

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	Complaints Policy, Section 2 Definition of a Complaint, Paragraph 2.2 - Complaints Process	The Council in July 2024 adopted the Housing Ombudsman specified wording for Housing Complaints and the Local Government and Social Care Ombudsman wording for non-housing complaints. This is also stated on our website - Make a complaint - Dover District Council
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy, Section 2 Definition of a Complaint, Paragraph 2.3 - Complaints Process "A resident/individual does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative will still be handled in line with the Council's Complaints Policy."	There is no requirement in our current policy for the word complaint to be used for a matter to be treated as such. This is also made clear to officers of the council as part of our internal complaint guidance.
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	Yes	Complaints Policy, Section 1 Definition of a Service Request - Complaints Process	The Council's Complaint Policy was updated in July 2024 to use the definition of

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		The Council's complaints system records Service Requests as well as Stage 1 and Stage 2 complaints and the figures for service requests are reported to the Governing Body (the Cabinet) on a quarterly basis.	a service request used by the Housing Ombudsman.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy, Section 1 Definition of a Service Request, Paragraph 1.5 - Complaints Process which states that "If a resident or individual expresses dissatisfaction at any point as part of a service request they will be given the choice to escalate the matter to a formal complaint."	If a resident or their representative makes an expression of dissatisfaction about the response to a Service Request this would be escalated to a Stage 1 complaint. As part of this process, the Council would not stop seeking to address the issues raised in the service request. In May 2026, the Council updated its Complaints Policy to make this point clearer on the recommendation of the Housing Ombudsman.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though	Yes	Complaints Policy, Section 2 Definition of a Complaint,	The Council's Complaint Policy was updated in July 2024 to provide clarity on

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		Paragraph 2.6 - Complaints Process	this using the Ombudsmen wording in the Complaint Handling Code.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy, Section 3 Matters Falling Outside the Scope of the Complaints Procedure, Paragraph 3.1 - Complaints Process	This reflects the provisions of the Complaint Handling Code of the Housing Ombudsman.
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: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	Complaints Policy, Section 3 Matters Falling Outside the Scope of the Complaints Procedure, Paragraph 3.2 - Complaints Process	The relevant extract of our Complaints Policy identifies six areas where the Complaints Policy will not apply. These are: • Where the resident/individual has known about the issue for more than 12 months unless there is good reason for the delay or if there are safeguarding or health and safety issues. • Where legal proceedings have already started. This is defined as details of the claim, such as the Claim Form or Particulars of Claim, have been filed at Court. • Matters that have already been considered

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				under the Council's Complaints Policy or by the Ombudsman. • Something for which there is a statutory right of appeal or that can be appealed about to a tribunal (such as the Housing Benefit Appeals Service) or go to court about, unless there is a good reason the resident/individual should not be expected to use that appeal right. • Anonymous complaints will not normally be accepted as it would not be possible for the Council to respond to them. However, the Head of Corporate Services and Democracy in consultation with the Council's Monitoring Officer will consider any anonymous complaint received on a case-by-case basis as to whether

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				it should be investigated further. Allegations that a Councillor has failed to comply with the Code of Conduct for Members. A summary of the arrangements for handling complaints against Members is set out in Annex C of this Policy. It should be noted that there are certain circumstances where the Council may accept complaints about handling of complaints under the Code of Conduct.
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	Complaints Policy, Section 3 Matters Falling Outside the Scope of the Complaints Procedure, Paragraph 3.1 - Complaints Process	The Complaints Policy states that “the Council must accept a complaint unless there is a valid reason not to do so.” Where complaints are received outside the time limit, there is a presumption that the complaint will be

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				accepted unless there are justifiable reasons for not doing so.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy, Section 3 Matters Falling Outside the Scope of the Complaints Procedure, Paragraph 3.3 - Complaints Process	This is detailed at paragraph 3.3 of the complaints policy. Where the Corporate Services team decide not to accept a complaint, the details of the relevant Ombudsman will be provided. If the reason for rejection is that the complaint is in respect of a service provided by another local authority (such as the county council), the details of that bodies complaints process will be provided.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy, Section 3 Matters Falling Outside the Scope of the Complaints Procedure, Paragraph 3.1 - Complaints Process The relevant extract of the Complaints Policy:	The Council operates on a presumption that a complaint or service request will be accepted unless there is a valid reason not to do so.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			“The Council must accept a complaint unless there is a valid reason not to do so. Each complaint will be considered on its own merits and where the Council decides not to accept a complaint it will explain its reasons for why the matter is not suitable for the complaints process and will be advised of right to take the decision not to accept the complaint to the appropriate Ombudsman.”	

