**Appendix 1 – Compliant Handling Guide - Self-Assessment Form**

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

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**  |
|  **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 | This definition is contained within our complaints policy.  |
| **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 | Our policy states that we will try to resolve any issues informally as quickly as possible. We take issues raised by a resident, third party or representative through the complaints process if it fits the complaints definition where identified. |
| **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 | Our policy states if a resident is not happy with our attempts to resolve an issue then they may pursue a formal complaint.  |
| **1.7**  | A landlord must accept a complaint unless there is a valid reason not to do so.  |  Yes | Our Complaints Policy sets out exemptions |
| **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 | Our Complaints Policy sets out exemptions |
| **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 | An explanation is provided in line with the exceptions set out in our Complaints Policy. We have recently started to include the right to take that decision to the Ombudsman and included this in our Complaints Policy. |

## Best practice ‘should’ requirements

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| **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 | This is included in 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 | An external firm conducts quarterly randomised surveys on our behalf, they send us the dissatisfied residents as soon as the call has been made and we call them back within five working days, at this call an option for a formal complaint is discussed as part of the attempt to resolve the issue.  |

# Section 2 - Accessibility and awareness Mandatory ‘must’ requirements

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| **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 | Our Complaints Policy sets out that residents can contact us through email, by telephone or in person. We have a dedicated email address for residents to raise complaints. Forms are available on our website. Staff will help residents to fill out forms over the phone if required.  |
| **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 | Our Complaint Policy is available on our website. Where residents complain the policy is signposted to them via a link to our website and also explained in our complaints correspondence. Our policy contains information on our two stage complaints process and timeframes for responding.  |
| **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 | This information is contained in the feedback tab within the for residents tab on our website.  |
| **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.  |  Partial  | ACTION: Complaints handlers need equality act training. We have an Equality, Diversity and Inclusion Policy for residents which is referenced in the complaints policy.  |
| **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 | This information is contained in the summer 2022 issue of our newsletter, Pioneer Press, issues to all residents and will continue to be a dedicated section in all future issues. ACTION: once policy is approved by the board and uploaded onto the website, a section on HOS contact details will be added |
| **2.7**  | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.  |  Yes | Contact information for the Ombudsman is contained in the summer 2022 issue of Pioneer Press and will continue to be a dedicated section in all future issues. Our policy states that residents can seek advice from the ombudsman at any stage and contact information is provided in the final response when a complaint has completed our internal process. This is on the website. |
| **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 | Complaints Policy refers to HOS and their right to contact them at any time. This information is also in our newsletter. Complaint letter templates have this information at all stages.ACTION: once policy is approved by the board and uploaded onto the website, a section on HOS contact details will be added.  |

## Best practice ‘should’ requirements

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**  |
|  | Where a landlord has set up channels to communicate with its residents via social media, then it should expect  |  | We do not communicate with residents via social media so this does not apply.  |
| **2.2**  | 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.  |  No |  |

# Section 3 - Complaint handling personnel Mandatory ‘must’ requirements

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| **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 Resident Engagement & Resolution Officer who is managed by the Director of Housing will lead on complaints handling.  |
| **3.2**  | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.  |  Partial | A new resident engagement and resolutions officer has been trained internally by the Interim Director and through reviewing training material on the NHF and Ombudsman’s website. Further external training is being made available in the new year. ACTION: Additional independent training to be provided for the complaint handler.  |

## Best practice ‘should’ requirements

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**  |
| **3.3**  | Complaint handlers should: * 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 | WPH is a small organisation with embedded cross team working approaches. All Officer, Managers and Directors have had recent complaint handling training. New staff are trained as they are recruited. We provide regular difficult conversations training for all customer facing staff.  |

# Section 4 - Complaint handling principles

## Mandatory ‘must’ requirements

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**  |
| **4.1**  | 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**.  |   **Yes** | Our complaints policy states that we will try to resolve any issues informally as quickly as possible. However, if a resident is not happy with our attempts to resolve the issue then they may pursue a formal complaint. We do not have extra named stages without our policy. Complaints are acknowledged and logged at stage one within five days of receipt. If this doesn’t occur this is reflected in our KPIs. |
| **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** | We have reviewed the format of our acknowledgements which now include our understanding of the complaint and any outcomes the resident is seeking. We ask a resident to fill out a form with both these elements ask them to clarify aspects of the complaint that may be unclear so that we can have a full understanding.  |
| **4.6**  | A complaint investigation must be conducted in an impartial manner.  |   **Yes** | Our complaints policy states that at all stages complaints will be considered fairly and impartially. All staff involved in complaints handling received recent training and new staff are trained as part of their induction |
| **4.7**  | The complaint handler must: * 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** | All staff involved in complaints handling received complaint investigation training. |
| **4.11**  | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication  |   **Yes** | Our complaints policy states that staff will help complainants and make reasonable adjustments in line with the Equality Action 2010 to enable residents to access the complaints process. We also seek to agree contact arrangements with residents if they request it.  |
| **4.12**  | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: * set out their position
* comment on any adverse findings before a final decision is made.

