

Housing Ombudsman Complaint Handling Code:

Self-assessment form 2022/23

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	Under section 3.1. of the Complaint & Compliment Policy: <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>
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	Under section 4.1 of the Complaint & Compliment Policy: <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>
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	Under section 3.2 of the Complaint & Compliment Policy complaints are categorised as follows: <ul style="list-style-type: none"> • <u>Service request</u>: an expression of dissatisfaction which may be resolved by offering an early solution or explaining the reason behind the dissatisfaction. An example would be a resident who telephones to report that a contractor has failed to meet an appointment slot and Housing Solutions are able to arrange an alternative appointment at a time convenient to the resident, which resolves the service request. The monitoring of service requests will help Housing Solutions understand issues that could escalate if not dealt with at an early stage.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			<ul style="list-style-type: none"> <u>Complaint</u>: an expression of dissatisfaction that is not able to be resolved as a service request and which therefore requires investigation and a full response to be issued.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	The Complaint & Compliment Policy covers: Section 4.1 - Who can complain Section 4.2 - Excluded complaints
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	Sections 4.2 & 4.3 of the policy set out the circumstances whereby the complaints process may not apply, including a resident's recourse should they remain dissatisfied.
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	Section 6.5 provides that a detailed explanation will be provided.

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	Section 3.2 of the policy provides details of how complaints are categorised.
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	For internally-produced surveys, feedback is logged in line with policy and procedures and followed up as necessary. For externally-led surveys, advice is given to direct complaints to either the website or the Complaints team.

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	Section 5.1 of the Policy states: Complaints and compliments can be made in person, by phone, by email, by webchat, by website or in writing to any member of Housing Solutions staff. Upon receiving the complaint via the resident's chosen method, Housing solutions will log the complaint on the resident's housing file and agree an appropriate method for response. All complaints will be dealt with in line with the timescales under this policy. Social media complaints will progress through our Complaint & Compliment policy to maintain confidentiality and privacy.
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	Housing Solutions provides accessible information e.g. in large print and audio, individual translation services and the ability to translate our website content.
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	Yes Our Promise to you (housingsolutions.co.uk) Your Feedback - Comments, Compliments and Complaints (housingsolutions.co.uk)
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	Section 15 of the policy confirms Housing Solutions' commitment to compliance with the Equality Act 2010, and our own Equality, Diversity & Inclusion Strategy and supporting Equality and Diversity Policy. Section 16 of the policy sets out how Housing Solutions will provide adjustments to ensure accessibility and provide appropriate training for staff. We offer reasonable/practical adjustments for residents with additional needs at all stages of the complaints process.

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	The policy is available on our website together with other information on making a complaint. Leaflets are made available for residents and information is included on access to the Housing Ombudsman at all stages of our correspondence with residents. Your Feedback - Comments, Compliments and Complaints (housingsolutions.co.uk) Housing solutions policies leaflet-for-residents-about-the-housing-ombudsman-service.pdf (housingsolutions.co.uk)
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This is communicated to residents when discussing complaints, via our website and at each stage of the formal complaints process, as noted above.
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	See 2.7 above. Housing Ombudsman information is also available on our website, at our Reception and by phone. leaflet-for-residents-about-the-housing-ombudsman-service.pdf (housingsolutions.co.uk)

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	Section 5.1 of the Complaint & Compliment policy confirms that social media complaints will progress through the policy to maintain confidentiality and privacy.

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	Following a restructure of the Customer Service Team, two new dedicated roles have been created, a Complaints Manager and Complaints Co-Ordinator; the new structure is expected to be in place in July 2023.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All staff handling complaints are provided with appropriate training and complete the Housing Ombudsman e-learning modules annually. Where any conflicts are identified, for example complaints about a member of staff, these are recorded & handled by a different manager.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <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	Housing Ombudsman e-learning training for complaint handlers and customer service team completed March - June 2023. Complaint handlers work in line with our policy and procedures.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

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	Section 6.1 of the policy states that stage one complaints will be acknowledged within 5 working days. In addition stage two complaints are acknowledged within 2 working days.
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	Housing Solutions complaint handlers will acknowledge all complaints, at which point the detail of the complaint and desired outcomes are discussed. This also occurs when acknowledging stage two complaints. Further clarity is sought as necessary during the process.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints are currently reviewed by managers and senior managers within their areas. A new team consisting of a dedicated Complaint Manager and Co-ordinator will be in place in July 2023 to further strengthen our complaints service. Support in complaint-handling is available from all areas of the management team as required.