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	Complaints Policy, paragraph 4.1 of Section 4 Accessibility and Awareness - Complaints Process “The Council will provide several different channels (methods) through which residents and individuals may make a complaint and in keeping with its duties under the Equality Act 2010 will make reasonable adjustments for those that need to access the complaints process. A record of any reasonable adjustments will be made, and the agreed reasonable adjustments will be kept under active review as appropriate.” Complaints Policy, Section 6, The Complaint Handling Process - Complaints Process Extract from Paragraph 6.2(d) of Section 6 of the Complaints Policy: “(d) Make any reasonable adjustments for individuals where appropriate under the Equality Act 2010. The Council must keep a record of any reasonable	The Council fully complies with its Public Sector Equality Duties and if a reasonable adjustment is required it will be implemented. An Equality Impact Assessment has been undertaken for the Complaints Policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			adjustments agreed, as well as a record of any disabilities a resident/individual has disclosed. Any agreed reasonable adjustments will be kept under active review."	
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	Complaints Policy, Section 4, Accessibility and Awareness, Paragraph 4.1 - Complaints Process "Complaints can be raised with any member of staff. All staff will be made aware of the complaints process and will know how to pass the details of the complaint to the appropriate person or department within the Council." Complaints Policy, Section 7, The Complaints Procedure, Paragraph 7.1 - Complaints Process "Complaints about a Council service can be made: • Using the on-line complaint form • In writing (letter or email) • Using the Council's Complaint leaflets (these are available at the Whitfield Reception or can be posted to the resident)	Complaints can be raised with any member of staff. The Council's customer services team are also trained in how to deal with service requests and complaints as they will often be the main point of contact for most residents. Arrangements are in place to ensure that the Council's LATCO (PartnershipOne) providing several services know how to pass on to the council's complaint officers any details of a complaint that has been received directly by it.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			• Via the telephone • In-person to officers of the Council or at the Council Offices by appointment."	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaints Policy, Introduction – Complaints Process Extract from section: "Complaints and compliments are viewed as valuable feedback and, as a 'learning organisation' the Council should endeavour to use the lessons learnt from this feedback to improve the services we provide."	Additionally, as part of the quarterly report to Cabinet, this point is emphasised.
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	This can be found in the Complaints Policy - Complaints Process - and on our website - Make a complaint - Dover District Council	The Council seeks to inform residents about the correct channels for complaints and service requests, and the Council has an article about the complaints process in the newsletter. As of September 2026, the complaints team has started quarterly meetings with the tenants group.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including	Yes	The Ombudsman's details can be found in the Complaints Policy (section 14 Ombudsman Details -	The Council provides details on the Complaints Policy on the website,

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	information about the Ombudsman and this Code.		Complaints Process) and an explanation of the complaint process with Ombudsman details are on our website - Make a complaint - Dover District Council	including how to escalate to the Ombudsman, and publishing this self-assessment form. Additional methods such as through the tenants newsletter have been used and discussions are on-going with the tenants group on what they see as the best ways of publicising the Complaints Policy.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy, Section 4 Accessibility and Awareness, Paragraph 4.3 - Complaints Process "The Council will give residents and individuals the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the Council concerning their complaint."	The Council will seek to establish that consent has been given by the resident to their representative and once established will deal with the resident's representative (which can include a ward councillor). A resident can be accompanied by their representative at any meeting.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	This can be found in the Complaints Policy (section 14 Ombudsman Details - Complaints Process) and an explanation of the procedures with	The Council has information available to tenants and leaseholders on the Council's website.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	individual can engage with the Ombudsman about their complaint.		Ombudsman details are on our website - Make a complaint - Dover District Council As part of Stage 1 and Stage 2 responses, or where an extension of time is required, the following standard wording is used: “Please note you can contact the Housing Ombudsman Service at any point during the complaint process. The Ombudsman will not usually investigate your complaint whilst your complaint is going through our internal complaint procedure but may be able to offer advice. The contact details for the Housing Ombudsman are as follows: • Website: https://www.housing-ombudsman.org.uk/ • Telephone: 0300 111 3000 • Email: info@housing-ombudsman.org.uk Address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET”	Residents are made aware of this option although they are encouraged to go through the Council's complaints process first as their issues can often be resolved at the initial point of contact.

