

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 complaints 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.

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	EFDC Customer Complaint Policy <i>Available via EFDC website</i>	EFDC Customer Complaint Policy clearly defines a complaint as per the Handling Code definition. This is mentioned at the beginning of the Policy Document.
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	EFDC Customer Complaint Policy	Section 2 of EFDC’s Complaint Policy (“The Policy”) states the issues the complaints policy can address (not just when the word “complaint” is used). Section 4 Section states that if a complaint is being registered by a third party, we require consent to discuss this matter with the named individual or organisation.
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	EFDC Customer Complaint Policy	Section 1 of The Policy outlines issues the complaints process cannot address which includes the initial report of problem or a request for service.
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	EFDC Customer Complaint Policy	1.1 Section 1 of The Policy states, <i>“If you have previously reported a problem but feel that the appropriate action has not been taken, then you can raise this as a complaint.”</i> This complaint goes on to follow the formal complaint process with the Complaints Team ensuring the initial

				service request is addressed and also forms part of the written outcome response.
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	EFDC Customer Complaint Policy	<p>Survey responses and other general comments received that meet the criteria of a formal complaint are passed on to the Complaints Team.</p> <p>Section 4 of The Policy states that complaints can be submitted via various routes.</p>

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	EFDC Customer Complaint Policy	As part of the initial validation process the Complaints Team will assess if the complaint meets the definition. If not accepted, a clear reason is given, and appropriate signposting given. Section 1 of The Policy outlines issues the complaints process cannot address.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> 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. 	No	EFDC Customer Complaint Policy	Section 1 of The Policy outlines issues the complaints process cannot address. Other exclusions included are: <ul style="list-style-type: none"> Freedom of information & Subject Access Requests within the body of a complaint. Matters outside this Council's jurisdiction. Matters which must be investigated for the purposes of an insurance claim. Duplicate complaints Insurance related matters
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.	Yes	EFDC Customer Complaint Policy	Section 4 of The Policy gives details of the 12-month timeframe. The Complaints Team

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			along with the appropriate Service Area, will assess on an individual basis, complaints over 12 months, and whether there is good reason to accept complaints outside this timeframe.
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	Our Validation Templates are used to keep responses clear and consistent <i>Internal Document</i> 2024/25 - 60% (861) of initial complaints received were not treated as complaints.	As part of the initial validation process, the Complaints Team will assess if the complaint meets the definition. If not accepted, a clear reason is given, and appropriate signposting given. The response also includes referral rights to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	EFDC Customer Complaint Policy	Section 4 of The Policy gives details of the 12-month timeframe. The Complaints Team along with the appropriate Service Area, will assess on an individual basis, complaints where it's required to do so.

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	EFDC Customer Complaint Policy The online complaint submission form asks if there are any accessibility or reasonable adjustments under the Equality Act 2010 we need to consider. We have made adjustments such as: <ul style="list-style-type: none"> • Printing on coloured paper • Pre-agreed times when to callback to meet the resident's needs. 	We have now included this question so that we can know from the outset what (if any) adjustments need to be made.
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	EFDC Customer Complaint Policy Face to Face Complaints Workshops	Employees are also aware that if they are not certain if what has been reported to them is a complaint that they should contact the Complaints Team.
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 Complaints Handling Training & Service Review Meetings are used to communicate that complaints are like "The Canary In The Coal Mine"...good means of process / service health check	"How to complain" in other correspondence shared with residents such as Tenants Magazines & letters.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	EFDC Customer Complaint Policy	The Policy is reviewed annually or whenever there is significant change (whichever is sooner).
3.5	The policy must explain how the landlord will publicise details of the complaints policy,	Yes	EFDC Customer Complaint Policy	Wording has been added to make it clear that complaints are handled in line with The Code.

	including information about the Ombudsman and this 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	EFDC Customer Complaint Policy	Wording has been added to The Policy to make residents aware that consent is required.
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	EFDC Customer Complaint Policy	Ombudsman information given at the acknowledge stage of the process.

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	The EFDC Complaints Team consists of: <ul style="list-style-type: none"> Team Manager – CSAT & Complaints Complaints Officer 	The Complaints Officer role is 100% focused on complaint handling. The Team Manager supports the Complaints Officer whilst undertaking other roles and responsibilities.
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	Meetings are arranged between the Complaints Team and the Investigating Officer for complex cases. Act as a liaison on Ombudsman cases with Investigating Officers/Service Areas.	The Complaints Team has access to all staff at all levels through internal systems.
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	Complaints KPI 100%. Forms part of the corporate KPI reporting to Executive Leadership & Cabinet Members.	The Complaints KPI, 100% responded to within the agreed SLA is monitored and shared regularly with the Service Director for Customer and the MRC (Member Responsible for Complaints).

