

## 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	<p>A complaint must be defined as:</p> <p><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></p>	YES	<p><a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a></p>	<p>According to our Housing Management Complaints Policy, a complaint is defined as an expression of dissatisfaction related to the standard of service, actions, or lack of action by the Council, its staff, or those acting on its behalf. This dissatisfaction can affect an individual resident or a group of residents. It's important to note that a first-time request for information, advice, or action would not typically be classified as a complaint, except in exceptional circumstances (which are assessed on a case-by-case basis). However, a complaint may arise if a service request remains unaddressed or if the action taken is delayed or falls below acceptable standards.</p>
1.3	<p>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		<p>According to our Housing Management Complaints Policy, residents do not need to explicitly use the term "complaint" for their concerns to be treated as such. The policy specifies that the complaints process is accessible to any individual or organisation receiving a Housing</p>

				Management service from the Council or feeling adversely affected by it.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	<p>As a responsible landlord, we distinguish between service requests and complaints. Following the Housing Ombudsman's definition, we treat the initial reporting of a fault as a service request. Our priority is to resolve the issue promptly outside of the formal complaints procedure. This approach is clearly outlined in our Comments, Compliments, and Complaints procedure, specifically in section <b>3.2 titled 'What is a complaint?'</b>. According to this section, a complaint may arise if a service request remains unaddressed or if the action taken is delayed or falls below acceptable standards. A first-time request for information, advice, or action would not typically be classified as a complaint, except in exceptional circumstances (to be assessed on a case-by-case basis).</p> <p>However, a complaint may arise if a service request remains unaddressed or if the action is delayed or carried out to an unacceptable standard.</p>

				<p><a href="#">All service requests are meticulously logged and recorded in our system (360 Dynamics)</a></p>
1.5	<p>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>	Yes	<p><a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a></p>	<p>Customers are informed that, while their service requests are being logged, they have the option to raise a complaint at any time. Throughout the process, we periodically remind them of this option and provide relevant information. According to Section 4.4 of our Complaints policy:</p> <ul style="list-style-type: none"> <li>• If a problem can be resolved within two working days by agreeing on a plan that satisfies the complainant, and the complainant concurs with this approach, the formal complaints process will not be initiated.</li> <li>• Each service area is responsible for responding to and managing their own cases within the two-working-day timeframe.</li> <li>• If the problem cannot be swiftly resolved, if formal investigation is necessary, or if the complainant</li> </ul>

				expresses a desire for the matter to be considered under the formal complaints process, the complaint will be referred to the relevant service for a Stage 1 investigation. <a href="#">In such cases, the Stage 1 target of 10 working days will commence from the original complaint date</a>
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.	Part	<a href="#">Housing Needs Customer Satisfaction Survey - Kensington and Chelsea's Consultation and Engagement Hub - Citizen Space (rbkc.gov.uk)</a>	We conduct complaint satisfaction surveys after the complaint process. Recognising the importance of proactive complaints handling, our recent Housing Needs Customer Satisfaction Survey (which closed on June 2, 2024) involves following up on negative feedback. We're implementing measures to address concerns before they escalate into formal complaints. Going forwards, all teams in Housing Management have been asked to include a link to the complaints process in all future types of surveys that go out to residents

## 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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	<p>The exclusions in the RBKC housing management complaints policy mirror the exclusions in section 2 of the complaint handling code, as follows.</p> <ul style="list-style-type: none"> <li>• Complaints related to potential data breaches.</li> <li>• Matters that have already been heard by a Court, tribunal, or any Council review panel.</li> <li>• Cases where the customer or the Council has initiated legal proceedings or taken court action.</li> <li>• Complaints involving insurance claims against the Council. However, some aspects falling within this policy may include allegations that the Council delayed providing information on how to make an insurance claim.</li> </ul>

