

Housing Ombudsman Complaint Handling Code Self-Assessment.

Milton Keynes City Council 2024-2025

September 2025

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Welcome and purpose of this report

Milton Keynes City Council uses customer feedback to improve service delivery and drive permanent changes to policy and practice by our service areas for the benefits of our residents and customers in Milton Keynes.

Our self-assessment gives us a formal opportunity to score our performance on our continuing journey to improve our Housing service delivery and identify new opportunities to improve the services delivered to our residents living in decent homes aligned with the industry standards.

The Complaint Handling Code, introduced by The Housing Ombudsman (HO), sets out a good practice for Social Housing Landlords to enable them to resolve complaints raised by their residents quickly, and to use the learning from complaints to improve services.

This document is our self-assessment against the code as of 31 March 2025

The purpose of this report is to identify areas where we are doing well, and where we recognise the need to further improve our service.

It follows a question (Q) and answer (A) structure. The questions are those asked by the HO, and the answers are from MKCC. Each question has a compliance rating which indicates our compliance with the Complaints Handling Code.

The full Complaint Handling Code is available via the following link:

[Complaint Handling Code 2024 | Housing Ombudsman Service](#)

Housing Complaints Board

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Section 1 - Definition of a complaint

Code requirement	Comply	Evidence	Commentary / Explanation
1.2. A complaint must be defined as: ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’	Yes	Complaints and Compliments Milton Keynes City Council	Our policy defines a complaint as: <i>“an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals.”</i>
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	read our complaints policy	Our policy says: <i>“An individual should 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 should still be handled in line with the organisation’s complaints policy.</i> Our Complaints policy explains the use of the service request as the first opportunity to put right dissatisfaction for residents and customers, but they can escalate to the complaint process if requested. Policy wording amended to reflect this.” Our Housing team have been focused on reestablishing working relationships with our residents over the past financial year – door knocking and postcard contact drops to improve awareness of the landlord’s team. The back-to-basics campaign continues with the development of the Residents and Officers Reflection Group which enables critical and robust engagement between the landlord and our residents.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p3)	Our policy says: A service request may be defined as: “a request that the organisation provides or improves a service, fixes a problem or reconsiders a decision.” Colleagues have sight of our Handy Hints document to help them distinguish between service request and a complaint.
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	MetaCompliance complaints training read our complaints policy (p3)	Our Complaints Policy has been refined to reflect the need for workplace teams to continue collaborating with the resident to resolve the root cause issue whilst providing a formal complaints response. To embed this as a standard practice for all colleagues within our workplace teams, a MetaCompliance policy will be refreshed as a compulsory training tool for all colleagues who interact with our residents or who respond to formal complaints.
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	https://www.milton-keynes.gov.uk/housing-consultations	We are committed to using resident feedback to change the way that we deliver landlord services. The landlord has undertaken structural changes to the way that we engage with our resident cohort. We continue to use our consultation tools to engage with residents who are always signposted to the complaints process if they are unhappy with the landlord.

Section 2 – Exclusions

Code requirement	Comply	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	read our complaints policy (p4)	Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A.</i> Also: <i>We will deal with complaints on their merits. and We will be clear with you about what we can and cannot deliver.</i>
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	read our complaints policy (p10/11/12)	The full list of exclusions are listed in our policy. Our Complaints policy is intended to inform those who represent resident groups or forums can raise a complaint: it is important to identify who is raising a complaint on behalf of larger resident groups.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p8) Corporate webpage	Our policy says: <i>We would expect you to send us a stage two request within a month of the date of our stage one response. We will use our discretion when considering stage two requests received after this. We would not consider any stage two request once 12 months have elapsed after the stage one response, unless there is a compelling reason to do so.</i>
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	read our complaints policy (p4,7,8&9)	We acknowledge complaints within 5 working days. Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A. This definition should be interpreted widely. If in doubt a matter should be recorded as a complaint.</i> An explanation is provided to those who raise complaints which are not investigated, and they are directed to the Ombudsman for further escalation. A sentence has been added to the policy to evidence this.
2.5. Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	read our complaints policy (p4)	Our policy says: <i>We will deal with all complaints under our complaints policy unless they are excluded - this is explained in Appendix A. Also: We will deal with complaints on their merits & We will be clear with you about what we can and cannot deliver.</i>

