

2022/2023 Complaint Handling Code Self-Assessment

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: 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	We use the definition in the Housing Ombudsman Code (HOC). Section 1.2 of Complaints Policy sets out the definition of a complaint.
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	This is set out in Section 1.2 and 2.5 of our Complaints Policy.
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	Where we are unable to resolve a service recovery issue, this will be entered into our Complaints Procedure, in line with 2.9 of our Complaints Policy.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We define the reasons why a complaint may not be considered at Section 2.6 and 2.15 of our Complaints Policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	As detailed above Section 2.6 of the Complaints Policy sets out the circumstances in which we may not consider a complaint. At Section 2.15 of our Complaints Policy, we set out the reasons why we choose not to escalate a complaint to Stage 2 of our Complaints Procedure.
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	Where we choose not to accept a complaint or a request to escalate, we provide a written response that details the reasons for our decision. Additionally, the letter provides information about the customers right to approach the Housing Ombudsman (HO).

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 service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Our aim is always to resolve complaints quickly, using local resolution. This is detailed at Section 2.9 of our Complaints Policy.
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	At Section 2.4 of our Complaints Policy, we detail that advice will be provided on how to make a complaint where an individual who has been surveyed indicates they are dissatisfied.

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	We offer several differing channels by which a customer can make a complaint. This is set out in Section 2.2 of our Policy and the channels available to customers are stated on page 1 of our Complaints Procedure.
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	<p>Our Complaints Policy is available on our website, also published is the self-assessment with the HOC and our Guide to Complaints.</p> <p>The guide details in a clear and easily understandable format the stages of our Complaints Procedure, and how this is administered at each stage of the process.</p> <p>Our website offers the 'Recite Me' function which enables the content of our website to be available in different formats and languages for customers who require this due to their protected characteristics.</p> <p>Additionally, copies of all our complaint related documents are available in printed format on request.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>Our website includes an interactive complaint form which customers can complete to register a complaint.</p> <p>The Guide to Complaints is published on the website, which gives clear information about our Complaints Procedure and how we manage complaints.</p> <p>This also includes information about the HO.</p> <p>The content of our website can be changed into different formats and languages using the 'Recite Me' function, to make the information available to all our customers.</p>
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	<p>At Section 1.3 of our Complaints Policy, we confirms that complaints will be managed in line with our Equality, Diversity and Inclusion Policy.</p> <p>We consider all reasonable adjustments that are requested by customers to assist them in their interactions with us.</p> <p>Employees receive mandatory training on equality, diversity and inclusion and as stated we have a dedicated policy covering this.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>The Guide to Complaints contains the relevant information for customers about our Complaints Policy and Procedure and this is published on our website and is sent to all complainants as part of acknowledgement of their complaint.</p> <p>Likewise, it also includes information about the HO and the HOC and directs complainants to information about the HO so they can seek assistance if they wish to do so.</p> <p>We also regularly consult with residents when updating our Complaints Policy and Procedure to obtain their views and opinions.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Details of the HO are published in our Guide to Complaints and detailed on our website. We also provide a leaflet about the HO scheme with all decision letters.
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	<p>Our Guide to Complaints contains information about the rights of customers to approach the HO before, during or after a complaint.</p> <p>Employees are also aware of the HO and the HOC, this is included in internal complaint handling training provided to employees.</p> <p>We encourage communication between the complainant and the HO, as this assists early resolution.</p>

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	Complaints can be made by social media however, to ensure privacy and confidentiality customers are privately messaged to discuss their complaints. This ensures compliance with data protection.

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	The Customer Relations Team are responsible for the management of formal complaints.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Employees within the Customer Relations Team have appropriate skills, knowledge and experience. Any conflicts of interest result in re-allocation of a complaint to an alternative manager.

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"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>The Customer Relations Team are experienced in dealing with customer complaints.</p> <p>The Complaints and Customer Relations Managers have authority and autonomy to act quickly to resolve or escalate complaints to ensure we achieve the right outcome for the customer.</p>

