

## Housing Ombudsman Service

**Complaint Handling Code Self Assessment** Author – Paul Walker (Executive Director of Repairs and Maintenance) and Marc Innes (Head of Customer Service Centre).

### Section 1 - Definition of a complaint

Code section	Code requirement	Compl y: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	<ul style="list-style-type: none"> <li>• <a href="#">Complaints Policy</a> – section 4 Key definitions (page 5)</li> <li>• Contact centre Knowledge content</li> <li>• Complaints Training Hub</li> </ul>
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy – section 1 Policy Statement and standard 1 refer to encouraging positive and negative feedback.</li> <li>• G184s Using the complaints handling process (internal document) section 2 Page 4 states customers does not have to use the word 'complaint'. Section covers right to make complaints via 3rd party / representative</li> <li>• Contact centre Knowledge content</li> <li>• Complaints Training Hub</li> </ul>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy – section 1 as above and G184s</li> <li>• Contact centre Knowledge content.</li> <li>• Complaints Training Hub</li> </ul>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy section 1 as above</li> <li>• <a href="#">G184s Using the complaints handling process</a> G184s –sections 2 / 6.4 – what if the person does not want to complain</li> </ul>

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	<ul style="list-style-type: none"> <li>Complaints Policy – section 2 Scope refers to unreasonable complaints being dealt with under G184c managing unacceptable behaviour policy which details what should be considered in making decision about the complaints</li> </ul>
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	<ul style="list-style-type: none"> <li>G184c Managing unacceptable behaviour section 4</li> <li>G184s section 7</li> <li>Complaints Training Hub</li> </ul>

### Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	<ul style="list-style-type: none"> <li>G184s Using the complaints handling process (Internal document) – section 2 ‘what is a complaint’</li> <li>Contact centre Knowledge content</li> </ul>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	<ul style="list-style-type: none"> <li>Our Insight Team read and code all comments and flag up any concerns.</li> <li>We are also reviewing further implementation of Customer Surveys where we can act within hours to customers who express dissatisfaction and look for resolution, quicker than we see today</li> </ul>

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy – standard 2</li> <li>• G184s Using the complaints handling process (Internal document) section 4 'How complaints may be made'</li> <li>• Complaints Training Hub</li> <li>• Access routes published on website, leaflet and in wider customer publications.</li> </ul> <p>From our website: "How to make a complaint If you feel dissatisfied by something we've done there are many ways to make a complaint:</p> <p>Online: Fill in our online complaints form Write: Home Group, One Strawberry Lane, Newcastle upon Tyne NE1 4BX Call: 0345 141 4663 Email: <a href="mailto:contactus@homegroup.org.uk">contactus@homegroup.org.uk</a> In person to a colleague You might want to ask someone to make a complaint for you. That could be a friend, relative or an advocate. Just as long as you have given them permission to do so."</p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<ul style="list-style-type: none"> <li>• Complaints leaflet</li> <li>• Website information</li> <li>• Translation and interpretation service available. Including, easy read, non-English language, large text or braille.</li> </ul>

2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<ul style="list-style-type: none"> <li>• Website</li> <li>• My Home Account – Customer portal</li> </ul>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<ul style="list-style-type: none"> <li>• All policies have an impact assessment.</li> <li>• Policy standard 2</li> <li>• G184s Using the complaints handling process (Internal document) section 3.1 Supporting the customer</li> <li>• Translation and interpretation service. Including, easy read, non-English language, large text or braille.</li> <li>• Through lessons learnt after complaints, enables continuous improvement</li> <li>• Our website code is compliant with W3C (World Wide Web Consortium) standards for HTML and CSS. We follow industry best practices to meet or exceed the AA standards.</li> </ul>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<ul style="list-style-type: none"> <li>• Letter templates.</li> <li>• Home Life</li> <li>• Website</li> <li>• Sign Up Pack</li> </ul>