Section 3 - Accessibility and awareness

Code requirement	Comply	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	read our complaints policy (p3)	Our complaints policy says: <i>It is important that all members of the community have equal access to our Complaints Policy and process there is no wrong route for customers to raise a complaint with us</i> Our policy states that <i>there is no wrong channel to receive a complaint from a customer – it is the responsibility of colleagues to identify the complaint at the earliest opportunity.</i>
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	read our complaints policy Link to TSM results	Our Complaints policy explains the use of the service request as the first opportunity to put right dissatisfaction for residents and customers, but they can escalate to the complaint process if requested. Policy wording amended to reflect this. Our Housing team have been focused on reestablishing working relationships with our residents over the past financial year – door knocking and postcard contact drops to improve awareness of the landlord's team. The back-to-basics campaign continues with

Code requirement	Comply	Evidence	Commentary / Explanation
			the development of the Residents and Officers Reflection Group which enables critical and robust engagement between the landlord and our residents.
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	Annual Complaints Report 2024-2025	We continue to use customer feedback to drive change in policy and practice for the betterment of Milton Keynes. Our self-assessment gives a formal opportunity to score our performance and identify opportunities to improve the outcomes for residents and people visiting our city. In 2024-2025, there has been a significant increase in the number of complaints raised with the landlord – we are approaching this as an opportunity to learn from feedback and drive service improvements based on what our residents are telling us.
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	Corporate Complaints webpage Housing Complaints webpage	Our complaints policy can be found on our website: ● On the main complaints page. ● On the housing complaints page.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our policy (p5,7,8&9) MKCC Complaints webpage Housing Complaints webpage HO Complaints Handling Code Tenants and Leaseholders Annual Report Milton Keynes City Council	Contact information for the Housing Ombudsman is contained within our complaints policy as well as links to the website for more information about the code. We have changed the way that we annotate complaint acknowledgements to include a summary of the complaint matters as well as what we will not respond to.
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	read our complaints policy (p3&4)	Our complaints policy says: <i>MKCC will apply a broad view of the definition of a complaint when we receive feedback from customer. A complaint that is submitted via a third party or representative should still be handled in line with the organisation's complaints policy.</i> MKCC does not respond to self-appointed representatives, i.e. those purporting to represent others: they must be nominated to act as an advocate for the resident, and this will be verified.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p8)	Our complaints policy says: <i>If you remain unhappy it is your right to contact either the Local Government and Social Care or If you are a tenant of MKCC you can contact the Housing Ombudsman. More information is available on the Ombudsman website regarding their codes of practice and best practice when it comes to complaints handling, we will sign post you to the appropriate Ombudsman at every stage of the complaints process. The Ombudsman's role is to investigate complaints of maladministration by Local Authorities</i>

Section 4 - Complaint handling staff

Code requirement	Comply	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	read our complaints policy (p5)	Our complaints policy says: <i>Our Head of Customer Data and Insight has corporate responsibility for overseeing the process and reporting performance against our local completion times and Ombudsman targets. Our portfolio holder (Elected Councillor) has cabinet responsibility and oversight. Annually we will review our complaints performance and report this to Cabinet. MKCC continues to use customer feedback to drive change in policy and practice for improved outcomes for our residents and the people visiting our city. Residents have the right to escalate their complaint to the Ombudsman at any stage of the complaint process.</i> Our Customer Service Team is responsible for triaging the complaints, and liaising with service managers when they are investigating and resolving their complaints. Our Strategic Complaints and Improvement Manager hold the relationship for the Housing Ombudsman, acting as MKCC's Link Officer.
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		We have clear, documented procedures and processes to trigger a complaint case review which initiates a multi-disciplinary team to identify and own actions to resolve root causes identified by the complaint.