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 Corporate Services team is responsible for complaint handling, liaison with the Ombudsman and ensuring that complaints are reported to the Cabinet (the governing body).	The Council undertook a review of its resourcing for complaints in 2024, and with effect from January 2025 increased the size of the Corporate Services complaints team.
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	The Corporate Services Officer has access to all levels of the Council, including direct access to the Chief Executive, Directors, Statutory Officers and Heads of Service. Additionally, they have similar direct access to Council's elected leadership if required.	The Corporate Services Officer can additionally call upon the support of the Head of Corporate Services and Democracy who reports directly to the Deputy Chief Executive.
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	The current Corporate Services team are all suitably trained and experienced in the complaint procedure and complaints handling.	Regular refreshes of knowledge are encouraged, and training will be undertaken as required. If any deficiency or an improvement opportunity for staff development is identified, then a budget has

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				been identified to provide training.

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	Complaints Policy - Complaints Process	The Council has a single Complaints Policy that deals with complaints under this Code. Residents will never be treated differently if they choose to raise a complaint. The Council views all complaints as an opportunity for reflection and potential service improvement.
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	Complaints Policy - Complaints Process	The Council operates a two stage complaints process in line with the provisions of the Complaints Handling Code. There are no additional named stages or informal stages. The Housing Ombudsman made a recommendation in respect of this point that was incorporated into the updated Complaints Policy in May 2026.
5.3	A process with more than two stages is not acceptable under any circumstances	Yes	Complaints Policy - Complaints Process	The Council operates a two stage complaints process in

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	as this will make the complaint process unduly long and delay access to the Ombudsman.			line with the provisions of the Complaints Handling Code.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints Policy, Section 8 Stage 1 of the Complaint Handling Process, Paragraph 8.10 - Complaints Process "Stage 1 complaints should be responded to by the relevant service, rather than a contractor, as they are best placed to resolve the matter and ensure compliance with the provisions of the Complaints Policy. Where a third party such as a contractor responds on the Council's behalf at Stage 1, the relevant service on behalf of the Council will ensure that the complaint is handled in accordance with the provisions of the Complaints Policy. If all or part of the complaint is not resolved to the resident/individual's satisfaction at Stage 1 by the third party (such as a contractor), it must be escalated to Stage 2 of the complaint procedure within the timescales set out in the	It is the Council's preference that complaints involving contractors are wherever possible dealt with by the contracting council service. This ensures that oversight is provided and ensures that systemic issues can be quickly identified. Where a contractor operating on behalf of the Council deals with Stage 1 complaints, these will automatically progress to Stage 2 if the resident still remains dissatisfied. The Council has recently updated its internal guidance for complaints involving contractors.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Complaints Policy. Stage 2 complaints are dealt with by the Corporate Services team.”	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy, Section 8 Stage 1 of the Complaint Handling Process, Paragraph 8.10 - Complaints Process	Any complaint response that is handled by a third party remains under the scope of our Complaints Policy and therefore in line with the requirements of the Ombudsman Complaint Handling Code.
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	Complaints Policy, Section 8 Stage 1 of the Complaint Handling Process, Paragraph 8.11 - Complaints Process Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.10 - Complaints Process This matter was clarified following the recommendations of the Ombudsman.	All response letters sent out to residents who have raised a complaint will include a full breakdown of the landlords understanding of the complaint and the outcome the resident is seeking. In cases where this information is not known the resident will be contacted for further clarification. A template for Stage 1 and Stage 2 responses has been developed that further reinforce this.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are,	Yes	Complaints Policy, Section 8 Stage 1 of the Complaint	In the event that an aspect of the complaint raised is not part of the Council's