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<ul style="list-style-type: none"> <li>• Complaint leaflet</li> <li>• Letter templates</li> <li>• Home Life magazine</li> </ul>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	<ul style="list-style-type: none"> <li>• Website</li> <li>• Complaint Leaflet</li> <li>• Letter templates</li> <li>• Real life examples</li> </ul>

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	<ul style="list-style-type: none"> <li>• Our social media team deal with, acknowledge with customer and pass these to the Complaints Team</li> <li>• G184s Using the complaints handling process (Internal document) section 4</li> </ul>

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<ul style="list-style-type: none"> <li>• We have recently moved the Complaints Team under the customer service centre, however remains independent from all parts of the business</li> <li>• The Head of Customer Service Centre leads on complaints practice and lessons learned.</li> <li>• An Executive Director owns the policy. The Chair of the governance committee is the responsible person.</li> <li>• Complaints is also an Agenda item on the Executive Team meetings and also at Board meetings</li> <li>• G184r Complaints handling overview and governance (internal document)</li> </ul>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	As above

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy – standard 1 refers to taking and positive attitude and treating customers with respect and professionalism at all times</li> <li>• G184r Complaints handling overview and governance (internal document) covers roles and responsibilities and training requirements</li> <li>• Training Hub</li> <li>• Learning &amp; Development Hub</li> </ul>

### Section 4 - Complaint handling principles

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy standard 1 and training set out requirement to follow required stages and timescales. Timeframe for acknowledgement and stage 1 / stage 2 responses are set out in appendix 1 of the policy</li> <li>• Policy section 2 Scope states that Matters that meet our definition of a complaint [...] will be dealt with under this policy and associated procedures even where another process is being followed – example of ASB</li> </ul>

			process
4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal document) section 8 Handling complaints</li> <li>• We have made it clear to ensure that all aspects of the complaint are captured within the acknowledgement part of the process.</li> </ul>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Yes	<ul style="list-style-type: none"> <li>• Complaints policy standard 4 Timely and effective complaint handling</li> <li>• G184s Using the complaints handling process (internal document) section 9 Fairness when handling complaints</li> <li>• Centralised complaints team remains impartial and separate to all other departments within Homegroup</li> </ul>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Complaints policy standard 4 Timely and effective complaint handling</li> <li>• G184s Using the complaints handling process (internal document) section 8 Handling complaints and section 9 Fairness where handling complaints</li> <li>• System and permission restrictions enabled to ensure information recorded is confidential.</li> </ul>



4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<ul style="list-style-type: none"> <li>Complaints policy standard 2 communication and customer involvement</li> <li>G184s Using the complaints handling process (internal document) section 8.3 Communicating with complainants</li> </ul>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>set out their position</li> <li>comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Complaints policy</li> <li>G184s Using the complaints handling process (internal document) section 8.3</li> </ul>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<ul style="list-style-type: none"> <li>Complaints policy appendix 1</li> </ul>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	<ul style="list-style-type: none"> <li>Complaints policy standard 4 Timely and effective complaint handling</li> </ul>

	procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	<ul style="list-style-type: none"> <li>P184h Complaints handling process (internal document) section 5</li> <li>Complaints policy standard 3 Confidentiality sets out compliance with data protection legislation etc Standard 5 refersstand to record keeping</li> <li>Complaint handling system,</li> </ul>

			enabling more governance tracking & monitoring
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy section 2 Scope</li> <li>• P184h Complaints handling process (internal document) section 6 exceptions to process</li> <li>• process</li> <li>• Managing Unacceptable Behaviour Policy and supporting training</li> </ul>