 |   **Yes**  | Residents are given the opportunity to reply to letter within a month if they are dissatisfied with the position. Where a resident or staff member is the subject of a complaint they are interviewed by the complaint handler so that they are able to set out their position and comment on any adverse findings before a final decision is made.  |
| **4.13**  | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint  |   **Yes**  | Our complaint policy states that residents may ask to escalate to stage two within one month of receiving the stage one response.  |
| **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** | The policy includes reasons for declining to escalate a complaint and this is the same as the reasons for not accepting a complaint.  |
| **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  | Complaint files are logged.  |
| **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  | Our complaint policy includes a section on unacceptable behaviour and this is will managed in accordance with our Unacceptable Behaviour policy.  |

## Best practice ‘should’ requirements

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| **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 | When acknowledging a complaint we may note if a desired outcome is unrealistic if it is not in line with our policies. Our complaint policy states that at any stage of a complaint, we may suggest a telephone discussion or meeting with a resident if this seems to be the best way to reach a good solution |
| **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  | Our complaints policy states that our aim throughout this procedure is to try and work with residents to resolve complaints as quickly and effectively as possible. Complaint handlers will identify if there are any urgent actions required when they receive the complaint.  |
| **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 | We accept residents requests if they want to have a representative deal with their complaint on their behalf provided we have written permission from the resident. |
| **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 |  Where an issue in a complaint relates to legal obligations the complaint handler will seek advice from senior management before responding. |
| **4.9**  | Communication with the resident should not generally identify individual members of staff or contractors.  |  Partial | If staff are identified in complaint responses, job titles are used and individual contractors are not identified. WPH is a small organisation so staff may be identifiable from their job titles.ACTION: To implement this further checking that there is no reference to individual members or contractors, as part of auditing.  |
| **4.10**  | Landlords should keep residents regularly updated about the progress of the investigation.  |  Yes  | Where appropriate the resident is updated by email, call or a visit depending on the issue of their complaint.  |
| **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 | Residents are asked to compete a short survey with their feedback on the process after a complaint has completed our internal process.  |
| **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 | The Complaints Policy has the Officer leading on the resolution at stage 1 supported by a formal response from their line manager. Directors share any learning from complaints with their teams. Complaints are also reviewed at management meetings.  |
| **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 | As stated in Unacceptable Behaviour Policy. |

# Section 5 - Complaint stages

## Mandatory ‘must’ requirements Stage 1

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**   |
| **5.1**  | Landlords must respond to the complaint **within 10 working days** 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  | Our complaints policy states that we acknowledge and log a complaint within 5 working days of receiving it, and respond within 10 working days of the acknowledgement. Timescales are sometimes extended by 10 working days if additional investigation is required to reach a complaint decision and residents are kept informed if this is the case.  |
| **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 | We respond to complaints when the answer to the complaint is known and any outstanding actions from the response are included on a complaint action tracker which is accessible to all staff so progress on all complaints are monitored.  |
| **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 | Our understanding of the complaint is contained in the response letter so that all points can be addressed with clear reasons for any decisions made with reference to our internal policy, law and good practice. . Working across teams is sometimes needed if a complaint includes issues that involve different departments.  |
| **5.8**  | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: * 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  | The stage one response letter includes all these elements.  |

## Stage 2

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| **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  | Where residents state they are dissatisfied with all or part of their complaint, they are sent a Stage two form to establish which issues at stage one have not been resolved. We do not generally decline to escalate a complaint but if this were to happen we will communicate our reasons in writing and provide the resident the contact details to approach the Ombudsman |
| **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 | We have reviewed the format of our acknowledgements which now include our understanding of the complaint and any outcomes the resident is seeking. We ask a resident to fill out a form with both these elements ask them to clarify aspects of the complaint that may be unclear so that we can have a full understanding. |
| **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 | Details of how to escalate a complaint are provided on the stage one response letter and the resident is asked to contact us if they would like to escalate their complaint. |
| **5.12**  | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.  |  Yes | Our complaints policy will be responded to by a manager at stage one and Director at stage two. Our policy will state where a Director has responded to a complaint at stage one, as different Director will respond at stage two.  |
| **5.13**  | Landlords must respond to the stage two complaint **within 20 working days** 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 | Our complaint policy states that we acknowledge and log a complaint within 5 working days of receiving it, and a response will be provided to the complaint within 20 working days of acknowledgement. Timescales are sometimes extended by 10 working days if additional investigation is required to reach a complaint decision |
| **5.16**  | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:  * 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 **and**
* 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  | The stage two response letter includes all these elements.We have a two-stage complaints procedure. Stage two final response letters include the contact details of the Housing Ombudsman for the resident to contact if they remain dissatisfied.  |