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and are not, responsible for and clarify any areas where this is not clear.		Handling Process, paragraph 8.15 - Complaints Process Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.10 - Complaints Process	responsibility and therefore, outside of the Complaints Policy, the response will advise this and wherever possible direct the resident/individual to the appropriate body that has responsibility.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; 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	Complaints Policy, Section 8, Stage 1 of the Complaint Handling Process, Paragraph 8.15 - Complaints Process Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.10 - Complaints Process	Complaints are usually responded to by Managers or Heads of Service who have the skills and experience necessary to meet the requirements.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy, Section 8, Stage 1 of the Complaint Handling Process, Paragraph 8.6 – Complaints Process Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.8 - Complaints Process	The Complaints Policy also states at paragraph 8.7 (Stage 1) and 9.9 (Stage 2) that where an extension is required the details of the relevant Ombudsman should be provided.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			"Where a response to a complaint will fall outside the timescales set out in this process (i.e. where an extension is required), the Council will agree with the resident/individual, suitable intervals for keeping them informed about their complaint."	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints Policy, Section 6, The Complaint Handling Process - Complaints Process Extract from Paragraph 6.2(d) of Section 6 of the Complaints Policy: "(d) Make any reasonable adjustments for individuals where appropriate under the Equality Act 2010. The Council must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident/individual has disclosed. Any agreed reasonable adjustments will be kept under active review."	All officers have undergone equalities training as part of the induction process. Records of any reasonable adjustments are kept. Reasonable adjustments are made as required to meet the resident's needs in accordance with the Equality Act 2010.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaint Policy, Paragraph 6.10, Section 6 The Complaint Handling Process - Complaints Process “6.10 The Council will not refuse to escalate a complaint through all stages of the complaints process unless there are valid reasons to do so. Where the Council does refuse to escalate a complaint through all stages the reason(s) for this will be clearly set out in the response. See Section 3 (Matters Falling Outside the Scope of the Complaints Procedure) for further information.”	The Complaints Policy is compliant with section 2 of the Complaint Handling Code. Additionally, any decision not to escalate a complaint would require the agreement of the Head of Corporate Services and Democracy. If the Council were to refuse to escalate a complaint to Stage 2, it would provide the resident with a written explanation that clearly set out the reasons for refusal.
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	In-House Complaints System	The Council has a dedicated complaints system that records the progress of complaints and outcomes at each stage of the process. This also captures all correspondence, documentation, etc. on the matter.
5.13	Landlords must have processes in place to ensure a complaint can be remedied	Yes	Complaints Policy, Paragraph 6.3, Section 6, The Complaint	The Council actively encourages resolving

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		Handling Process - Complaints Process “A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the customer and whether there are any urgent actions required.”	complaints at any stage of the complaints 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	Council Complaints Policy, Section 11 Unreasonable Behaviour and Vexatious Complaints - Complaints Process The Council has internal corporate guidance for dealing with vexatious, unreasonably persistent and abusive customers in respect of the complaints process. Additionally, the Council has developed an Managing Unacceptable Behaviour Policy (Housing) specifically in relation to tenants - Managing-	Where arrangements are put in place under the Council's procedures and policies these will be reviewed at scheduled intervals.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Unacceptable-Behaviour-Policy-2024-v2.0.pdf	
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	Council Complaints Policy, Section 11 Unreasonable Behaviour and Vexatious Complaints - Complaints Process Corporate - Approved Guidelines for Dealing with Vexatious, Unreasonably Persistent or Abusive Customers Housing – Managing Unacceptable Behaviour Policy Housing - Vulnerable Tenant Policy, which is considered alongside any action. Equality Impact Assessments are undertaken in respect of all policies.	The Council considers the provisions of the Equality Act 2010 when placing any restrictions in place.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.18 - Complaints Process "Most Stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident/individual"	The Council actively encourages resolving complaints at any stage of the complaints process having regard to the complexity of the case and whether the resident is vulnerable or at risk.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.1 - Complaints Process	The complaints policy states: "The Council will acknowledge and log complaints WITHIN 5 WORKING DAYS of the complaint being received. The resident/individual will be advised of the process involved." The Council's complaints system records when the complaint is received and when it is acknowledged. This will be reported on as