				<ul style="list-style-type: none"><li>• Serious complaints about Council officers, which are more appropriately addressed through the Council's disciplinary code, staff management, or performance procedures (e.g., allegations of serious misconduct such as fraud).</li><li>• Complaints from staff members concerning personnel matters.</li><li>• Allegations of fraud or corruption, which should be handled under the Council's anti-fraud or whistleblowing procedures.</li><li>• Complaints about councillors, as these are subject to separate procedures.</li><li>• Concerns related to Council policies.</li><li>• Criminal actions.</li><li>• Complaints about the behaviour of other Council tenants, which are addressed by housing officers or area managers.</li><li>• Disputes over commercial contracts</li></ul>
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				<p>involving private landlords and the Council.</p> <ul style="list-style-type: none"><li>• If a complainant refuses to engage with the Council or the complaints process and behaves abusively or unreasonably.</li><li>• The Council reserves the right to refuse to handle complaints or address them differently if they are pursued unreasonably or could be more effectively managed through an alternative approach.</li></ul> <p>Additionally, separate procedures are in place for handling complaints related to the following services:</p> <ul style="list-style-type: none"><li>• Social Services</li><li>• Schools</li><li>• Parking Matters</li><li>• Planning Applications</li><li>• Housing/Council Tax Benefits</li></ul> <p>If you are dissatisfied with a decision regarding these services, the notification letter explaining the decision should</p>
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				<p>provide guidance on how to file a complaint.</p> <p>For waste collection complaints, please contact Streetline at 020 7361 3001 or email <a href="mailto:streetline@rbkc.gov.uk">streetline@rbkc.gov.uk</a>.</p> <p>Regarding sports centers, initially reach out to the General Manager at Chelsea Sports Centre. If an unsatisfactory response is received, escalate the matter to the GLL Partnership Manager based at Head Office, Middlegate House, The Royal Arsenal, Woolwich, London SE18 6SX. <a href="#">Alternatively, you can contact the customer services line on 020 3457 8700 or email <a href="mailto:customerservices@gll.org">customerservices@gll.org</a></a></p>
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> </ul>	Yes	<p><a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a></p>	<p>In line with the complaints handling code, which states it is acceptable to exclude issues that occurred over 12 months prior, sections 4.3 of our complaints policy says that. However, each case will be assessed individually, and discretion will be exercised when considering complaints beyond this timeframe.</p>

	<ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This has also been evidenced on 2.1
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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Where the Council applies one of the exemptions contained with the handling code, and set out within our complaints policy, the reasons for the decision are included in the acknowledgement response, and the customer is advised on the next steps
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This information is outlined within our Comments, Compliments, and Complaints procedure, specifically in the section titled 'Complaints falling outside of the Housing Management.

### 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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a> under the heading "Before you make a formal complaint"	<p>Within our Comments, Compliments, and Complaints procedure, under the section titled 'Equality, Diversity, and Inclusion,' we affirm that all complaints will be handled in accordance with the Council's commitment to promoting equality, diversity, and inclusion. This commitment extends to individuals regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sex or sexual orientation. To fulfil this commitment, the Council ensures that information is accessible and available in appropriate formats, including interpretation and translation services, large print, and audio formats.</p> <p>On our website, we provide guidance to customers on various ways to contact the council for making a complaint. Specifically, under the section 'Before you make a formal complaint,' we emphasise that many issues can be promptly resolved by directly</p>

				contacting the relevant officer or service. Customers have the option to engage face-to-face, via telephone, email, or by using our online 'contact us' form.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a> under the heading "Before you make a formal complaint"	This information is outlined within our Comments, Compliments, and Complaints procedure, specifically in the section titled <b>'Before you make a formal complaint'</b>
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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Entering the term 'complaint' in the search bar on the Royal Borough of Kensington and Chelsea website directs residents to the relevant webpage containing information about complaints.
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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This information is outlined within our Comments, Compliments, and Complaints procedure. The procedure specifies the number of stages involved, details the actions at each stage, and provides timeframes for each stage.
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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This information is outlined within our Comments, Compliments, and Complaints procedure.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Residents have the option to appoint a representative to handle their complaint or accompany them during any meetings

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		In both Stage 1 and Stage 2 written responses to residents, we provide contact information for the Housing Ombudsman. This practice is outlined within our Comments, Compliments, and Complaints procedure, specifically in Section 10, which details the Council's approach to handling complaints related to its Housing Management function.
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## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		<p>The council maintains a corporate complaints team responsible for overseeing the handling of all complaints received. This team ensures compliance with the Ombudsman Complaints Handling codes.</p> <p>Additionally, the council has a dedicated Customer Experience Team responsible for managing all Housing Management and Housing Needs Complaints.</p> <p>A Customer Experience Manager ensures that both the Housing Management and Housing Needs teams adhere to the codes and treat complaints seriously. Furthermore, the manager facilitates relevant training on complaints handling.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes		<p>Our Customer Experience Officer proactively engages with the complainant and the investigating officer upon logging the complaint, aiming to gain a comprehensive understanding of the issue and work toward a fair and balanced resolution. Additionally, the officer consults the Housing Ombudsman at this stage and assesses</p>

				whether any reasonable adjustments are necessary.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes		<p>Staff members responsible for managing complaints possess the necessary skills, experience, and training. Upon logging a complaint, Customer Experience officers proactively engage with the complainant to gain a comprehensive understanding of the issue and work toward a fair and balanced resolution. Additionally, these officers consult the Housing Ombudsman as part of the process and assess whether any reasonable adjustments are required.</p> <p>RBKCs Housing Management Department, in its capacity as a social landlord, has established mechanisms. The Council has established mechanisms to utilise feedback from complaints for service improvement. Users of the complaints process may participate in surveys to express their views on the handling and outcome of their complaints, allowing the Council to monitor customer satisfaction and identify areas for enhancement.</p>

