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	Policy	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints procedure	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints policy Contract meetings discuss complaints	Minutes
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	Complaint definition is set out in acknowledgement letter and in formal response letter Complaints sample checks introduced Q3 24/25 which reviews letters to ensure included	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are,	Yes	Complaint acknowledgment letters	Complaint acknowledgement letters/correspondence set

	and are not, responsible for and clarify any areas where this is not clear.			out the requirement to clarify and summarise what the complaint is about when communicating with the complainant. If this is unclear the Officer will make contact to clarify this.
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 d. consider all relevant information and evidence carefully. 	Yes	Staff complaints training Our procedure sets out how we investigate complaints and where further clarification is required contact is made to seek this	
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	Complaints policy Holding response letter/email communication	Investigating Officer will make contact to advise where we are not able to provide a response within timeframe. Complaints audit process reviews this to ensure policy is adhered to
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.	Yes	Information disclosed would be updated on our core system to ensure any specific needs were	Letters translated into Ukrainian as well as saving copy of letter in English

	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.		considered as part of the complaint handling.	Complaint acknowledgement letter reviewed by readers panel & scrutiny group
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	Policy	Work closely with Executive Assistant team when escalating complaints to Stage 2
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	Information /record keeping flow chart Staff training Procedure	Information held across complaints recording system and electronic document management system Any correspondence relating to the complaint is saved on relevant document management system for the individual complainant
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.		Staff training Procedure	
5.14	Landlords must have policies and	Yes	Unreasonable persistent	

	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.		complaints behaviour policy website	
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	Policy-Managing persistent complaints behaviour	EQIA for unreasonable persistent complaints behaviour policy Public Sector Duty Individual approach – need to confirm how this is managed talk to investigating managers

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	Complaints policy 'How the complaint will be handled section'	
6.2	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>	Yes	Complaints policy	This is set out within our policy and procedure We carry out sample checks quarterly of complaints handling to identify any cases where the policy has not been followed feedback is shared from this with relevant officers/managers
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being	Yes	Policy & procedure	Response times are set out within our policy and procedures

	acknowledged.			<p>Stats completed in time We carry out sample checks quarterly of complaints handling to identify any cases where the policy has not been followed feedback is shared from this with relevant officers/managers</p> <p>Staff complaints training reinforces the timescales and action required. Procedure shared with all attendees</p>
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>Policy Sample check stats % not responded to in 10 days and confirm numbers where extensions issued</p>	100% complaints responded to in line with complaints handling code timeframes reported in June 2025 TSM submission
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	Ombudsman information added to extension timescale letter template	Extension template includes Ombudsman details
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	Yes	Complaints are responded to even where actions are outstanding which is included in the response letter	Review any complaints overdue/extended to check for any themes

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
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	Complaint response letters include this – sample checks carried out – add details Staff training Procedure – template response letters	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Policy & procedure: Notes updated on the complaints system where notified of this	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 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; e. the details of any remedy offered to put things right;	Yes	Policy & procedure Letter templates set this out Staff training Sample checks carried out quarterly– add stats	

	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.			
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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	We have a two stage complaints process set out in policy & procedure	
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	Policy & procedure	Also carry out quarterly sample checks to include response times
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	Policy updated to reflect this June 2024 Staff complaints training	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints procedure	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of	Yes	Policy	Policy & procedure updated 2025 to align Stage 2

	the complaint being acknowledged.			response times to the Code 100% response in time May & June 2025
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	Policy & procedure	
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	Ombudsman details included in holding response template	
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	Add tracking for Stage 2 to action plan	Complaints are responded to even where actions are outstanding which is included
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	Policy & procedure	Notes updated in complaints system where notified of this
6.19	Landlords must confirm the following in writing to the resident at the completion	Yes	Policy & procedure	

	of stage 2 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 the Ombudsman Service if the individual remains dissatisfied. 		Letter templates set this out Staff training Sample checks to review letters and responses include this information	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Procedure	all Stage 2 responses are reviewed and signed off by Director

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; 	Yes	Policy & procedure Website 'Set out under remedy types & responding to complaints in full' Housing Ombudsman determinations – all relevant colleagues involved in the	

	<ul style="list-style-type: none"> • Providing an explanation, assistance or reasons; • 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. 		complaint meet to review the outcome & lessons learnt. Agree who is responsible for carrying out any actions.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Procedure – remedy types & responding to a complaint in full sections</p> <p>Follow compensation policy for any financial redress</p>	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is set out under 'remedy types' within our procedure. Our complaint letter response templates set out what to include.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Spotlight reports circulated to relevant teams and shared via Housing Local brief	Discuss adding complaints to team meeting agendas to share lessons learnt

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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. 	Yes	<p>Website</p> <p>Provided report on Ombudsman complaints & outcomes</p> <p>Complaints performance</p>	<p>Annual complaints report created</p> <p>Published the self-assessment & action plan on website</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.	Yes	MRC will provide response on behalf of TACT board as agreed at April meeting	TACT Board minutes April 2025
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	No requirement to do this in this reporting year	
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	Complaints procedure	

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	Lessons learnt log Housing Ombudsman investigations Ensure quarterly complaints analysis & trends is shared with	Lessons learnt log Analysis & trends of complaints report to TACT Board Complaints focus group will review case studies to look at trends and learning from complaints
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	Team meetings Tenancy services review Staff complaints training	Contractor performance meetings – complaints discussed
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	Local brief Performance	TACT Board-quarterly updates Resident engagement work around barriers to making a complaint
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must			Quarterly complaints performance being developed & reporting more

	assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	CHOS & Housing Policy & Projects Manager are accountable	to TACT board and DMT around some theme analysis
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	MRC – new Portfolio holder confirmed as MRC	TACT board minutes
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Portfolio Holder is MRC	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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 	Yes	Do report number of HOS cases- need to develop more detailed reporting and outcomes for TACT board on HOS complaints	Further reporting around HOS determinations and progress against these to be produced for MRC and Tact Board from Q2 2025

	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	Standardised objective agreed for all housing colleagues	