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				part of the monitoring process.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.2 - Complaints Process sets out the timeframe for a full response.	The Council's complaints system will automatically send a reminder email to the responding service at 8 working days and a manual reminder will be sent from Corporate Services on the 10 th working day.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.4 - Complaints Process	Extract from Complaints Policy: "The Council may occasionally decide that an extension to this timescale is needed when considering the complexity of the complaint. In such cases the resident/individual will be informed of the expected new timescale for response. Any extension should be no more than 10 working days without good reason, and the reason(s) should be clearly explained to the individual."

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.7 - Complaints Process	Extract from Complaints Policy: “When a resident/individual is informed of the need for an extension to the timescale for a response, they should also be provided with the details of the relevant Ombudsman.” The Council has always provided the contact details of the Ombudsman when requested by a resident regardless of the stage of the complaint. These contact details are also clearly set out on the Council’s website in the complaint section and are contained within the complaints policy.
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	Yes	Complaints Policy, Section 8 Stage 1 The Complaint Handling Process, Paragraph 8.12 - Complaints Process	Extract from the Complaints Policy: “The response to the complaint should be provided to the resident/individual (and/or

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	actioned promptly with appropriate updates provided to the resident.			their representative) when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions should still be tracked and actioned promptly, with appropriate updates provided to the resident/individual (or their representative). It is the responsibility of the officer responding to the Stage 1 complaint to ensure that any outstanding actions are resolved as promised in the Stage 1 response.”
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	Complaints Policy, Section 6 The Complaint Handling Process, Paragraph 6.7 - Complaints Process	Extract from the Complaints Policy: “The response to the complaint must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.”

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy, Section 6 The Complaint Handling Process, Paragraph 6.9 - Complaints Process	Extract from Complaints Policy: “Where the resident/individual (or their representative) raises additional issues during the investigation, these should be incorporated into the investigation and response if they are relevant, and the response has not yet been finalised/issued. Where the response has been issued, or it would unreasonably delay the response, the additional issues should be logged as a new Service Request or Stage 1 complaint.”
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes	Complaints Policy, Paragraph 8.11, Section 8 Stage 1 The Complaint Handling Process - Complaints Process	Extract from Complaints Policy: The Council should confirm the following in writing to the resident/individual at the completion of Stage 1 in clear, plain language the following:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			• the complaint stage • the Council's understanding of the complaint • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • the details of any outstanding actions; and • the details of how to escalate the matter to the Stage 2 process and/or the Ombudsman if the resident/individual remains dissatisfied. This should use the agreed form of words set by the complaints team. This is further reinforced in the template Stage 1 letter.

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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.1 and 9.14 - Complaints Process	Extract from Complaints Policy: "9.1 If all or part of the complaint is not resolved to the resident/individual's satisfaction at Stage 1, it must be progressed to Stage 2 of the complaint procedure. Stage 2 is the Council's final response." "9.14 The Stage 2 response will be the Council's final response and will involve all suitable staff members needed to issue such a response."
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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.2 - Complaints Process	Extract from Complaints Policy: "Requests for stage 2 must be acknowledged, defined and logged at Stage 2 of the complaint's procedure WITHIN 5 WORKING DAYS of the escalation request being received."