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	The Council has a single complaints policy, which covers all complaints that fall within the jurisdiction of the code.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	We make every effort to promptly address complaints, taking into account the case's complexity. Urgent issues are handled promptly, if needed, before sending out the complaint response.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Our process consists of two stages, as outlined in our Comments, Compliments, and Complaints procedure. You can find detailed information in section 3.3 of our complaints procedure under the heading <b>'Accessing the complaints process'</b>
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.			All complaints even those about contractors are handled by the council. The council does not outsource the responsibility to those outside of our organisation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.			All complaints even those about contractors are handled by the council. The council does not outsource the responsibility to those outside of our organisation

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		We initiate contact using the complainant’s preferred communication methods and promptly send an acknowledgment letter that includes clarification regarding their Stage 2 complaint
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		Written acknowledgments include a concise summary of the issues raised by the complainant and the desired outcomes. Additionally, the initial contact between the Complaint Officer and the tenant serves to confirm the position
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes		Customer Experience Officers diligently ensure that all complainants receive unbiased treatment during initial contact. Additionally, the complex case investigating officer proactively engages with the complainant to clarify the nature of the complaint. This involves a thorough examination of all information provided by the resident. Furthermore, the Customer Experience officer conducts an internal audit of the response to verify the accuracy of the situation. Our approach remains impartial, treating each complaint on its individual merits
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		The Customer Experience Officer initiates communication with the complainant to discuss the possibility of an extension. Upon mutual agreement, this arrangement is formally confirmed in writing.

				Additionally, we engage with the customer to determine their preferred communication frequency and methods
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		In accordance with the Ombudsman's recent guidance on vulnerability, The Council has agreed a number of reasonable adjustments for complainants having a specific vulnerability and/or disability. These adjustments, and the associated vulnerability / disability that gave rise to it, are recorded on our main records system (CRM), and are subject to periodic review by our Neighbourhoods and Health & safety Teams. We also continue to update our systems on a day-to-day basis whenever new information comes to our attention regarding a resident's specific disability / vulnerability
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	When a complaint is not upheld, we provide clear explanations to the customer regarding the decision-making process. Additionally, we offer them the opportunity to appeal, engage in further discussion, or approach the Housing Ombudsman as part of our complaint response letter. Furthermore, our Comments, Compliments, and Complaints procedure outlines specific circumstances where we may

				reasonably decline to escalate a complaint.
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		We have established a comprehensive complaints system (referred to as 'icase') specifically designed for managing landlord complaints. This system maintains a transparent audit trail of all interactions between the complainant and the landlord. Additionally, we log all service requests and members' inquiries on a dedicated platform called Microsoft Dynamics 360. Importantly, our complaints system adheres strictly to the required two-stage process, without any additional stages.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	The council places significant importance on addressing complaints promptly and achieving timely resolutions at any stage. We acknowledge instances of shortcomings and carefully manage complainants' expectations in alignment with our capabilities. Our range of remedies includes issuing apologies, providing compensation, making ex-gratia payments, or offering gestures such as charitable contributions. These principles are outlined in our online Comments, Compliments, and Complaints procedure. Specifically, if the complaints process reveals that a fault by the Council has directly caused personal injustice, we strive to offer a proportionate and

				reasonable remedy based on the circumstances. This may involve issuing apologies, reviewing processes and procedures, or compensating for financial losses resulting directly from the Council's actions. Additionally, we take into account quantifiable losses experienced by the complainant, including the time and effort invested in making the complaint. Statutory payments, such as Home Loss or Right to Repair, are also considered.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a> <a href="https://www.rbkc.gov.uk/media/document/housing-management-unreasonable-complainants-policy">https://www.rbkc.gov.uk/media/document/housing-management-unreasonable-complainants-policy</a>	This falls under our Unreasonable Complaints policy. If it becomes necessary to limit communication with a resident, we will consider the provisions outlined in the Equality Act 2010, our Equality Duty, and the protected characteristics of the resident. Reasonable adjustments will also be taken into account. In addition, any restrictions imposed under this policy are subject to review every 3 months, and are also subject to a formal appeals process.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This falls under our Unreasonable Complaints policy which is currently being reviewed as it was due for review in February 2024. If it becomes necessary to limit communication with a resident, we will consider the provisions outlined in the Equality Act 2010, our Equality Duty, and the protected characteristics of the resident. Reasonable adjustments will also be taken into account.



## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes		We diligently strive to address complaints promptly, taking into account the case's complexity. Urgent matters are handled promptly, if required, before issuing the complaint response. Our Customer Experience team efficiently communicates with customers to resolve less complex cases. Initiating contact with the customer also allows us to identify any vulnerabilities, if not already flagged in the system.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes		The council adheres to rigorous internal guidelines for logging and acknowledging complaints. Within three working days, written acknowledgments are provided, including a summary of the issues raised by the complainant and the desired outcomes. Additionally, the initial contact between the investigating officer and the tenant serves to confirm the position.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	This provision is outlined in our Comments, Compliments, and Complaints procedure, specifically in Section 3.3 titled 'Accessing the complaints process.'
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		The Customer Experience Officer initiates communication with the complainant to discuss the possibility

	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.			of an extension. Upon mutual agreement, this arrangement is formally confirmed in writing.
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		In the event of an extension, the Customer Experience Officer also furnishes the complainant with the Housing Ombudsman's contact information. Furthermore, our written response includes details about the Housing Ombudsman.
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		We send written complaint responses to residents once we have determined the answer to their complaint. If there are any outstanding actions, we include them in the written response along with target dates. Our complex case officer logs these outstanding actions and ensures they are tracked to completion by collaborating with the relevant service area.
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		As a landlord, our complaint responses thoroughly address all points raised and provide clear reasons for our decisions. Additionally, during the process of investigating a live complaint, customers can raise multiple related requests.
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	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	In our complaint acknowledgement to the customer, they are advised that if there is any further evidence or information they wish to provide, they should submit it. This will be considered as part of the complaint investigation.

	would unreasonably delay the response, the new issues must be logged as a new complaint.			
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes		We have implemented the Housing Ombudsman's standardised response letters, ensuring compliance with the specified requirements.

## 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	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	If the complainant remains dissatisfied with the initial response, they have the option to escalate the complaint to the second and final stage.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Written acknowledgments are provided within five working days and include a summary of the escalated issues and the outcomes sought by the resident. Additionally, ongoing communication between the

				investigating officer and the tenant serves to confirm the situation.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Our Stage 1 letter response does not necessitate the complainant to provide reasons for requesting a Stage 2 review. Instead, it informs them that if they are dissatisfied with the Stage 1 response, they should notify us within 20 working days. The Director of Housing Management will then conduct a thorough review of their case and the initial response, aiming to provide a comprehensive reply within 20 working days unless an alternative timeframe is mutually agreed upon.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes		Stage 2 responses come from the Director of Housing Management, whereas Stage 1 responses are signed off by a lower-level manager such as a head of service or assistance director.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	Yes		Our stage 2 complaints are addressed within 20 working days. While we strive to provide timely responses following a thorough investigation by the Head of Service, there may be exceptional circumstances where we cannot meet this timeframe. In such cases, we will promptly inform the resident, providing a clear explanation and an alternative timeframe

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		The Customer Experience Officer initiates communication with the complainant to discuss the possibility of an extension. If an agreement is reached, it is then formally confirmed in writing.
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		When an extension is granted, the Customer Experience Officer also furnishes the complainant with the details of the Housing Ombudsman.
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		Written complaint responses are sent to the resident when the answer to complaint is known. Where there are any outstanding actions, these are listed within the written response with target dates. The investigating Officer logs any outstanding actions and tracks these to completion by working with the relevant service area
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		As a landlord, our responses to complaints address all points raised and provide clear reasons for the decisions made. We have adopted the Housing Ombudsman's template response letters, ensuring compliance with the requirements. Additionally, we provide details to residents on how they can escalate the matter to the Housing Ombudsman.

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes		We can confirm that all of these are included in the standard S2 template wording.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback">https://www.rbkc.gov.uk/housing/get-involved-and-feedback/housing-management-complaints-and-feedback</a>	Our Comments, Compliments, and Complaints procedure outlines how we handle complaints. At the stage 2 level, responses are provided by a Head of Service.

