

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	<p>Under section 3.1. of the Complaints & Compliment Policy:</p> <p><i>A complaint is where a Housing Solutions resident or other person affected by our services raises an expression of dissatisfaction (however made) about the standard of service or about the action/inaction (or that of others acting on our behalf), which affects an individual resident or group of residents.</i></p>	Our Complaints & Compliments Policy reflects the Code definition.
1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>In addition to the definition of a complaint included at section 3.1 of our Complaints & Compliments Policy, under section 4.1 of the Policy we state:</p> <p><i>A complaint may be made by anyone affected by the services provided by Housing Solutions. Residents may make a complaint through a representative acting on their behalf.</i></p> <p>We include further guidance on who is defined as a 'representative' at section 3.4 of the Policy.</p>	Our Complaints & Compliments Policy and practice reflects this Code requirement. We proactively log all dissatisfaction as complaints.
1.4	<p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not</p>	Yes	<p>Section 3.2 of our Complaints & Compliments Policy provides clear guidance on the distinction between a service request and a complaint which reflects the Code's requirements at paragraph 1.4.</p>	Our Complaints & Compliments Policy reflects the Code requirement.

	complaints, but must be recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Our practice is to log a complaint at the point of any dissatisfaction expressed in accordance with section 1.3 of our Policy, including where a matter was initially raised as a service request.	Our practice reflects this Code requirement.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Our transactional, most recent repair, new let and ASB case management surveys provide information to dissatisfied residents on how to raise a complaint.	Our surveys reflect this Code requirement.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>We welcome all feedback as an opportunity to improve our services as reflected in section 1.1 of our Policy. We therefore welcome complaints and apply exclusions (section 4.2) under our Policy in exceptional cases, making adjustments on account of vulnerability as necessary. Each case is assessed on its merits. Where a complaint is not accepted the decision must be taken by a senior manager (section 4.2).</p> <p>Section 6.3 of our Policy confirms that we will not unreasonably refuse to escalate a complaint through our process.</p> <p>Where a complaint is not accepted we record in full the reasons for this and advise the resident accordingly. We provide information to the resident about the Housing Ombudsman service at this stage.</p>	Our Policy & practice reflect this Code requirement.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Yes	<p>Section 4.2 of our Policy sets out the basis for excluding any complaint. This includes :-</p> <ul style="list-style-type: none"> (sections 4.2.6 & 5.2) a complaint where the issue giving rise to the dissatisfaction occurred over 12 months previously; 	Our Policy reflects this Code requirement.

	<ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		<ul style="list-style-type: none"> • (section 4.2.2) where legal proceedings have started; and • (Section 4.2.1 where the substance of the complaint has already been addressed under the Policy. 	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	All complaints are accepted unless excluded under section 4.2 of our Policy including sections 4.2.6 & 5.2) a complaint where the issue giving rise to the dissatisfaction occurred over 12 months ago. Section 5.2 also confirms that we may accept a complaint outside this period in exceptional circumstances. This would take into account the reason(s) for delay and any vulnerabilities of the resident. Section 6.3 of our Policy confirms that we will not unreasonably refuse to escalate a complaint through our process.	Our Policy & practice reflect this Code requirement.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	As above, in exceptional circumstances, the complaint may be reviewed by a senior manager and a decision taken that it is not appropriate to escalate the complaint. In this instance a full explanation is provided to the complainant with details of the Housing Ombudsman should they be dissatisfied with our decision in accordance with section 5.5 of our Policy.	Our Policy reflects this Code requirement.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	We welcome all feedback as an opportunity to improve our services as reflected in section 1.1 of our Policy. We therefore welcome complaints and apply	Our Policy & practice reflect this Code requirement.

			exclusions (section 4.2) under our Policy in exceptional cases, making adjustments on account of vulnerability as necessary. Each case is assessed on its merits.	
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Under section 5.1 of our Policy complaints can be made in person, by phone, by email, by webchat, through our website or in writing to any member of Housing Solutions staff.</p> <p>Under section 14.1 of our Policy we confirm that we will make adjustments to our Policy & communications on account of a health, language or any other additional/particular need. We explore the need for this with individual residents on initial acceptance & acknowledgement of the complaint.</p> <p>Under section 2.3 of our Policy we also fully consider resident vulnerability when handling service requests.</p>	Our Policy & practice reflect this Code requirement.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Under section 5.1 of our Policy complaints can be made in person, by phone, by email, by webchat, through our website or in writing to any member of Housing Solutions staff.</p> <p>All Housing Solutions staff are aware of the complaints process & our dedicated Complaints team provide training at induction of new starters and on any changes to our policy, process or the Code. Regular training is provided to all</p>	Our Policy & practice reflect this Code requirement.