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.4 - Complaints Process	Extract from Complaints Policy: “There is no requirement for the resident/individual to explain their reason for requesting their complaint to be considered at Stage 2. However, if any aspect of the complaint is unclear, the Council will ask for clarification.”
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.5 - Complaints Process	Stage 1 complaints are responded to by an officer in the relevant department. Stage 2 responses are provided by a member of the Corporate Services team.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.6 - Complaints Process	Extract from Complaints Policy: “The Council will issue a final response to the stage 2 WITHIN 20 WORKING DAYS of the complaint being acknowledged.”
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Complaints Policy, Section 9 Stage 2 of the Complaint	The Council has not required an extension of more than 20 days during 2024/25 at

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		Handling Process, Paragraph 9.7 - Complaints Process	Stage 2 of the complaints process. Please see the accompanying Annual Complaints Performance Report 2025 for further details on response times.
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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.9 - Complaints Process	Extract from Complaints Policy: “When it is necessary to inform a resident/individual about an extension to these timescales the resident should be provided with the details of the relevant 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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.12 - Complaints Process	The response is sent to the resident when the answer to complaint is known. If there should be any outstanding actions, these will be listed within the written response with target/arranged dates. As a matter of procedure, the service responsible for delivering the actions is

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				responsible for tracking these actions until they are completed and providing the resident with any updates.
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	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.10 - Complaints Process	This requirement is set out in full in paragraph 9.10
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 g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Complaints Policy, Section 9 Stage 2 of the Complaint Handling Process, Paragraph 9.11 - Complaints Process	As the Corporate Services team is responsible for all Stage 2 responses, this provides for consistency in the responses at this level ensuring that the points are met.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff	Yes	Complaints Policy, Section 9 Stage 2 of the Complaint	Complaints Policy Extract:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	members needed to issue such a response.		Handling Process, Paragraph 9.14 - Complaints Process	“The Stage 2 response will be the Council’s final response and will involve all suitable staff members needed to issue such a response.” The complaints officer has access to all staff across the Council and will ensure that all suitable staff members needed to issue the response are involved.

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; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Complaints Policy, Section 10 Putting Things Right, Paragraph 10.1 and 10.2 - Complaints Process	Extract from the Complaints Policy: “These can include: • A written apology; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision (where it is possible to do so); • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Providing additional training for staff; • Changing policies, procedures or practices; and/or • Taking some other form of action.”

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy, Section 10 Putting Things Right, Paragraph 10.3 - Complaints Process	The Council will always try to ensure any remedy offered reflects the impact on the resident. The Council will, wherever possible, attempt to identify the remedy that the resident is seeking.
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	Complaints Policy, Section 10 Putting Things Right, Paragraph 10.4 - Complaints Process	When the Council responds to residents/individuals it will clearly set out what actions it is intending to take as part of any remedy. This will include the timescales of any actions. Where appropriate, appointments, repairs, etc. will be made in agreement with the resident/individual and all remedies will be monitored to ensure completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy, Section 9 Putting Things Right, Paragraph 10.12 - Complaints Process	Extract from Complaints Policy: “The Council will take account of the good practice guides issued by the relevant Ombudsman when

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				deciding on appropriate remedies"

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	Complaints Policy, Section 12 Performance Reporting, Paragraph 12.1 - Complaints Process The Annual Self-Assessment is also published on our website - Make a complaint - Dover District Council	This information is contained within the dedicated report received by the Cabinet each quarter and by the Governance Committee at its last meeting of each calendar year. The Council's Constitution assigns responsibility to the Governance Committee for the following: "To monitor complaints handling and Ombudsman investigations"
8.2	The annual complaints performance and service improvement report must be	Yes	The Annual Self-Assessment, including the Governing Body	The Council's response will be published on our

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		(Cabinet) response is published on our website - Complaints Process	complaints section of our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	The Council is not currently undertaking any significant restructure, merger and/or change in procedures that would require a self-assessment to be carried out. However, if Local Government Reorganisation were to resume, we would carry out a self-assessment.	It is likely that if Local Government Reform leads to the creation of several Unitary Authorities in Kent that there will be significant change.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If the Ombudsman asks the Council to review and update its self-assessment following an investigation it will do so.	The Council has always implemented all recommendations made by the Ombudsman.
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 an exceptional circumstance occur that meant that the Council was unable to comply with the provisions of its Complaints Policy and the Complaint Handling Code, the Council would inform the Housing Ombudsman and the affected complainants.	This situation has not arisen in 2025/26. The Council's Business Continuity Plan contains a number of actions to ensure that the complaints process is brought back to operation as quickly as possible following an incident.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Assuming that the Council's website was operational in such an incident the Council would publish timescales for returning to compliance with the Code.	

