

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service

Appendix 2

Rugby Borough Council

Self-Assessment Against the Complaint Handling Code of the Housing Ombudsman Service

Date of Self-Assessment June 2026

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	As set out in the Rugby Borough Council Customer Feedback Policy (CFP) Section 1.1	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.1 & 1.15	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that it gives residents that express dissatisfaction a choice to make a complaint. - Rugby Borough Council should update its complaints policy to make

				clear that complaints from elected members on behalf of residents will be treated in line with its complaints procedure. These recommendations have been implemented.
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.10	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear the distinction between a service request and a complaint. Housing related examples of a service request such as a request for a repair when made for the first time or reports of anti-social behaviour could help to support a resident understanding of the difference between a service request and a complaint. This recommendation has been implemented.

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	As set out in our Rugby Borough Council Customer Feedback Policy - Section 1.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will raise a complaint where a resident expresses dissatisfaction with the response to their service request, confirming that when a complaint is made about its response to a service request it will not impact on the actions needed to resolve any immediate issues. I.e. the landlord will not wait for the outcome of the complaint before addressing the service request. This recommendation has been implemented.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	In line with the Transparency, Influence and Accountability Standard of the Regulator of Social Housing Rugby Borough Council undertook a Tenants Survey which took place October 2025 – January 2026. The cover letter informed tenants of the Housing Ombudsman	Extract from Tenants Survey Cover Letter “<i>This is just a reminder that you have the right to raise any housing issues with the Housing Ombudsman at any point if you are not satisfied with the service you have received from our teams. The Housing Ombudsman can provide you with free, independent advice and support. Their contact details are as follows:</i> www.housing-ombudsman.org.uk Telephone: 0300 111 3000

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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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to: • Make clear that it will not take a blanket approach to excluding complaints relating to insurance claims, making clear that complaints about the Councils' handling of the claim or communication in relation to the claim are accepted as complaints. • Make clear for residents when the landlord considers a matter is subject to legal action, for example when the Claim Form and Particulars of Claim have been filed at court

				• Remove reference to excluding complaints where the persistent/vexatious complaints procedure has been invoked • Make clear that where anonymous complaints are received, they will be logged and the matter reported actioned where it is possible to do so These recommendations have been implemented.
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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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will accept complaints referred to it within 12 months of the resident being made aware of the issue as well as within 12 months of the issue occurring and will apply discretion to accept complaints made outside of this timeframe. This recommendation has been implemented.
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that in any circumstances where it decides not to accept a complaint it will provide an explanation to the resident. - Rugby Borough Council should ensure that its complaints policy clarifies that when it decides not to accept a complaint, it will explain to the resident their right to take the decision to the Housing Ombudsman. Alternatively, the landlord can have a statement in its policy which confirms the resident has a right to contact the Housing

				Ombudsman at any point during the complaints process. These recommendations have been implemented.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	We do not take a blanket approach to excluding complaints, and it is clear that each investigation must deal with separate complaints based on their individual merits

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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	Tenants can complain in person at the Town Hall where housing staff are available to see callers every day, in writing, by phone, using our online form. We have reintroduced a “hard copy” Tenants Newsletter which is posted out to all tenants and commenced on a quarterly basis from Summer 2024, and this contains information about how to complain and information about the Housing Ombudsman Service. In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear the channels through which residents are able to make a complaint. This recommendation has been implemented.
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	