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes		<p>The Royal Borough of Kensington and Chelsea (rbkc.gov.uk) Council's complaints procedure is designed to effectively resolve disputes by identifying issues and implementing corrective actions. The investigating officer manages the next steps and outcomes until the complaint is fully resolved. Relevant service areas make necessary improvements based on feedback. This approach is outlined in our Comments, Compliments, and Complaints procedure (Section 17), which emphasises the importance of using complaints information to enhance services for our customers. Additionally, users of the complaints process may be surveyed to assess satisfaction and identify areas for improvement. Compensation is awarded in cases of service failure, following our compensation policy. Significant changes resulting from complaints feedback are incorporated into our policy during the next review.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes		<p>We acknowledge and address any failings, managing complainants' expectations in alignment with our capacity to deliver. Remedies may include apologies, compensation, ex-gratia payments, or gestures such as charitable contributions. The specific remedies agreed upon will be assessed on a case-by-case basis, in line with the broader</p>

				framework set out within our Compensation & Redress Policy, taking into account the complainant's individual circumstances and any specific vulnerabilities they may have.
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		Following the conclusion of the investigation, appropriate remedies are identified in agreement with the complainant. Proposed remedies are then monitored until completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		As good practice we refer to the Housing Ombudsman guidance when deciding on appropriate remedies.

## 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p><a href="https://www.rbkc.gov.uk/complaints">Complaints, comments and compliments   Royal Borough of Kensington and Chelsea (rbkc.gov.uk)</a></p>	<p>As outlined in our Comments, Compliments, and Complaints procedure (Section 18), the Council has a responsibility to report on its complaints processes. We carry out a yearly Tenants Satisfaction Measures. This reporting aims to monitor usage, assess service user satisfaction, and utilise received complaints for service improvement. The latest report is due to be published on 30th June 2024. Additionally, performance against targets and trends is reported to the Senior Management Team within Housing Management to ensure accountability for service delivery. The policy undergoes review every three years or sooner to incorporate legislative or regulatory changes, best practice updates, and address any operational issues identified with the process.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent)</p>	Yes	<p><a href="#">Royal Borough of Kensington and Chelsea   Agenda for Overview &amp; Scrutiny Committee on Wednesday,</a></p>	<p>The Annual Complaints Report for 2023-24 includes all the necessary elements published on</p>

	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.		<a href="#">15th November, 2023, 6.30 pm (moderngov.co.uk)</a> Leadership Team: <a href="#">Royal Borough of Kensington and Chelsea   Agenda for Leadership Team on Wednesday, 6th December, 2023, 6.30 pm (moderngov.co.uk)</a>	both the Committee pages of the Council's website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		As a landlord, we are committed to conducting a detailed annual self-assessment against the code to ensure our complaint handling remains in line with the requirements.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		As a landlord, we are committed to conducting a review and updating our self-assessment if requested by the Ombudsman in future.
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		In the event that we are unable to comply with the Code, we are committed to informing the Ombudsman and the affected complainants. We will also publish this information on our website, along with appropriate timescales for service reconvening.

**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		We thoroughly consider the impact of complaints beyond individual circumstances and assess how they affect all residents. We have conducted appreciative inquiries and customer journey mapping in some of our estates where complaints have been raised, leading to the identification of service failings.
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		As a landlord, we acknowledge the constructive influence of complaints on future service delivery, which is reinforced through the investigative process. We have conducted appreciative inquiries and customer journey mapping in specific areas, such as delayed repairs, where complaints have been raised.
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		Our Annual Complaints Report for 2022/23 provides an overview of the Council's performance regarding complaints, along with a summary of findings. Although the annual report for 2024/25 is pending publication, it will cover the learning and improvements from the previous year, which will be

				publicised on the Council's website. This will provide the necessary assurance to meet element 9.3.
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		Customer Experience Specialist produces a bi-annual lessons learned from complaints report, which is distributed to senior management. Both the Customer Experience Manager and the Customer Experience Specialist responsible for the landlord function are accountable for handling Housing Management complaints. Additionally, they assess themes and trends to identify potential system issues. At the Executive level, the Lead Member for Housing oversees complaints for the entire Council.
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 Lead Member for Housing has the overall responsibility for complaint handling across the whole Council, not just the landlord function.
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		An elected Cabinet member holds overall responsibility for complaint handling across the entire Council, including beyond the landlord

	This person must have access to suitable information and staff to perform this role and report on their findings.			function. The Lead Member for Housing in her role as MRC, along with the rest of the Council's Leadership Team, receives regular reports on complaints performance.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes		The Cabinet member, as an elected official, holds overall responsibility for complaint handling throughout the entire Council. They oversee the Council's performance in managing complaints, including monitoring complaint volumes, categories, and outcomes. Additionally, they ensure timely notification of any instances of maladministration or severe maladministration. Their role also involves ensuring compliance with Ombudsman orders and recommendations to drive service improvement
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		As a landlord, we foster collaborative relationships with other services. This is facilitated by our Head of Customer Experience and Customer Experience Manager, who ensure positive cooperation across teams and service areas

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