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>4.3</b>	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<ul style="list-style-type: none"> <li>• Managing Unacceptable Behaviour Policy – includes definition of reasonableness</li> <li>• Complaints policy – section 2 Scope and standard 1 Taking a positive approach</li> </ul>
<b>4.4</b>	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy standard 1 Taking a positive approach – refers to dealing with complaints at first point of contact wherever possible</li> <li>• G184s Using the complaints handling process (internal document) section 8 Handling Complaints</li> </ul>
<b>4.5</b>	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal</li> </ul>

	meeting with the landlord where this is reasonable.		document) section 3.1 Supporting the customer and 6.1 Complaints by or about a 3 <sup>rd</sup> party
<b>4.8</b>	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal document) section 6.10 Complaints and other processes</li> <li>• P184 h Complaints handling process (internal document) section 6 exceptions to the process</li> </ul>

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<ul style="list-style-type: none"> <li>• This was recently identified in an internal audit and practice has been adjusted.</li> <li>• Complaints ;policy standard 3 Confidentiality</li> <li>• Recording reporting and learning from complaints (internal document) section 5</li> </ul>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy standard 2 Communication and customer involvement</li> <li>• P184h Complaints handling process (internal document) section 5</li> <li>•</li> </ul>
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<ul style="list-style-type: none"> <li>• Complaints satisfaction survey</li> <li>• Complaints Scrutiny Group</li> <li>• Viewpoint Team closed case reviews</li> <li>• Complaints policy standard 2 Communication and customer involvement</li> </ul>
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	<ul style="list-style-type: none"> <li>• Lessons learned programme,</li> <li>• G184g Recording, reporting and learning from complaints (internal document) section 4</li> </ul>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	<ul style="list-style-type: none"> <li>• Managing Unacceptable Behaviour Policy sections 1 and 4</li> <li>• Customer scrutiny groups</li> </ul>

## Section 5 - Complaint stages

### Mandatory 'must' requirements Stage

1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<ul style="list-style-type: none"> <li>• 10 working days is our policy and we measure this KPI.</li> <li>• Complaints policy appendix 1</li> </ul>
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>•</li> <li>• Complaints training hub</li> <li>• Emphasis on 'decision'</li> </ul>

5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.3</li> <li>• Complaints Training Hub</li> <li>• Template letters</li> </ul>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.3</li> <li>• Complaints Training Hub</li> <li>• Template letters</li> </ul>

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	<ul style="list-style-type: none"> <li>• Complaints policy standard 4 Timely and effective complaint handling</li> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.3</li> <li>• Complaint outcome and decision letters</li> </ul>
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> </ul>

	agreed between both parties.		<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal document) section 8.3 communicating with complainants and 9 Fairness when handling complaints</li> <li>• Complaints Policy and Process</li> <li>• Complaint outcome and decision letters</li> </ul>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.1.3 escalating to stage 2</li> </ul>

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.1.4 Stage 2</li> <li>• 2 tier centralised complaints team which remains independent to other parts of our business, cementing impartiality and application of fairness for our customers</li> </ul>
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<ul style="list-style-type: none"> <li>• 20 working days is our policy and we measure this KPI.</li> <li>• Complaints policy appendix 1</li> </ul>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 8.3 Communicating with complainants.</li> <li>• Complaints Training Hub</li> <li>• Template letters</li> <li>• Homegroup do not have a stage 3 within our complaints policy</li> </ul>



### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	<ul style="list-style-type: none"><li>• 2 stage process</li><li>• Complaint Policy – appendix 1</li></ul>
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"><li>• the complaint stage</li><li>• the complaint definition</li><li>• the decision on the complaint</li><li>• the reasons for any decisions made</li><li>• the details of any remedy offered to put things right</li><li>• details of any outstanding actions</li><li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li></ul>	N/A	N/A

**Best practice 'should' requirements  
Stage 1**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 6 Exceptions to process</li> <li>• G184s Using the complaints handling process (internal document) section 8.2.1 Extensions to time frame – also must be agreed with relevant director or senior leader.</li> </ul>
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 6 Exceptions to process</li> <li>• G184s Using the complaints handling process (internal document) section 8.3</li> <li>• Complaints policy appendix 1</li> <li>• Template letters</li> </ul>
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process</li> </ul>
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process</li> </ul>