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	We monitor complaints on a quarterly basis and have a quarterly “Lessons Learnt” Clinic to ensure trends are identified and necessary actions are taken.	Staff training on complaints covers the topic of a healthy complaints culture in which we learn from complaints. Training has been delivered in March 2026 to frontline staff enabling them to recognise complaints, record them appropriately and escalate them as necessary. This training will take place annually.
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	The Rugby Borough Council Customer Feedback Policy is available on our website. It can be provided in different formats on request. Section 5.1	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it can make its complaints policy available in accessible formats where required. The landlord may wish to provide examples of formats that are available and how these can be requested. This recommendation has been implemented.
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	The Rugby Borough Council Customer Feedback Policy sets out how we will publicise our policy and information about the Housing Ombudsman Service. Section 5.1	In 2024/25 Rugby Borough Council introduced a “hard copy” Tenants Newsletter, posted to all tenants in order to reach tenants who are not connecting digitally – The Tenants Newsletter contains information about the Customer Feedback Policy, The Housing Ombudsman Service and the Complaint Handling Code in every edition. Our Tenants Handbook contains information about the Housing Ombudsman Service. In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints

				policy to make clear the methods by which it will publicise the policy, maximizing accessibility and awareness of its complaints policy for residents who may not refer to its website for this information. This recommendation has been implemented.
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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	As set out in the Rugby Borough Council Customer Feedback Policy.	This will be promoted through our Tenants Newsletter; in 2026/27 our Tenants Handbook will be reviewed and the opportunity for tenants to have a representative deal with a complaint and to be represented or accompanied will be made clear.
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 5.1	Information on how to engage with the Housing Ombudsman Service is set out in the Tenants Newsletters which is posted out in hard copy to all tenants quarterly and also in the Tenants' Handbook.

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	RBC Communications Team take responsibility for complaint handling. Complaints are assigned to a relevant officer and the Communications Team have oversight of the complaint within the system. Complaints are reported as part of wider key indicators. A quarterly report is submitted to the full Council. Complaint trends are also examined by the Audit & Ethics Committee of the Council.	The Complaints Performance and Service Improvement Report 2024/25 was considered by RBC Cabinet in September 2025, and the report and Cabinet response was provided to the Housing Ombudsman Service. The Complaint Performance and Service Improvement Report 2025/26 will be considered by the Complaints Working Party and RBC Cabinet in Q2 2026/27. There is a monthly report to our leadership team. The Strategic Director for Communities is the chair of the Lessons Learnt Clinic and has oversight of all complaints in the landlord service.
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 complaints officer allocates complaints to appropriate managers through our system.	

4.3	Landlords are expected to prioritize 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	All investigators and responders have undertaken training in complaint handling and have signed up to the Housing Ombudsman Centre for Learning in order that they can access the resources there. Our Housing Services Manager has completed the Housing Ombudsman's e-learning on Dispute Resolution and applying Dispute Resolution.	We have an established quarterly Lessons Learnt Clinic that monitors compliance and facilitates learning from complaints.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.2	In its review April 2026, the HOS recommended - (5.2 & 5.3) Rugby Borough Council should review its complaints policy to make clear that where it identifies an issue that can be dealt with 'quickly' which meets the definition of a complaint it will give the resident the choice to make a complaint in line with provision 1.3 of the Code.

				This recommendation has been implemented.
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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	As set out in in the Rugby Borough Council Customer Feedback Policy Section 1.2	In its review April 2026, the HOS recommended - (5.2 & 5.3) Rugby Borough Council should review its complaints policy to make clear that where it identifies an issue that can be dealt with 'quickly' which meets the definition of a complaint it will give the resident the choice to make a complaint in line with provision 1.3 of the Code. This recommendation has been implemented.
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	As set out in in the Rugby Borough Council Customer Feedback Policy Section 2	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2	

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.	No	As set out in the Rugby Borough Council Customer Feedback Policy Section 2	We have developed a suite of standard letters that guide investigators and responders in setting out the complaints and the outcomes the resident is seeking. We have implemented a training programme for investigators and responders that ensures tenants are contacted following their making a complaint to ensure we understand the complaint definition. In its review April 2026, the HOS recommended - (5.6 & 5.7) • Rugby Borough Council should review its complaints policy to make clear that in the acknowledgement of stage 1 complaints or in escalations to stage 2 it will set out to the resident: • Its understanding of the complaint • The outcomes the resident is seeking • Which aspects of the complaint it is and is not responsible for We do not comply with this currently in respect of acknowledgements as our complaints system generates acknowledgements for residents, RBC contacts the resident early in the investigation to ensure a shared
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				understanding of the matter.
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.	No	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.5	In its review April 2026, the HOS recommended - (5.6 & 5.7) • Rugby Borough Council should review its complaints policy to make clear that in the acknowledgement of stage 1 complaints or in escalations to stage 2 it will set out to the resident: • Its understanding of the complaint • The outcomes the resident is seeking • Which aspects of the complaint it is and is not responsible for We do not comply with this, as our complaints system generates acknowledgements and currently does not offer functionality for bespoke acknowledgments. We contact the resident early in the investigation to ensure a shared understanding of the matter.