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 within five days of receipt.</p>	Yes	<p>We seek to resolve problems through local resolution in line with the HOC, dealing with these as service recoveries. Where we are unable to resolve the matter to the customers satisfaction a formal complaint is logged and this is acknowledged within five working days.</p> <p>For the year 2022 – 2023 100% of Stage 1 and Stage 1 complaints were acknowledged within five working days.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.2	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.	Yes	<p>Acknowledgement letters set out the basis of the complaint and the resolution the customer is seeking and contain all relevant information required by the HOC.</p> <p>Following acknowledgement, the Investigating Officer/Manager contacts the customer to confirm we have understood the complaint and the resolution they were seeking.</p> <p>On occasions we may not make contact however, this is when the customer has requested all contact in writing, or the basis of the complaint has been set out clearly and no further clarification is required.</p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All complaints are investigated in an impartial manner and where any conflict of interest exists the complaint is re-allocated.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>We undertake a full and thorough investigation of all complaints we received.</p> <p>As detailed above any conflict of interest existed would result in the complaint being re-allocated.</p> <p>Investigating Officer / Managers receive training and support on complaint management and investigation, as this ensures informed decision making.</p> <p>Complaints are managed in line with our Data Protection Policy, and we ensure confidentiality is maintained, unless there is a need to protect the customer, or another individual. This would be done in conjunction with our Information Governance Team.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Customers are provided with the investigating officer / managers details as this ensure there is an open channel of communication throughout investigation of the complaint.</p> <p>We adhere to reasonable requests for a contact in a specific manner or frequency and these will be agreed with the customer.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>Customers receive contact from the investigating officer / manager within three working days of the complaint being logged and acknowledged. Thereby, allowing them to set out their position and provide any additional information or evidence, relevant to their complaint.</p> <p>At both Stage 1 and Stage 2 we notify the customer of the outcome of their complaint and that this can be discussed with the investigating manager should they have any questions or concerns about our decision.</p> <p>Where a customer contacts us, and provides additional relevant information that supports their complaint, we can choose to amend our decision and the outcome of their complaint. In these instances, a further decision letter would be sent to the customer confirming the revised outcome of their complaint.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>The Stage 1 decision letter advises the customer that they have 10 working days in which to escalate their complaint.</p> <p>We do take into consideration exceptional circumstances where a request to escalate is late being received and we also consider any reasonable requests for additional time to escalate.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints 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	<p>We set out in Section 2.15 of our Complaints Policy the reasons where we may choose not to escalate a complaint.</p> <p>Where we choose not to escalate the customer is provided with a detailed written response that explains the reason for this decision and the next steps they can take, if they remain unhappy.</p>
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	All complaints are logged and recorded and any relevant information to noted and filed to this record on our tenancy management system.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We operate an Unacceptable Behaviour Protocol, which sits alongside our Complaints Policy and Procedure. This aims to manage the unacceptable behaviour of individuals where it is impacting on the health and wellbeing of our employees or resources available to other customers.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>We set out to manage a customer's expectations from the outset of their complaint where these are considered to be unreasonable or unrealistic.</p> <p>The acknowledgement letter sent to the customer would notify them that the outcome they are seeking may not be provided, as it is outside of our control or remit, or it is disproportionate to their complaint.</p>
4.4	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	<p>We aim to resolve all complaints at the earliest opportunity and our Complaints Policy and Procedure has been written to ensure early local resolution.</p>
4.5	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 meeting with the landlord where this is reasonable.	Yes	<p>At section 2.5 of our Complaint Policy, we set out who can make complaints to us and this states complaints will be accepted from third party advocate or groups.</p> <p>We will however, in line with data protection ensure the customer has given their consent for us to deal with an advocate.</p>
4.8	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	<p>Where a complaint relates to a breach of a term of the tenancy agreement and enforcement of this, we will advise the customer the legal position and any obligations on them or us.</p> <p>We may choose not to enter a complaint in line with Section 2.6, where it relates to a breach of tenancy and there is a legal requirement for the customer to comply with this.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Letters refer to employees' job titles and not the individual officer.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	<p>All complaints are acknowledged in writing within five working days, this is followed by a phone call to the customer to discuss the basis of their complaint.</p> <p>Acknowledgement letters provide details of the timescales for a response and there is an open channel of communication between us and the customer during the investigation of the complaint.</p> <p>Where we are unable to respond within the timescales and an extension is required, the customer is notified and updated.</p>
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	<p>We actively learn from all complaints received. On completion of an investigation, we ask the investigating officer / manager to provide any learning which is then added to an action plan that is monitored by the Operational Committee.</p> <p>On completion of our Complaints Procedure, we survey customers about their experience of the complaints process. Response numbers are predominantly very low.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>We learn from all complaints and use this learning to drive positive change. We welcome complaints as they offer us an opportunity to improve our services to customers.</p> <p>Where we identify issues relating to service areas, teams or individual employees, we use this proactively to support them with improvements and where necessary retraining is provided.</p> <p>We recognise that mistakes can and will happen and it is what we learn from these that is important.</p>
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	<p>An individual's circumstances are always taken into consideration when applying any restriction under our Unacceptable Behaviour Protocol, to ensure these are appropriate, proportionate and fair.</p> <p>While consideration is given to an individual's protected characteristics, this does not prevent action under the protocol, where there is a need to protect our employees, and / or other customers or limit the impact on our resources.</p> <p>We will consider any reasonable adjustments that are requested, if they will assist the customer to comply with the restrictions placed on them or will help to modify their pattern of behaviour.</p>

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 <u>within 10 working days</u> 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	We aim to respond to all complaints within 10 working days. Where the complaint is complex or additional evidence is required, we may on occasion, extend the response time in line with the HOC.
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	Response will detail where outstanding actions need to be undertaken and they provide reassurance to the customer that these will be completed. These are added to an action plan and the investigating officer / manager takes responsibility for ensuring any outstanding actions are completed.
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	Stage 1 and Stage 2 template letters require the managers to set out each point of the complaint and their response and the outcome.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • 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 	Yes	Stage 1 and Stage 2 template letters include all the respective information to ensure customers receive a full and detailed response to their complaints. Customers receive advice on how to contact the HO for advice or complaint escalation.