Code requirement	Comply	Evidence	Commentary / Explanation
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	Housing Complaints Board Also see evidence and commentary for 3.2	Our governance model has been enhanced by the formulation of our Housing Complaints Board. This serves as our internal multi housing disciplinary panel tasked with conducting critical case reviews for escalated complaints, sharing organisational learnings, and proposing policy or operational changes with MKCC's Landlord Board for next steps.

Section 5 – The complaint handling process

Code requirement	Comply	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	read our policy Housing Complaints webpage	All residents who make a complaint will be treated in the same way as per our complaints policy. We provide information about our complaints process on our website, although the information explains our process in the same as we do in the policy. Our website may be used to provide some additional information, but that will only concern things that are required by the Complaints Handling Code but are not covered by our Complaints 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	read our complaints policy (p3)	We do not have stage 0. In relation to early resolution, our policy says: <i>The starting point is a shared understanding of what constitutes a service request and what constitutes a complaint. We should be able to put things right through normal service request providing organisations with opportunities to resolve matters to an individual's satisfaction before they become a complaint.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p6/7)	Our complaints process is a two-stage process.
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	read our complaints policy (p6/7)	If one of our contractors is responsible for the Stage One response, this will count as being the first stage of MKCC's complaint process and residents will not be expected to raise a separate case with us directly.
5.5. Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	read our complaints policy (p6/7)	We work closely with our contractors to ensure that they apply our corporate complaints policy and undertake Customer Service training delivered by ourselves.
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	read our complaints policy (p5/6/7)	Our policy says: Acknowledgement <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days sharing with you a CU reference number. This is a unique reference number that you can use when corresponding with us regarding your complaint. We will also summarise the main issues you are raising and the outcomes you are seeking if we have not</i>

Code requirement	Comply	Evidence	Commentary / Explanation
			<i>accurately reflected what you are unhappy about, please let us know as soon as possible</i> Stage 1 <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days. We will also summarise the main issues you are raising and the outcomes you are seeking if we have not accurately reflected what you are unhappy about, please let us know as soon as possible.</i> Stage 2 – <i>Customers and residents should contact us, within twenty working days, to escalate their complaint. These complaint investigations will be carried out by a new investigating officer. Complaint responses will be completed within a total of 20 working days from the acknowledgement date. To help us to do this, we will work with you to understand:</i> <i>•What you are specifically unhappy about within the stage one response</i> <i>•The impact of on you of the concerns you have raised</i> <i>•What you expect the Council to do to put things right</i>

Code requirement	Comply	Evidence	Commentary / Explanation
			<i>Your feedback on these points will be considered. If we believe the stage one response answered all of these points, or if we need clarification on any of them, we will contact you. We will then follow our acknowledgement process.</i>
5.7. When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	read our complaints policy	As per above (5.6). As a part of our acknowledgement, we will confirm clearly which aspects of the complaint we are and are not responsible for.
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	read our complaints policy (p5)	Our policy says: <i>We will:</i> • <i>deal with complaints on their merits.</i> • <i>act independently and have an open mind.</i> • <i>take measures to address any actual or perceived conflict of interest.</i> • <i>Consider all information and evidence carefully.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p6)	Our complaints policy says: Stage 1 – Complaints will be completed within a maximum of 10 working days from the date of acknowledgement. This is unless we explain why we cannot complete the complaint investigation within that time frame and agree a date with you for completion of the complaint investigation. Stage 2 – Depending on the complexity of the investigation we may need to extend the timescales for stage two investigations by an additional 10 working days, but this will be agreed with you in good time. We will keep you up to date on progress at agreed intervals.
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.	No	read our complaints policy (p3)	Our Corporate complaints policy reflects the need to consider the use of reasonable adjustment and its associated record keeping requirements on landlord back-office systems – our practice will be implemented in the current financial year 2025 – 2026.