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	Complaints Policy, Introduction - Complaints Process Complaints Policy, Annex A Complaint Procedure Flow Chart - Complaints Process	The Council's Complaint Process at Stage 1 and Stage 2 ends with the need to record any Lessons Learnt as a result of a complaint. With effect for reporting on Quarter 1, 2025/26 lesson learnt formed part of the quarterly Complaints Performance reporting.
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	Complaints Policy, Introduction - Complaints Process	The Council recognises the positive impact complaints have on service delivery. Heads of Service and Managers are encouraged to view complaints as learning opportunities and utilise them as a source of intelligence to assist in the introduction of positive changes in service delivery.
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	Yes	Quarterly Complaints Report – this goes to Cabinet and Overview and Scrutiny Committee	The Council reports quarterly to Cabinet and Overview and Scrutiny on complaints through a dedicated report.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	stakeholders, such as residents' panels, staff and relevant committees.		Annual Complaints Report – this goes to the Council's Governance Committee Housing Working Group (senior officers and Cabinet members, including the Cabinet member designated as the Member Responsible for Complaints and the Housing Cabinet member) meets monthly and considers lessons that can be learnt from complaints as part of its agenda.	The Annual Report submitted to the Governance Committee supports the monitoring of complaints handling.
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 Head of Corporate Services and Democracy has overall accountability for the Council's complaints process, reporting directly to the Chief Executive.	The corporate services team in conjunction with the Housing teams can assesses any themes or trends to identify potential issues. Where potential systemic issues, serious issues/risks or revisions to policies and procedures are identified these will be reported to the relevant Head of Service to deal with.
9.5	In addition to this a member of the governing body (or equivalent) must be	Yes	Decision Notice to Appoint an MRC – June 2024	In recognition of the fact that Housing is a primarily

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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').		Councillors and Elections (dover.gov.uk) Council Constitution, Part 3 Responsibility for Executive Functions - CONSTITUTION OF THE COUNCIL	executive function, the Cabinet has been designated as the governing body. The MRC has been designated as the Portfolio Holder for Finance, Governance, Technology and Resilience. They will work closely with the Portfolio Holder for Housing. Councillor M J Nee is the current MRC.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Council Constitution, Part 3 Responsibility for Functions, Section 3 Responsibility for Executive Functions - CONSTITUTION OF THE COUNCIL	During 2025/26, the MRC received monthly briefings from the Head of Corporate Services and Democracy. At those meetings, a member of the complaints team would be present to discuss specific cases and 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,	Yes	In respect of points (a) – (c) these were covered in the monthly meetings between the MRC.	The Head of Corporate Services and Democracy will be working with the MRC on identifying the best method of delivering this information

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		Additionally, the quarterly complaints report provided updates to the Cabinet. Annual Complaints Performance and Service Improvement report is always agreed with the MRC before submission.	to the MRC and the governing body. Additional improvements are being made to the PowerBI dashboards to develop a version that would provide real time and recent historical information for points (a) – (c). Housing Working Group (senior officers and Cabinet members, including the Cabinet member designated as the Member Responsible for Complaints and the Housing Cabinet member) meets monthly and considers lessons that can be learnt from complaints as part of its agenda.
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;	Yes	For 2025/26, a monthly complaints meeting was held between the Head of Housing and the Head of Property Assets with the Corporate Services team to discuss complaints and identify lessons that can be learnt.	Dover District Council encourages services to work collaboratively with each other. This is vital in responding to complaints as these may require a response from a number of

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		Housing Working Group (senior officers and Cabinet members, including the Cabinet member designated as the Member Responsible for Complaints and the Housing Cabinet member) meets monthly and considers lessons that can be learnt from complaints as part of its agenda.	different sections within the Council. The Council has traditionally emphasised collective responsibility and does not promote a blame culture. Where shortfalls are identified, the Council's officers will take responsibility and seek to resolve the complaint. The Council is committed to acting within the professional standards for engaging with complaints as set out by the appropriate Ombudsman.