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5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully.	Yes	At stage 1 the investigation will be carried out by an impartial officer, complaint responses are monitored by our Communities and Projects Manager. At stage 2 our Chief Officers ensure they are able to carry out an objective review of the complaint, should there be any conflict of interest they will arrange for another Chief Officer to undertake the stage 2 process.	
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	Investigators and responders have been training in the use of extensions and we have a standard letter that guides officers. Section 1.10 of the Customer Feedback Policy	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that when a complaint response falls outside of the extended timescales set out in the Code (10 working days at stage 1 and 20 working days at stage 2) it will agree with the resident suitable intervals for keeping them informed about their complaint. This recommendation has been implemented.

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	We are using guidance set out in the document: Spotlight on attitude, respect and rights – relationship of equals. In addition we are have implemented a new housing management system which has improved our ability to keep accurate and up to date records and also embarking on a programme of tenancy health checks which will improve out knowledge of our residents	
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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		
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	Our complaints system holds all documentation relating to each complaint.	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22	
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	Relevant policies include: Persistent Contact Procedure and the Potentially Violent Persons Procedure.	
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	As set out in the Persistent Contact Procedure	

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	As set out in the Rugby Borough Council Customer Feedback Procedure	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.11	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that stage 1 complaints are acknowledged, defined and logged within either its current response timeframe or a timeframe within the 5 working day parameter set out in the Code. This recommendation has been implemented.

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.11	In 2025/26 we achieved 82% of complaints responded to at stage 1 within the 10-working day response time (as set out on our Complaints Performance and Service Improvement Report 2025/26). We will continue to monitor this closely. Dedicated staff training & quality monitoring of responses have contributed to this substantial increase from last year. In its review April 2026, the HOS recommended - • Rugby Borough Council should review its complaints policy to make clear within its 'response times' table that a response to a stage 1 complaint is provided within 10 working days of the complaint being acknowledged. This recommendation has been implemented.
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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	As set out in our suite of standard letters. Section 1.11 of the CFP	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that at stage 1 complaint extensions will be no more than 10 working days without good reason and contact will be made with the resident to explain its reasons and the expected timescale for response. - This recommendation has been implemented.
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	Covered in our training to investigators and responders and included in our suite of standard letters.	
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	As set out in the Rugby Borough Council Customer Feedback Policy, also covered in our training and in our suite of standard letters. Section 1.11 of the CFP	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will provide its complaint response when the answer is known and not when all outstanding actions are completed and where outstanding actions are included with a complaint response updates are provided to residents

				through to completion. This recommendation has been implemented.
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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 set out in the Rugby Borough Council Customer Feedback Policy and guidance provided to investigators and responders through training and our suite of standard letters.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy – Section 1.20	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will incorporate any related additional complaints into the stage 1 response if it has not been issued or would not unreasonably delay the response to do so. Any new issues will be logged as a new complaint where the stage 1 response has been issued, the issues are unrelated or it would unreasonably delay the response. This recommendation has been implemented.