Code requirement	Comply	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	read our complaints policy (p7)	Our complaints policy says: Stage 1 – <i>If you are not happy with the response you receive at stage one, you can contact us within a month and ask for your complaint to be investigated at stage two.</i> Stage 2 – <i>We would expect you to send us a stage two request within a month of the date of our stage one response. We will use our discretion when considering stage two requests received after this. We would not consider any stage two request once 12 months have elapsed after the stage one response unless there is a compelling reason to do so.</i>
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	read our complaints policy	This is recorded in our customer relationship management system.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p7/8)	Our complaints policy says: <i>Providing a remedy is about putting right what has gone wrong and learning from it. We will aim to remedy any personal injustice to you where an investigation into a complaint has identified fault on the part of the Council. There must be a clear link between the fault and the personal injustice to you.</i>
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	read our unreasonable behaviour policy	We have updated our unreasonable behaviour policy which is now published on our website. As part of our ongoing service standards process within Housing Operations, we are reviewing our Tenant's Handbook to ensure that it is compliant with the code, which will be published during this financial year 2025 – 2026. We also use the tenancy agreement agreed between the resident and ourselves as the key management tool for relationship standards between both parties.
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		See 5.14 commentary.

Section 6 – Complaint stages

Stage1

Code requirement	Comply	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	read our complaints policy	<i>Our complaints policy says:</i> Time for stage 1 complaints is 10 working days post acknowledgement. We have incorporated the Ombudsman's standard for handling complaints within our policy and will endeavour to achieve this. However, it is imperative that the customer can clearly express the desired outcome from the complaints that they have raised, and that they are able to comprehend and participate in the consecutive stages of the complaints process as stipulated by the policies and practices of the landlord – and we will work with them to achieve this.
6.2. Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	read our complaints policy	Our complaints policy says: <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
6.3. Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	read our complaints policy	As per 6.1. our current timescale for stage 1 complaints response is 10 days in line with the Ombudsman's code. We acknowledge that the complaint handling code from Housing Ombudsman expect stage one complaints to be completed within 10 working days. We are ambitious and working hard to reduce our timescales in line with these expectations and will be closely monitoring our performance.
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	read our complaints policy	Aligned with 6.1, we will work with residents to understand their complaint and their expected outcome so that the response shared will successfully manage expectations. In some cases, which relate to several issues or multiple services, this may take more time to complete and we will keep the resident informed of progress.
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	read our complaints policy (pg7)	Our Complaints policy has been updated to reflect the Housing Ombudsman's required standard and our practices are evolving to do the same.

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy	Complaint responses are shared with the customer once the investigation is completed - in some cases, the resolution to the complaint may take longer and we will keep the customer informed of progress. Actions committed to within a complaint response to resolve the root cause of the complaint, are managed separately by the responsible service area with fidelity checked by our Housing Complaints Board.
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	read our complaints policy (pg9)	Our complaints policy says: In your stage one complaint response we will clearly provide information on: • the complaint stage, • the complaint definition, • the decision on the complaint, • the reasons for any decisions made, • the details of any remedy offered to put things right, • details of any outstanding actions, • details of how to escalate the matter to stage two if the resident is not satisfied with the answer.

Code requirement	Comply	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	read our complaints policy (pg6)	Any additional complaints raised by the customer which relate to the core matter, will be attached to the open complaint record for investigation and response at Stage One. If there are new matters which are unrelated to the core issue a new Stage One complaint will be raised to investigate.
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	read our complaints policy (pg7)	As per 6.7.