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	As stated in 5.8 above the reason we may choose not to escalate are set out in Section 2.15 of our Complaints Policy. Where we decline to escalate a complaint, we provide a detailed written response to the customer setting out the reasons for our decision and their right to approach the HOS.
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 agreed between both parties.	Yes	On receipt of a complaint escalation if the issues are unclear the investigating manager who seek clarity from the customer. Once a clear understanding of the request to escalate has been obtained the customer is notified within five working days of how their complaint will progress. Where we decline to escalate a complaint, we provide a detailed written response setting out the reasons for our decision and appropriate advice is given on how the customer can proceed if they remain unhappy with our decision.
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	We will only escalate a complaint where it has first been considered at Stage 1 of our Complaints Procedure.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 investigations are completed by a manager within the Customer Relations Team.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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	<p>We aim to respond to all Stage 2 complaints within 20 working days.</p> <p>Where a complaint is complex or we additional information or evidence is needed, we may extend the response date by a further 10 working days. The customer is always informed of any extension and updated as to the reasons for this.</p> <p>If we know at the outset of a Stage 2 complaint that the issue is complex, or significant evidence is needed, we will extend the response time and notify the customer in the acknowledgement letter.</p>
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"> • 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 <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Stage 2 decision letters contain all the relevant information to ensure alignment with the HOC.

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.	Yes	We operate a two stage formal Complaints Procedure.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul data-bbox="383 579 1240 861" style="list-style-type: none">• 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 the Housing Ombudsman Service if the resident remains dissatisfied.	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 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<p>Any extension past 20 working days would be in agreement with the customer.</p> <p>Where the customer does not agree with an additional extension, they are advised to contact the HO so that further mediation can take place.</p> <p>To date we have never had to approach the HO and all extensions have been agree amicably with customers.</p>
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	Where a customer disagreed with a request to extend passed 20 working days, they would be advised to contact the HO for mediation.
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	Where appropriate to do so, investigations will consider the history of a complaint and any other relevant historic matters that may be pertinent to the complaint.
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	<p>Where additional points are raised that are relevant to the original complaint, these are included in the complaint response.</p> <p>Where additional points do not relate to the complaint, we will log another complaint to investigate these matters.</p>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	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	Any extension beyond the additional 10 working days, will always be made in agreement with the customer.
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	Where agreement cannot be reached, the customer will be advised to contact the HO to mediate.

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 <u>within 20 working days</u> 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	We operate a two Stage formal Complaints Procedure.
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	<p>Where something has gone wrong and this has been identified, we will apologise and seek to put this right and / or provide adequate redress.</p> <p>We have a range of remedies that can be considered and we may offer an alternative resolution where appropriate to do so. We will consider individual circumstances to ensure any offer of redress seeks to resolve the complaint and rebuild our relationship with the customer.</p>
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	<p>The remedies we offer are fair, consistent, appropriate, proportionate, and take into consideration the individual circumstances of the complaint.</p> <p>We carefully manage expectations from the outset of their complaint and will offer alternative resolutions where appropriate to do so.</p>
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	<p>Any remedy offered will set out what will happen and by when. We monitor all remedies to ensure these are provided in a timely manner.</p> <p>Where an offer of compensation is made an acceptance form is sent to the customer to enable payment to be made directly to them.</p>
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	<p>We would consider all relevant factors when awarding compensation and this is set out in Section 2.2 of our Complaints Policy.</p>

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	On completion of all complaints we reflect on any learning outcomes to drive forward service improvements. Any relevant learning is assigned and this is monitored through to completion by the Operational Committee.
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	Guidance would be obtained from our legal team to ensure any offers of redress were appropriately worded.

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	Learning from complaints is included in our Annual Report.

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	A member of our Board is the appointed lead on complaints. They are responsible for ensuring the Board receive regular updates on complaint performance.
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • 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. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>The Corporate Management Team (CMT) receive weekly updates on individual complaints.</p> <p>Complaints data, performance and learning outcomes are reported to the Operational Committee, quarterly and they then update the Board in respect of complaint performance.</p> <p>Performance data produced by the HOS is shared with the Board, along with any determination outcomes.</p> <p>The Board are responsible for the approval of the Complaints Policy and Procedure and the annual self- assessment.</p>
7.5	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.	Yes	<p>Trends in complaints are monitored to identify any potential issues arising or risks to the business. This data is reported to CMT and Operational Committee.</p> <p>Determination outcomes received from the HO are shared with relevant managers to ensure active learning.</p> <p>We also review determinations against other social landlords to help us learn from these outcomes.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.6	<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"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>Employees works collaboratively to help resolve complaints so that we can achieve the right outcomes for customers.</p> <p>The business takes collective responsibility for any identified failings and we aim to ensure adequate redress is provided.</p>

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	An annual self-assessment with the HOC is undertaken as standard however, any changes to the HOC or Complaint Policies and Procedures will instigate a further self-assessment.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As above.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • 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 • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance. 	Yes	We report the outcome of the self-assessment to the Board and publish details of this on our website.