			staff on an ongoing basis to support awareness & adherence to our Policy.	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We welcome all feedback as an opportunity to improve our services as reflected in section 1.1 of our Policy. As above, we exclude complaints under our Policy only on an exceptional basis. We welcome complaints as an opportunity to draw learning and insight from our residents on their customer experience when transacting or communicating with Housing Solutions.	Our approach reflects this Code requirement.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Our Complaints & Compliments Policy is available on our website together with other information on making a complaint, including through the website. Policies - Housing Solutions Maidenhead Comments, Compliments and Complaints - Housing Solutions Maidenhead We also publicise our Policy to new residents as part of our resident onboarding process.	Our approach reflects this Code requirement.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Our Policy advises at section 1.1 that it is published on our website and that the Policy supports our compliance with the Code. We give information about the Housing Ombudsman & Complaint-Handling Code at sections 4.2.1, 5.6, 6.1 (stage 1), 6.2 (stage 2) and 6.3 (Escalation) of the Policy.	Our Policy reflects this Code requirement.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	We state at section 3.4 of our Policy that residents may have a representative with them at a meeting under the Policy to discuss their complaint and/or provide support. We state at section 4.1 that the representative can make a complaint on	Our Policy reflects this Code requirement.

			the complainant's behalf. We give guidance on whom the representative might be at section.	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	We give information about the Housing Ombudsman & Complaint-Handling Code at sections 4.2.1, 5.6, 6.1 (stage 1), 6.2 (stage 2) and 6.3 (Escalation) of the Policy.	Our Policy reflects this Code requirement.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a specialist, dedicated Complaints Team in place handling all complaints at stage 1 of our process and supporting responses to complaints at stage 2 of the process. The team carries out this function and provides monthly reports to senior managers and quarterly reports to our Executive Team on all aspects of our complaint-handling and service.	Our approach reflects this Code requirement.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Our Complaints Team consists of two full-time colleagues who have direct access to colleagues at all levels of the organisation to facilitate the prompt resolution of complaints. The Team directly resolves complaints at stage 1 of our process with the appropriate authority to do so. The Team leads on lessons learned for the organisation arising from the complaints we receive.	Our approach reflects this Code requirement.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	The introduction of our dedicated Complaints Team in June 2023 was to help embed a culture of best practice complaint-handling in the organisation and ensure quality complaint-handling for residents. We report regularly to senior managers and our wider Leadership Team on complaint outcomes & learning and to our MCR and Board annually. Our Complaints Team leads on lessons learned for the organisation arising from the complaints we receive and delivers	Our approach reflects this Code requirement.

			training on complaint-handling to new starters as part of our corporate and all teams on a regular basis. The Team is fully supported & appropriately resourced in this role	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Our Complaints & Compliments Policy is our single, comprehensive policy on complaint-handling.	Our Policy reflects this Code requirement.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Any expressed dissatisfaction is logged as a complaint at stage 1 of our Policy, as defined under section 3.2 : 'Stage 1 complaint: a new complaint raised with Housing Solutions of dissatisfaction from a resident or other person receiving services from Housing Solutions where a response is normally provided within 10 days...'	Our Policy reflects this Code requirement.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Following consultation with our involved residents and colleagues, we amended our Policy on 6 March 2024 to include a maximum of two stages in our complaints process. Prior to this our involved residents had wished to retain a third stage. We have included key features of our former third stage (such as the opportunity to have the complaint reviewed in person with a resident representative and Member Responsible for Complaints (MRC) who is the Senior Independent Director on	Our Policy and approach reflects this Code requirement.

			our Board) in our revised second stage of the process.	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Our complaints process has a maximum of two stages. We do not involve third parties such as contractors in complaint-handling, if a relevant situation arose we would seek information from them. We seek support from independent external mediators in complex cases with the resident's agreement. Again our complaints process would be a maximum of two stages.	Our practice and approach reflects this Code requirement.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We respond to all complaints involving Housing Solutions' services, work or activity directly, with input from third parties where relevant and appropriate. Please see above response at 5.4. Any complaints made directly to a contractor are required to be reported to us by the contractor within our Policy timescales for logging and resolution in accordance our process.	Our practice and approach reflects this Code requirement.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	In accordance with section 6.1 of our Policy, when we acknowledge complaints, our Complaints Team makes contact with the complainant to discuss & understand the complaint prior to its investigation and the preferred resolution. Clarification is requested if needed at this stage. The discussion is confirmed in our stage 1 templated acknowledgement letter. The same approach is taken at stage 2 of our process (section 6.2), albeit that the complainant does not need to specify why they wish to escalate their complaint.	Our Policy and practice reflect this Code requirement.