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; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1 and our suite of standard letters.	
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that a complaint will progress directly from stage 1 to stage 2, if all or part of the complaint is not resolved to the residents' satisfaction. This recommendation has been implemented.
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that stage 2 complaints are acknowledged, defined and logged within either its current response timeframe or a timeframe within the 5 working day parameter set out in the Code. This recommendation has been

				implemented.
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	As set out in the Rugby Borough Council Customer Complaints Policy. We accept complaints at stage 2 at the direction of the resident. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that residents are not required to provide reasons for requesting their complaint to be escalated to stage 2. This recommendation has been implemented.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Strategic Director for Communities will normally consider all housing services complaints at stage 2. Should there be a conflict of interest another Director will respond to the stage 2 complaint	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	The Rugby Borough Council Customer Feedback Policy sets out a 20 working day response time for stage 2 complaints. Section 1.1 of the CFP	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear within its 'response times' table that a response to a stage 2 complaint is provided within 20 working days of the complaint being acknowledged. This recommendation has been implemented.
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	As set out in the Rugby Borough Council Customer Feedback Policy and supported by our suite of standard letters. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that a complaint extension at stage 2 must be no more than 20 working days without good reason and that these reasons will be clearly explained to the resident alongside the expected timescale for response. This recommendation has been implemented.

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	As set out in the Rugby Borough Council Customer Feedback Policy Section 2 and included in our suite of standard letters.	
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	As set out in the Rugby Borough Council Customer Feedback Policy and our suite of standard letters. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will provide its complaint response when the answer is known and not when all outstanding actions are completed and that where outstanding actions are included with a complaint response updates are provided to residents through to completion. This recommendation has been implemented.
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	Guidance is provided through training and through our suite of standard letters, complaint responses are routinely monitored by our complaints officer. Our Communities and Projects Manager facilitates our Lessons Learnt Clinic which also maintains an oversight of responses and their effectiveness	

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	As set out in our suite of standard letters.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		All suitable staff members are involved as appropriate in our stage 2 responses.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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: • Apologizing; • 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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22 and through our suite of standard letters.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We follow guidance provided by the Housing Ombudsman Service through it's comprehensive content for landlords	
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	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22 and through our suite of standard letters.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies	Yes	Yes, as stated in 7.2	

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: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. - 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; - any findings of non-compliance with this Code by the Ombudsman; - the service improvements made as a result of the learning from complaints; - any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Our 2025/26 Complaints Performance and Service Improvement Report is available on our website. We had 0 CHFO's in 2025/26	In its review April 2026, the HOS recommended - - In its annual report as part of its year 3 submission Rugby BC should include specific reference to whether the landlord has received any CHFO/Ns across the reporting year. - In its annual report as part of its year 3 submission Rugby BC should include a link to its landlord performance report published by HOS where a report has been provided. These recommendations have been implemented.

8.2	The annual Complaints Performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The Complaints Performance and Service Improvement Report 2025/26 is published on the website and will be reported to Members in the appropriate way as soon as is practicable.	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	If required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If required	
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	Noted	

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 have established a Lessons Learnt Clinic which meets quarterly to consider the Complaints Performance and Service Improvement Report for the previous quarter and consider complaints and serious incidents.	The Lessons Learnt Clinic has Terms of Reference and is chaired by the Strategic Director for Communities.
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	Our Lessons Learnt Clinic facilitates a positive complaint handling culture, and this is built into its functions and scope through a term of reference.	
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	We report on complaints to our Tenants Panel, and to staff at team meetings and through our Tenants Newsletter.	
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	Our Communication Consultation and Information Manager is the senior lead person accountable for complaints within the Borough, for complaints relating to housing services they are supported by the Communities and Projects Manager within the Communities and Homes directorate. The Strategic Director for Communities is responsible for all Stage 2 responses for complaints for landlords services, they maintain oversight of all complaints through chairing the Lessons Learnt Clinic.	

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 Portfolio Holder for Communities and Homes, Regulation and Safety is the Member Responsible for Complaints.	
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	See 9.5	

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	Our Complaints Performance and Service Improvement Report 2025/26	
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	Rugby Borough Council has adopted a Performance Development Review process, this process will include a standard objective in relation to complaint handling for all relevant employees.	