Stage 2

Code requirement	Comply	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	read our complaints policy (pg6)	As per our policy, in our response to stage 1 complaint we will advise the resident how to escalate the complaint to stage 2 if they were not satisfied with the resolution.
6.11. Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	read our complaints policy (pg5)	Our complaints policy says: <i>Once you have submitted your complaint, we will acknowledge your complaint within 5 working days.</i>
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	read our complaints policy (pg5/6/7)	Our complaints policy says: <i>Customers and residents should contact us, within twenty working days, to escalate their complaint. These complaint investigations will be carried out by a new investigating officer. Complaint responses will be completed within a total of 20 working days from the acknowledgement date. To help us to do this, we will work with you to understand:</i> <i>What you are specifically unhappy about within the stage one response</i>

Code requirement	Comply	Evidence	Commentary / Explanation
			• <i>The impact of on you of the concerns you have raised</i> • <i>What you expect the Council to do to put things right</i> <i>Your feedback on these points will be considered. If we believe the stage one response answered all of these points, or if we need clarification on any of them, we will contact you. We will then follow our acknowledgement process.</i>
6.13. The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	read our complaints policy	This is a standard practice for complaints investigation at MKCC
6.14. Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	read our complaints policy (p6/7)	Our policy says <i>Complaints responses will be completed within a total of 20 working days from the acknowledgement date of the complaint.</i>

Code requirement	Comply	Evidence	Commentary / Explanation
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	read our complaints policy (p6/7)	Our policy states: <i>Depending on the complexity of the investigation we may need to extend the timescales for stage two investigations by an additional 10 working days, but this will be agreed with you in good time. We will keep you up to date on progress at agreed intervals.</i>
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.	No	read our complaints policy (p7/8)	Our complaints policy has been updated to reflect the required standard and our practices are evolving to do the same.
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	read our complaints policy (p7/8)	Our complaints policy has been updated to reflect the required standard and our practices are evolving to do the same.
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	read our complaints policy (p6 &7)	Our complaints policy says: <i>In your stage two complaint response we will clearly provide information on:</i> • the complaint stage, • the complaint definition, • the decision on the complaint, • the reasons for any decisions made,

Code requirement	Comply	Evidence	Commentary / Explanation
			• the details of any remedy offered to put things right, • details of any outstanding actions, and • details of how to escalate the matter to the Housing Ombudsman Service if you remain dissatisfied.
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	read our complaints policy	As per 6.18.
6.20. Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	read our complaints policy (pg 6/7)	Our complaints process is a 2-stage process, and it will involve all colleagues that are needed to provide our full response.

Section 7 - Putting things right

Code requirement	Comply	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 reason. • 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	read our complaints policy (pg7/8)	Our complaints policy says: <i>Providing a remedy is about putting right what has gone wrong and learning from it. We will aim to remedy any personal injustice to you where an investigation into a complaint has identified fault on the part of the Council. There must be a clear link between the fault and the personal injustice to you.</i> <i>The remedies we may offer are not necessarily about money. We would look to put you back into the position you would have been in if nothing had gone wrong. We would also look at the root cause of the complaint and aim to make sure that the fault does not happen again. We may issue a financial payment to reimburse you if you have suffered a quantifiable financial loss, or it might be more of a symbolic payment which serves as an acknowledgement of the distress or difficulties you have been put through.</i> <i>We do not offer compensation in the way</i>

Code requirement	Comply	Evidence	Commentary / Explanation
			<i>a court would. In some cases, an appropriate remedy may be for us to apologise to you for the fault that caused the injustice. We may look at making a change to a practice, policy, or procedure if we think it is likely that further mistakes may affect other people in the future. When considering an appropriate remedy to a complaint, we will use our compensation policy, which is closely aligned to the Local Government Guidance on Remedies. You can find this document on the Ombudsman's website at www.lgo.org.uk</i>
7.2. Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	read our complaints policy (pg7/8)	As per 7.1.
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	MKCC Compensation Policy (This is an internal document)	Our internal compensation policy specifies 3 levels of compensation we can offer, based on 3 categories of our fault. The detailed descriptions help colleagues to decide if remedy is needed, and what type of compensation should be granted. Even though the policy does not specify the

Code requirement	Comply	Evidence	Commentary / Explanation
			timescales, once the compensations has been agreed we would follow it through to completion as soon as possible.
7.4. Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Our compensation policy is based on the guidance issued by the Ombudsman – complaint responses are considered against our policy and reviewed independently before issuance to the resident to implement practice fidelity.