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	EFDC Customer Complaint Policy	If a resident has expressed they are not happy with the service they have received, EFDC makes them aware they can complain. It is not seen as a negative.
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	EFDC Customer Complaint Policy	The Policy clearly states we operate a 2-stage policy for formal complaints. Once all stages are exhausted the Ombudsman service is available.
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	EFDC Customer Complaint Policy	As above
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	EFDC Customer Complaint Policy EFDC processed 578 formal Complaints for the fiscal year 2023/24. 53% related to Contractors.	Section 2 highlights the complaints process can address complaints relating to contractors. The Council process complaints relating to two of our main contractors for Repairs & Waste.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Qualis Property Solutions abides by EFDC's Customer Complaints Policy, their SLAs mirror EFDC's SLAs and they use EFDC approved complaint response templates.	All waste related complaints are responded to by EFDC's Waste Team. Stage 1 & 2 repairs related complaints are responded to by Qualis Property Solutions with The Council regularly reviewing open cases. Quarterly Review meetings take place to discuss outcomes & any lessons learnt.

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	EFDC acknowledgements are system generated immediately after the validation/triage stage. This also gives times of when to expect the response.	This is standard practice.
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	At the validation/triage stage, the Complaints Team will acknowledge what parts are not complaints or needs clarity.	This is standard practice
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	EFDC Customer Complaint Policy	Outcome responses comply with this section of the code.
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	EFDC Customer Complaint Policy	If additional time is required at least 48hrs before the due date the investigating manager will contact the resident regarding the extension of time.
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	EFDC Customer Complaint Policy The online complaint submission form asks if there are any accessibility or reasonable adjustments under the Equality Act 2010 we need to consider.	We have now included this question so that we can know from the outset what (if any) adjustments need to be made.

			<p>We have made adjustments such as:</p> <ul style="list-style-type: none"> • Printing on coloured paper • Pre-agreed times when to callback to meet the resident's needs. 	
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	EFDC Customer Complaint Policy	As per responses in Section 2 of this Assessment.
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	<ul style="list-style-type: none"> • EFDC Secure Drive • Complaints Dashboard <p>Our record keeping has allowed us to meet information gathering requirements when requested by the Ombudsman.</p>	<p>The Complaints Dashboard is used to manage the workflow of the complaint, issue notifications, reminders, upload the responses and close when resolved.</p> <p>The secure drive is used to store all correspondence and supporting evidence received.</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.	Yes	5% of Complaints for 2024/25 were Withdrawn.	Investigating officers are able to remedy the complaint at any stage and are expected to still conclude the formal complaints process unless the resident requests to withdraw from the formal process.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	EFDC Customer Complaint Policy & Unacceptable Customer Behaviour Policy	<p>Section 5 of The Policy refers to Unacceptable behaviour during the complaint process & highlights that restrictions can be applied.</p> <p>Residents placed under any restrictions have an agreed review date set to ascertain</p>

				whether the restriction can be removed or if it needs to remain.
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	EFDC Customer Complaint Policy	Section 5 of The Policy outlines that the Equality Act 2010 will be considered & The Right to Appeal.

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	EFDC Customer Complaint Policy	Complaints are validated/triaged on receipt. If the complaint is considered complex the Complaints Team will work with the investigator regarding a time extension and liaising with the resident.
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	EFDC Customer Complaint Policy	Confirmation of receipt of a complaint is issued immediately once uploaded to the complaints dashboard. The complaint is validated/triaged and assigned to the investigating officer within 5 working days. Once assigned and automated response detailing full information of the complaint and the date the complaint is due is sent to the resident and the investigating officer.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	EFDC Customer Complaint Policy Complaints KPI Target – 100% of complaints responded within the appropriate time frame. <i>(Stage 1 10 working days / Stage 2 20 working days)</i>	Investigating officers upload their responses to the Complaints Dashboard and mark the complaint as Response Issued & add the date the response was issued by way of timestamping when the response was issued.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the	Yes	EFDC Customer Complaint Policy	If additional time is required at least 48hrs before the due date the investigating officer will

	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.			contact the resident regarding the extension of time and give clear reasons as to why.
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	Extension of time template (Holding Letter) <i>Internal Document</i>	The template has both Ombudsmen contact 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 the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Outcome response templates refer to this section of the code should residents request to leave the complaint open. <i>Internal Document</i>	The Complaints Team regularly review open complaints especially around repairs to ensure complaints are not left open in line with completion of works.
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	Stage 1 & Stage 2 template letters <i>Internal Documents</i>	Stage 1 & Stage 2 template letters have a framework for investigating officers to follow. The Complaints Team also completes a random sample of letters by way of compliance to ensure responses are adequate.
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	EFDC Customer Complaint Policy	Section 4 "How to make a complaint" advises what will happen if additional or new information is provided.

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	Stage 1 template letter <i>Internal Document</i>	Letter templates used by Investigating Officers ensure compliance with this section of the code.
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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	Stage 1 response letter (NOT UPHELD) <i>Internal Document</i> EFDC Customer Complaint Policy	Stage 1 Response Letter gives instruction on how to progress to Stage 2. The Policy in Section 4 outlines how to progress to Stage 2.
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	EFDC Customer Complaint Policy	Confirmation of receipt of a complaint is issued immediately once upload to the complaints dashboard. The complaint is validated/triaged and assigned to the investigator officer within 5 working days. Once assigned and automated response detailing full information of the complaint and the date the complaint is due is sent to the resident and the investigating officer.