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	This forms part of our approach under the response to 5.6 above.	Our Policy and practice reflect this Code requirement.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Our specialist Complaints Team handles all stage 1 complaints directly and adopts this approach in complaint-handling. Their role is to provide support to senior managers in responding to stage 2 complaints in the same way.	Our practice & approach reflects this Code requirement.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	If it becomes clear that it is not possible to respond to a complaint within our stage 1 and stage 2 timescales, we will give the resident an indication of when we expect to be able to provide a response and seek to agree this with the resident. An extension would be limited to 10 working days and confirmed in writing with contact details for the Housing Ombudsman given (sections 6.1 & 6.2 of our Policy).	Our Policy reflects this Code requirement.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	We commit to making reasonable adjustments to our complaints process under section 14.1 of our Policy. This includes adjustments relevant to health, language or any other additional/particular need. We explore the need for this with individual residents on initial acceptance & acknowledgement of the complaint. Under section 2.3 of our Policy we also fully consider resident vulnerability when handling service requests.	Our Policy reflects this Code requirement.

5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		Under section 6.3 of our Policy we confirm that we will not unreasonably refuse to escalate a complaint through all stages of our complaints process, except where a decision is taken by a senior manager that the complaint is excluded. In this instance, a full explanation is given to the complainant within contact details for the Housing Ombudsman (6.3).	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Full records of complaints and associated communications are uploaded onto to our secure document management system. Training is provided to all new starters and staff on this and we issue regular reminders with guidance on the importance of full and accurate record-keeping in accordance with the Housing Ombudsman's Spotlight on Knowledge Management and associated self-assessment.	Our practice & approach reflects this Code requirement.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Under the 'roles & responsibilities' section of our Policy (section 3) employees have a responsibility to resolve complaints at an early stage for the complainant. Our dedicated Complaints Team are authorised and able to resolve stage 1 complaints and provide support to senior managers to resolve complaints at stage 2 of our process. Senior managers have appropriate authority levels in terms of compensation packages under our Group Standing Orders (March 2024).	Our Policy & practice reflect this Code requirement.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for	Yes	We have an Unacceptable Customer Behaviour Policy which is published on our website Policies - Housing Solutions Maidenhead setting out our approach to	Our Unacceptable Customer Behaviour Policy reflects this Code requirement.

	putting any restrictions in place and must keep restrictions under regular review.		managing challenging, unreasonable or unacceptable behaviour from residents. The Policy extends (section 1.1) to behaviour by third party representatives or advocates acting on a complainant's behalf. Documentary evidence of all restrictions applied is held on our document management system and restrictions are regularly reviewed to ensure ongoing fair processing of information.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our Unreasonable Customer Behaviour Policy contains safeguards in the way it is applied to ensure that does not have a discriminatory effect. The Policy includes a mechanism for appeal against any action taken at senior level, the appeal being dealt with by a Director of Housing Solutions.	Our Unacceptable Customer Behaviour Policy reflects this Code requirement.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Our Complaints Team triages complaints received at stage 1 of our process to ensure prompt responses to complaints, in all cases having regard to the complexity of the complaint following initial scoping & acknowledgement with the resident. That scoping takes into account known or declared vulnerability on the part of the complainant.</p> <p>Section 3.2 of our Policy contains a clear definition of a service request which employees are required to address & resolve at first point of contact under our Policy.</p> <p>Our average response time for concluding stage 1 complaints over 2023/24 was 7.8 days, within our 10 working day timeframe.</p> <p>Our average response time for concluding stage 2 complaints over 2023/24 was 12.3 days, within our 20 working day timeframe.</p>	Our Policy, practice & approach reflects this Code requirement.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Under section 6.1 of our Policy, our Complaints Team contacts the complainant to acknowledge the complaint within 5 working days, to discuss the elements of the complaint	Our Policy reflects this Code requirement.