Section 8 - Self-assessment, reporting and compliance

Code requirement	Comply	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	HO Complaints Handling Code Tenants and Leaseholders Annual Report Milton Keynes City Council TPS MKCC Annual Complaints Report	Current scrutiny reporting for landlord complaint performance is being reviewed in line with the new HO requirements. Our second submission report on 2024-2025 is published on the website and submitted to Landlord for review. We also include complaints as part of our Tenant and Leaseholder annual report. We are in the process of publishing this year's report that will then be available on our webpage.

Code requirement	Comply	Evidence	Commentary / Explanation
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	Housing Annual Complaints Report	Annual complaints report is shared with Housing Complaints Board, Landlord Board, and our Corporate Leadership Team.
8.3. Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	In the last year we have not had any significant restructure or process change.
8.4. Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	In the last year we have not been asked to update our self-assessment by 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	N/A	In the last year we have not had any incident that would affect our compliance with the code.

Section 9 – Scrutiny and oversight continuous learning and improvement

Code requirement	Comply	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	read our complaints policy Tenant and Leaseholders Annual Report	Our complaints policy says: <i>(as a part of remedy) we may look at making a change to a practice, policy, or procedure if we think it is likely that further mistakes may affect other people in the future.</i> The Tenant and Leaseholders Annual report demonstrates how we used feedback and consultation to shape our future services.
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	read our complaints policy MKCC Complaints webpage Housing Complaints webpage Complaints Handling Code webpage Tenants and Leaseholders Annual Report Milton Keynes City Council	We have various webpages that promote a positive complaint handling culture. We assure residents to not worry that if you make a complaint, we will treat you unfavourably because of it, this will not happen. You have the right to tell us if something is wrong and we need to know. In 2024 – 2025, we have recorded a 32% increase in the number Housing-related complaints for the landlord. 83% of Stage One complaints were resolved with an escalation rate to Stage Two of 17% - this is a better result than last year.

Code requirement	Comply	Evidence	Commentary / Explanation
			We see this as a positive result as our residents are willing to raise more complaints with us for investigation and more accept the Stage One response as the final outcome. As part of our landlord governance model, our Housing Complaints Board (HCB) which is focussed on critical case review, risk identification and improvements highlighted through complaints and tenant feedback. HCB was also renamed as Resident Engagement Board (REG) and continues to have a regular reporting schedule to the Landlord Board.
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		See 9.2
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,	Yes		Our corporate lead for complaints is our Head of Customer Data and Insight and they are the accountable person for all complaints that come into the City Council including those related to our role as a

Code requirement	Comply	Evidence	Commentary / Explanation
serious risks, or policies and procedures that require revision.			landlord. The Head of Customer Data and Insight reports up to the MKCC Landlord Board who owns the strategic responsibility of its Housing portfolio, taking direction and guidance from the Authority's Corporate Leadership Team, and comprises of 7 senior directors, led by Chief Executive. The Senior Director for Customer and Community Services is accountable for complaint handling across the authority and leads an improvement board focussed on evaluating themes, identifying potential systemic issues, and mitigating against serious risk.
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 Cabinet member for Housing holds this responsibility.

Code requirement	Comply	Evidence	Commentary / Explanation
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		As per 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	Housing Complaints Board agenda (internal document)	

Code requirement	Comply	Evidence	Commentary / Explanation
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	What makes us Milton Keynes City Council brochure	We have our corporate values and expectations that covers all these points. They fall under three main categories: • We are Dedicated. • We are Respectful. • We are Collaborative. • We are Milton Keynes City Council We advertise those values across our council building, as well as in our weekly One Council email to all staff, and on our website.