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	All complaint correspondence is saved on our secure document management system, demonstrating the appropriate handling of complaints. The operation and efficacy of our systems and procedures are independently audited and assessed by our internal auditors.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Where arrangements are agreed with residents, they are recorded on our housing management system, which also allows communication preferences to be prioritised in line with residents' requests.
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	During the complaint investigation stage, residents and staff members are given the opportunity to explain their concerns. Findings are discussed before a final written response is provide to the complainant.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Section 6 of the complaints policy provides details of complaint stages and escalation timescales.
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	Guidelines are included under section 4.2 of the policy. Where complaints are refused the resident will be informed of this and the reasons why. This will also be recorded on our document management system.
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	Full records of complaints and associated communications are uploaded onto to our secure document 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	This is covered within our Unacceptable Customer Behaviour policy

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	Residents are asked to outline their desired outcomes from an early stage and at each stage of our complaints process. This enables complaint handlers to manage residents' expectations where they may be unrealistic or unreasonable.
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	Using the HO complaint-handling timescales, the aim is to investigate and resolve complaints quickly and carry out any urgent actions identified as swiftly as possible. Monthly reports are provided to the Executive Team providing information on compliance with our complaints handling timescales.
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	Section 5.1 of the Complaints & Compliments Policy states: <i>Complaints and compliments can be made in person, by phone, by email, by webchat, by website or in writing to any member of Housing Solutions staff. Upon receiving the complaint via the resident's chosen method, Housing solutions will log the complaint on the resident's housing file and agree an appropriate method for response. All complaints will be dealt with in line with the timescales under this policy. Social media complaints will progress through our Complaint & Compliment policy to maintain confidentiality and privacy.</i>
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 issues raised relate to legal obligations, responses to residents clearly set out the understanding of the obligations, for instance, in the case of complaints regarding tenancy or repair responsibilities. Copies of all correspondence are stored on our document management system.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Communication with residents does not routinely identify individual members of staff and contractors are identified under their company name, not as individuals.
4.10	Landlords should keep residents regularly updated about the	Yes	We aim to ensure residents are regularly updated on the

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	progress of the investigation.		progress 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	Transactional satisfaction surveys are issued at the conclusion of each complaint with outcomes reported as part of quarterly KPI reporting.
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	Learning and outcomes are provided to the Executive Team in monthly reports with work carried out across teams to work on required service improvements.
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	Provisions are in line with our Unacceptable Customer Behaviour policy.

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	<p>The Complaints & Compliments Policy reflects the Ombudsman response times, and a stage 1 complaint is expected to be responded to within 10 working days from receipt.</p> <p>From 13/06/2022 to 14/06/2023, of 173 Stage 1 complaints completed, the below is the % breakdown of complaints completed within timescales. In some instances, at the resident's request, complaints have been left open whilst agreed actions are completed, this has impacted on the time taken to close complaints.</p> <table border="1"> <thead> <tr> <th>Timescale for complaint completion</th> <th>June - June 2021/22</th> <th>June - June 2022/23</th> </tr> </thead> <tbody> <tr> <td>10 working days</td> <td>43%</td> <td>73.4%</td> </tr> <tr> <td>15 working days</td> <td>26%</td> <td>12.7%</td> </tr> <tr> <td>>20 working days</td> <td>31%</td> <td>13.9%</td> </tr> </tbody> </table> <p>Whilst there has been improvement in the last 12 months, we recognise that further work is required to respond promptly and within HO guidance. This is being addressed through a number measures, including a new dedicated team comprising a Complaints Manager and Coordinator, who will handle all complaints, working across the organisation to ensure responses are provided within the HO Code timescales.</p> <p>Support from other areas of the business is in place to handle complaints and improve the time taken to respond.</p>	Timescale for complaint completion	June - June 2021/22	June - June 2022/23	10 working days	43%	73.4%	15 working days	26%	12.7%	>20 working days	31%	13.9%
Timescale for complaint completion	June - June 2021/22	June - June 2022/23													
10 working days	43%	73.4%													
15 working days	26%	12.7%													
>20 working days	31%	13.9%													
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	Yes	<p>Full complaint responses are provided for all complaints. Historically, complaints may be left open at the request of a resident whilst works/action are completed, which has resulted in longer response times.</p>												

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	expeditiously with regular updates provided to the resident.		
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	Response letter based on Housing Ombudsman templates are in place. Final response letters are saved on the document management system. Reviews are in place to monitor the content and quality of letters
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	Template letters based on Housing Ombudsman requirements in place. Complaint response letters are saved on our document management system.