			and the desired outcome. If any aspect is unclear, we seek clarification at that stage. This initial contact is followed up in writing within this timeframe.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Under section 6.1 of our Policy, our Complaints Team aims to respond to the complaint in full within 10 working days from our initial acknowledgement, to discuss the elements of the complaint and the desired outcome. Our average response times for concluding stage 1 complaints over 2023/24 was 7.8 days, within our 10 working day timeframe.	Our Policy & practice reflects this Code requirement.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	If the complaint is complex we will contact the resident and agree an extension of time to resolve the complaint of no more than a further 10 working days. The extension and reasons for it are confirmed to the complainant in writing and contact details given for the Housing Ombudsman. We have not extended complaint outcomes beyond a further 10 working days.	Our Policy & practice reflects this Code requirement
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	As responded within 6.4 above, the extension and reasons for it are confirmed to the complainant in writing and contact details given for the Housing Ombudsman.	Our Policy & practice reflects this Code requirement
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and	Yes	We provide full responses to complaints when a resolution has been agreed within the relevant stage 1 or stage 2 timeframe. Any ongoing or follow-up action(s) are logged & tracked by our	Our practice & approach reflects this Code requirement.

	actioned promptly with appropriate updates provided to the resident.		Complaints Team to ensure their timely completion.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our template letters at both stage 1 and 2 of our complaints process require these elements to be covered.	Our practice reflects this Code requirement.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Unless a final complaint response letter has been issued, any additional complaint element is incorporated into the existing investigation and subsequent outcome. Any fresh matters raised are logged and taken forward as a new complaint.	Our practice reflects this Code requirement.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	These requirements are built into our stage 1 templated complaint outcome letter.	Our practice reflects this Code requirement

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 6.3 of our Policy confirms that we will not unreasonably refuse to escalate a complaint through our process. In exceptional circumstances, the complaint may be reviewed by a senior manager and a decision taken that it is not appropriate to escalate the complaint. In this instance a full explanation is provided to the complainant with details of the Housing Ombudsman should they be dissatisfied with our decision in accordance with section 5.5 of our Policy.	Our Policy reflects this Code requirement.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Under section 6.2 of our Policy requests to escalate a complaint to stage 2 of our process are acknowledged within 5 working days of receipt.	Our Policy reflects this Code requirement.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Section 6.2 of our Policy goes on to provide that complainants will be asked to outline the elements of the stage 1 outcome they remain dissatisfied with, but that they are not obliged to provide this information.	Our Policy reflects this Code requirement.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 6.2 of our Policy provides that: 'The stage 1 response, and any new or relevant information not previously considered, will be reviewed by a Senior Manager who has not been involved at Stage 1 with support from the Complaints team'.	Our Policy reflects this Code requirement.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Under section 6.2 of our Policy, a full response to the complaint must be provided within 20 working days of our initial acknowledgement.	Our Policy reflects this Code requirement.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Section 6.2 of our Policy goes on to state that: 'Under exceptional circumstances we may need to agree an extended timeframe with the resident. This should not exceed a further 20 working days'.	Our Policy reflects this Code requirement.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 6.2 of our Policy also states that: 'The extension and reasons for it will be confirmed in writing and contact details for the Housing Ombudsman given'.	Our Policy reflects this Code requirement.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	As stated under 6.6 above, we provide full responses to complaints when a resolution has been agreed within the relevant stage 1 or stage 2 timeframe. Any ongoing or follow-up action(s) are logged & tracked by our Complaints Team to ensure their timely completion.	Our practice & approach reflects this Code requirement.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	As stated under 6.6 above, our template letters at both stage 1 and 2 of our complaints process require these elements to be covered.	Our practice & approach reflects this Code requirement.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	These requirements are built into our stage 2 templated complaint outcome letter.	Our practice reflects this Code requirement.