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 6 Exceptions to process</li> <li>• G184s Using the complaints handling process (internal document) section 8.2.1 Extensions to time frame – also must be agreed with relevant director or senior leader.</li> <li>• Complaints policy appendix 1</li> </ul>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 6 Exceptions to process</li> <li>• G184s Using the complaints handling process (internal document) section 8.2.1 Extensions to time frame – also must be agreed with relevant director or senior leader.</li> <li>• Complaints policy appendix 1</li> </ul>

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	No stage 3 in the policy – complainants would be directed to the Housing Ombudsman or signposted accordingly
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response.	N/A	As above

## Section 6 - Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 5</li> <li>• G184s Using the complaints handling process (internal document) section 10 Putting things right</li> <li>• Complaints policy section 1 Statement</li> <li>• Website</li> </ul>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal document) section 10 Putting things right</li> <li>• G184o Discretionary Compensation – covers definition of discretionary compensation and right of appeal</li> <li>• 264 Discretionary compensation process (internal document) – covers calculation of discretionary compensation</li> </ul>
6.5	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	<ul style="list-style-type: none"> <li>• G184s Using the complaints handling process (internal document) section 10 Putting things right</li> <li>• Template letters</li> </ul>
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	<ul style="list-style-type: none"> <li>• G184o Discretionary Compensation – covers definition of discretionary compensation and right of appeal</li> <li>• 264 Discretionary compensation process (internal document) – covers calculation of discretionary compensation</li> <li>• G187a Statutory compensation (internal document)</li> </ul>

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	<ul style="list-style-type: none"> <li>• Lessons Learned programme</li> <li>• Customer Scrutiny</li> <li>• Customer involvement groups</li> <li>• G184g Recording, reporting and learning from complaints (internal document) section 4 Learning from complaints</li> </ul>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	<ul style="list-style-type: none"> <li>• P184h Complaints handling process (internal document) section 6 Exceptions to process</li> <li>• G184s Using the complaints handling process (internal document) section 6.10.5 Complaints and legal processes</li> <li>• G187a Statutory compensation (internal document)</li> </ul>

## Section 7 - Continuous learning and improvement

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	<ul style="list-style-type: none"> <li>• Board Report</li> <li>• Complaints Scrutiny Group</li> <li>• Viewpoint Teams</li> <li>• Lessons Learned Programme</li> <li>• Complaints Training Hub</li> <li>• G184g Recording, reporting and learning from complaints (internal document) section 3 Reporting and publicising complaints and 4 Learning from complaints</li> </ul>

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Chris Vallis (Senior Independent Board Member) is supported in this by the Company Secretary.
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• The Board now receive regular updates and more recently a full review on complaints was on the agenda.</li> <li>• We provided a full breakdown on KPIs, volumes, trends from Stage 1 – Ombudsmen Adjudication</li> <li>• Also provided an update on our recent progress through our internal "special</li> </ul>

The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.

- G184g Recording, reporting and learning from complaints (internal document) section 3 Reporting and publicising complaints
- G184r Complaints handling overview and governance (internal document) covers roles and responsibilities including Board
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<p><b>7.5</b></p>	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Complaints system</li> <li>• Lessons learned</li> <li>• Reviewed in Senior lead and Executive meetings as standard agenda item, reviewing trends, volumes and continuous improvement progress</li> <li>• <a href="#">G184r Complaints handling overview and governance</a> (internal document) covers roles and responsibilities including Board</li> </ul>
<p><b>7.6</b></p>	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Objective identified In the complaints handling guidance.</li> <li>• Mandatory training for all colleagues through induction</li> <li>• Refresher training modules throughout the calendar year</li> <li>• Complaints is regular agenda item for discussion within senior management meetings</li> <li>• Working groups formed throughout the business units to ensure a joint approach to managing complaints</li> <li>• G184r Complaints handling overview and governance (internal document) covers roles</li> </ul>

			and responsibilities for all colleagues
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## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members.</li> <li>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	