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	EFDC Customer Complaint Policy	The Policy in Section 4 outlines how to progress to Stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	EFDC Customer Complaint Policy	This is usually a Senior Officer within the Service Area.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	EFDC Customer Complaint Policy	The Complaints Team monitors response due dates.
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	EFDC Customer Complaint Policy	If additional time is required at least 48hrs before the due date the investigating manager will contact the resident regarding the extension of time and give clear reasons as to why.
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	Extension of Time template	The template has both Ombudsmen contact details.
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	Outcome response templates refer to this section of the code should residents request to leave the complaint open. Stage 1 & 2 UPHELD templates <i>Internal Documents</i>	The Complaints Team regularly reviews open complaints especially around repairs to ensure complaints are not left open in line with completion of works.
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	EFDC Customer Complaint Policy	Section 4 "How to make a complaint" advises what will happen if additional or new information is provided.

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; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Stage 2 template letter <i>Internal Document</i>	Letter templates used by Investigating Officers ensure compliance with this section of the code.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	EFDC Customer Complaints Policy	The Policy states in Section 4 that a Senior Officer will investigate the Stage 2. There is usually a Senior Officer within the Service Area who will link in with all staff and services necessary.

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: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay;	Yes	Stage 1 & Stage 2 UPHELD templates <i>Internal Document</i>	Acknowledgement and remedial actions form part of the Outcome Response at all stages.

	<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	17% (89) of Stage 1 complaints escalated to Stage 2 due to unsatisfactory response or remedy for 2024/25 <i>(565 total formal Stage 1 complaints and 89 Stage 2 complaints investigated 2024/25)</i>	To offer the appropriate remedy, the Investigating Officers will assess the nature of the complaint and the impact to the resident, this could be emotionally, financially, etc.
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	Stage 1, Stage 2 UPHELD Letter <i>Internal Document</i>	Upheld templates are structured so that remedies and next steps can be clearly articulated in the response.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Ombudsman Apology Letter <i>Internal Document</i>	This letter is issued following an Ombudsman Final Decision. This gives a structure for apologising and any other remedial actions or reparation.

Section 8: Self-assessment, reporting and compliance

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: 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	Annual Complaints Report 2024/25 <i>Available via EFDC website</i>	The Annual Complaints Report along with this Self-Assessment is; <ul style="list-style-type: none"> Presented for challenge/scrutiny to Director of Customer and the MRC It is circulated to elected members of the District Council Posted on our Website
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	As Above	The Annual Complaints Report along with this Self-Assessment is; <ul style="list-style-type: none"> Presented for challenge/scrutiny to Director of Customer and the MRC It is circulated to elected members of the District Council. Posted on our Website

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaint Handling Code Self-Assessment 2024/25 <i>Available via EFDC website</i>	The Complaints Team Manager diarised to review 6 monthly or following significant changes – whichever occurs sooner.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If a request is received, we will comply with this section.	If a request is received, we will comply with this section.
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	EFDC Business Continuity Plan (BCP) <i>(Internal Document Only)</i>	The Ombudsman will be contacted should disruption to service prevent EFDC meeting response timescales. EFDC's BCP will have instructions for The Complaints Manager to follow.

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	Quarterly Service Review meetings held with Heads of Service and Manager.	These meetings are used to discuss SLA adherence as well as opportunities for service improvements.
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	The Complaints Handling Training & Service Review Meetings are used to communicate that complaints are like "The Canary In The Coal Mine"...good means of process / service delivery health check.	Online knowledge check used to validate training attendees learning. Introducing annual Online refresher for those who already attended the training.
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	Complaints Performance reported back to the Councils Overview & Scrutiny Committee, the MRC and Senior Leadership Team Quarterly.	Report details volumes received, any trends around causes, improvements and agreed next steps.
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	The Director for Customer who forms part of the EFDC Senior Leadership Team is the appointed person.	Report details volumes received, any trends around causes, improvements and agreed next steps.
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	The MRC appointed is overall Directorate Portfolio Holder who is also a member of the Local Authorities Cabinet.	Report details volumes received, any trends around causes, improvements and agreed next steps.
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.	Yes	There are scheduled meetings with the Service Director & MRC	Where required the MRC can meet with the wider Complaints Team.

	This person must have access to suitable information and staff to perform this role and report on their findings.			
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <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 progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>A-C form part of the quarterly reporting back to Director and MRC.</p> <p>D – meeting with Director and MRC before publishing.</p>	<p>Before Annual Reports are published on the website, it is shared with other elected members via the appropriate channels.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> 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	Multi-Service Complaint Tracker	<p>Complaints that span more than one service area are tracked and monitored by the Complaints Team ensuring there is a collaborative approach and one comprehensive response.</p>