## Stage 3

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| **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.  |  NA |  We have a two stage policy. |
| **5.20**  | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: * 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  |  NA |  We have a two stage policy. |

## Best practice ‘should’ requirements Stage 1

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| **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 | If an extension is beyond 20 working days to enable us to respond to the complaint fully then this will be explained and a new timescale agreed with the resident.  |
| **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  | Extensions beyond 20 working days are rare and we have not have been in a situation where an extension period cannot be reached with a resident. If this does happen in future then we will provide the Housing Ombudsman contact details.  |
| **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 |  As part of complaints handling training staff are informed this is best practice. |
| **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  | If a resident requests to add further complaints, these will be considered within the response if they are relevant to the original complaint made and the stage one response has not issues yet. where a stage one response has been issued or it would unreasonably delay the response, it will be logged as a new complaint.  |

## Stage 2

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**   |
|  | If an extension beyond 10 working days is required to enable the  |  |  |
| **5.14**  | landlord to respond to the complaint fully, this should be agreed by both parties.  |  Yes  | If an extension is beyond 20 working days to enable us to respond to the complaint fully then this will be explained and a new timescale agreed with the resident. |
|  | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact  |  |  |
| **5.15**  | details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response  |  Yes  | Extensions beyond 20 working days are rare and we have not have been in a situation where an extension period cannot be reached with a resident. If this does happen in future then we will provide the Housing Ombudsman contact details. |

## Stage 3

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| **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 **within 20 working days** 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 have a two stage policy. |
| **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 |  We have a two stage policy. |

# Section 6 - Putting things right

## Mandatory ‘must’ requirements

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| **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  | Yes, residents are asked what they would like us to do to put things right at both stages of the complaint procedure.  |
| **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  | We offer residents practical remedies to their complaints as well as compensation where applicable. |
| **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  | This is set out in our response letters at both stages and remedies are tracked through to completion within our complaint action tracker.  |
| **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 | We refer to our Compensation and Loss of Amenity Policy and HOS guidance on calculating financial redress |

## Best practice ‘should’ requirements

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| **Code section**  | **Code requirement**  | **Comply:** **Yes/No**  | **Evidence, commentary and any explanations**   |
|  | Landlords should look beyond the circumstances of the  | Yes  |  |
| **6.3**  | individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents.  |   | We use complaints to inform any improvements made to our processes or systems. |
|  | In some cases, a resident may have a legal entitlement to  |  |   |
| **6.7**  | redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.  |  Yes | Dealt with on a case by case basis |

# Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **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 | We operate with transparency by writing to residents and sharing the lessons learned and internal changes made following their complaint. This provides a level of assurance to residents that issues will not continue to happen and rebuild a rapport.RESP – Our Resident Engagement and Scrutiny Panel or RESP actively engage with Governance and our Chief Executive by scrutinising all operations and conduct within the organisation including and relating to complaints. Complaint reports are sent to the RESP each quarter. RESP members offer independent advice on how we can improve on our services particularly in relation to complaints and the thoughts of other residents.HASC, who has delegated decision making authority from the board also view complaints reports quarterly.Our annual report 2022 included information on the number of complaints we received in the year and how many were resolved at stage 1.The next issue is in 2023 and our learning and improvements from complaints will be included in next year’s issue |

**Best practice ‘should’ requirements**

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| **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 | The Complaints policy states a board member will be the lead for complaints.The Chair of the Homes & Services Committee is the Board lead for complaints, and is now meeting with the CEO at least every 2 months to discuss complaints.  |
| **7.4**  | As a minimum, governing bodies should receive: * 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 |  These reports are seen by HASC and reported on quarterly to the board. |
| **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 | The Resident Engagement & Resolution Officer presents information on complaints covering these point if applicable quarterly to the middle and senior management team.  |
| **7.6**  | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: * 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.
 |  No | This is not currently included in staff objectives.Action: Include wording in the procedures for complaint handling and ensure all staff are trained in complaint handling and this approach |

# Section 8 - Self-assessment and compliance Mandatory ‘must’ requirements

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| --- | --- | --- | --- |
| **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  | We will carry out the self-assessment every year to ensure we continue to remain in line with the code. The September 2023 review was completed in November due to a restructure. Next review is due November 2024. |
| **8.2**  | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.  |  Yes | A recent restructure has taken place and the code has been reviewed in November 2023 as a result |
| **8.3**  | Following each self-assessment, a landlord must: * 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 | The outcome of our self-assessment will be reported to Board 5th December. This will be reported to residents via the website in the New Year and the annual report in June.  |