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Under section 6.2 of our Policy we confirm that stage 2 is the end of our complaints process. Our stage 2 process provides for the complaint to have the option of their complaint being reviewed either by a senior manager or by a resident representative and a Board member who will generally be our MRC.	Our Policy reflects this Code requirement.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	These elements are built into either our Complaints & Compliments Policy or our standard template letters. Our complaint learning Toolkit reflects a proactive approach to extract learning from all complaints made to Housing Solutions, regardless of the outcome. We are committed to strengthening our approach to embedding the Toolkit more fully across the organisation to extract learning from every complaint and ensure necessary improvements are made to our services & offer to residents to avoid issues recurring.	Our Policy & practice reflect this Code requirement.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		The Complaints Team works to ensure that the impact of service failure or other	

			<p>failings relevant to the complaint are reflected in the complaint outcome. The Team supports senior managers in ensuring these considerations are met within stage 2. All upheld complaints include a personal apology to the complainant as a minimum. All stage 2 outcome letters are reviewed at Assistant Director level.</p> <p>All complaint outcome letters follow the Housing Ombudsman templates.</p> <p>Our Complaints & Compliments Policy is supplemented by our Compensation Policy & Staff Guidance covering the range of remedies that must be considered, including compensation bandings, as part of complaint outcomes.</p>	Our policies reflect this Code requirement.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	All complaint outcome letters reflect these requirements and follow the Housing Ombudsman templates.	Our practice reflects this Code requirement.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	All complaint outcome letters follow the Housing Ombudsman templates.	Our practice reflects this Code requirement.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	All elements are provided as part of our Annual Complaints Report to the Housing Solutions Board. This was last presented on 6 March 2024.	Our practice reflects this Code requirement.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	All elements are provided as part of our Annual Complaints Report to the Housing Solutions Board. This was last presented on 6 March 2024. The Report is being published on our website together with the Board's response to the Report.	Our practice reflects this Code requirement.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We would adhere to this in the event of a restructure, merger or significant change in our procedures.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We have not been requested to revisit our self-assessment against the Code following any investigation but would	

			action this promptly in response to such a request.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We have not experienced such an incident but would take these steps promptly if this were to arise.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>We have a complaint learning Toolkit in place which includes individual complaint feedback forms capturing learning from all complaints regardless of outcome. Actions will be agreed with relevant line managers and then monitored for completion by the Complaints Team with status updates provided on a monthly basis to senior managers & to the Executive Team quarterly.</p> <p>We report regularly to senior managers and our wider Leadership Team on complaint outcomes & learning and to our MCR and Board annually.</p>	Our practice reflects this Code requirement.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Our dedicated Complaints Manager is responsible for leading on embedding a positive and proactive complaint-handling culture.</p> <p>As commented under 91 above, we have a complaint learning Toolkit in place which includes individual complaint feedback forms capturing learning from all complaints regardless of outcome. Actions will be agreed with relevant line managers and then monitored for completion by the Complaints Team with status updates provided on a monthly basis to senior managers & to the Executive Team quarterly.</p>	Our practice reflects this Code requirement.

			We report annually on complaint themes and learning to our MRC and Board annually.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Our performance in complaint-handling and areas of improvement was discussed with our principal involved resident group on 29 Sept 2023. A 'deep dive' complaint review session was held with the Chair of our principal involved resident group, our Member Responsible for Complaints (MRC) and senior managers/complaint handlers on 7 December 2023 where learning was shared from complaints and improvements were discussed.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Our dedicated, specialist Complaints Manager undertakes this role for Housing Solutions, including taking a lead role in our complaint learning Toolkit application. Our Complaints Manager reports to our Assistant Director of Governance & Corporate Compliance.	Our complaints service & resourcing reflects this Code requirement.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Our Member Responsible for Complaints is our Board Senior Independent Director.	Our practice reflects this Code requirement.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Our Member Responsible for Complaints is our Board Senior Independent Director. Our MRC has supported the majority of our escalated complaint reviews over recent years. They attended a 'deep dive' complaint review session with the Chair of our principal involved resident group and senior managers/complaint handlers on 7 December 2023. The purpose of this	Our practice reflects this Code requirement.

			session was to share and report their findings and feedback from handling escalated complaints to help improve our services and complaint-handling.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>All elements are provided as part of our Annual Complaints Report to the Housing Solutions Board. This was last presented on 6 March 2024. We also report to the Board bi-annually on our complaints performance and as and when required in respect of any specific issues/risks arising and Housing Ombudsman engagement/decisions.</p>	Our reporting reflects this Code requirement.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>The performance of our Complaints is assessed by reference to these requirements in relation to complaint-handling. All Housing Solutions staff are required to demonstrate our core values and behaviours in their work including any aspects of complaint-handling. These include teamwork, inclusion and ownership.</p>	