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	The policy sets out the escalation route and stage 1 and stage 2 letters include details of how to escalate complaints, including resident's rights 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	Residents are asked to provide areas of the complaint that either remain unresolved or where the resident is unhappy with the resolution, together with the outcome they desire to escalate
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	Our procedure is to escalate the complaint at conclusion of stage 1 (unless one of our policy exclusions apply) and at the request of the resident.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations												
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Escalation from Stage 1 moves the complaint to a Head of Department or Senior Manager												
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	<p>The Policy reflects the Ombudsman response times, and all stage 2 complaints are expected to be responded to within 20 working days from being logged.</p> <p>The table below shows the breakdown of time taken to close the 33 escalated Stage 2 complaints completed from 13/06/2022 to 14/06/2023</p> <table border="1" data-bbox="1267 587 2002 794"> <thead> <tr> <th data-bbox="1267 587 1570 655">Timescale for complaint completion</th> <th data-bbox="1570 587 1756 655">June - June 2021/22</th> <th data-bbox="1756 587 2002 655">June - June 2022/23</th> </tr> </thead> <tbody> <tr> <td data-bbox="1267 655 1570 687">20 working days</td> <td data-bbox="1570 655 1756 687">75%</td> <td data-bbox="1756 655 2002 687">72.7%</td> </tr> <tr> <td data-bbox="1267 687 1570 756">Extended 10 working days</td> <td data-bbox="1570 687 1756 756">5%</td> <td data-bbox="1756 687 2002 756">15.2%</td> </tr> <tr> <td data-bbox="1267 756 1570 794">>30 working days</td> <td data-bbox="1570 756 1756 794">20%</td> <td data-bbox="1756 756 2002 794">12.1%</td> </tr> </tbody> </table> <p>Some of the extended complaints were kept open following agreement of the resolution at the resident's request until the actions were completed fully, this impacted on the time to close complaints.</p>	Timescale for complaint completion	June - June 2021/22	June - June 2022/23	20 working days	75%	72.7%	Extended 10 working days	5%	15.2%	>30 working days	20%	12.1%
Timescale for complaint completion	June - June 2021/22	June - June 2022/23													
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Extended 10 working days	5%	15.2%													
>30 working days	20%	12.1%													
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	Template letters are in place for all stages of the complaints process, these clearly set out the requirements of the Code, including escalation processes and how to raise matters with the Ombudsman												

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	<p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long.</p> <p>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.</p>	Yes	Residents were consulted when the current Complaint & Compliment Policy was being drafted and the HO Complaints Handling Code was first introduced in 2020. Involved residents were supportive of retaining the well-established three stage process.
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three 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 details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	Template letters are in place for all stages of the complaints process, these clearly set out the requirements of the Code, including escalation processes and how to raise matters with the Ombudsman

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	If an extension beyond 20 working days is required, this would always be agreed with the resident. We also ensure details of the HO are provided throughout the complaints process.
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 extension periods cannot be agreed, we provide residents with information and contact details for the Housing Ombudsman.
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	It is standard practice, where the complaint relates to a recurring issue, to consider all matters and background information in coming to a fair & appropriate resolution.
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	Unless a final complaint response letter has been issued, any additional complaint is incorporated into the existing investigation.

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	If an extension beyond 10 working days is required at stage 1 of our process, this would always be agreed with the resident. We provide details of the HO throughout the complaints process.
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 extension periods cannot be agreed, staff provide residents with details of how to contact the Ombudsman.

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 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.	Yes	Residents were consulted when the current Complaint & Compliment Policy was being developed and the HO Complaints Handling Code was first introduced in 2020. Involved residents were supportive of retaining the existing 3- stage process. The stage 3 process concludes with a Complaints Panel. The policy clearly sets out the response times, in line with the Code.
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.	Yes	Where extension periods cannot be agreed, staff provide residents with details of how to contact the Ombudsman.

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	Complaint outcomes are documented within all complaint response letters, reflecting an acknowledgement when something has gone wrong or we could have done something better.
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	The complaint response letters will provide detail of remedies offered in line with the policy. Letters are reviewed prior to sending by the complaint co-ordinator and manager. Audits are carried out to provide further assurance.
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	Complaint letters follow the Housing Ombudsman template to provide detail of the resolutions and timescales.
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	Compensation payments are tracked, including any statutory payments due. A standalone Compensation Policy was approved by our Board on 14 December 2022. The policy clearly sets out the organisation's approach to compensation payments, including statutory payments.

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	Yes	Monthly reports with outcomes are submitted to senior & Executive management teams, alongside recommendations for service

	residents.		improvements.
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	Where a resident may have a legal entitlement to redress and legal proceedings have not started, complaints will be handled in line with the Policy. If the complaint crosses over with legal entitlement, Housing Solutions obtain legal advice.

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	<p>Monthly reports provided to senior and Executive management along with performance information to resident Scrutiny and Improvement team and on our website. An annual deep dive complaints report is also provided to our Board.</p> <p>Complaints performance is reported within the Statutory Accounts, Annual Report and Residents Annual Report.</p>

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	The Senior Independent Director was appointed in June 2022 as the lead Board member. The SID chairs all stage 3 complaint panel meetings.
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 Board receives information regarding complaints, including complaint handling performance. Board received the following over the course of the last year:</p> <ul style="list-style-type: none"> 27th July 2022 – report on self-assessment against the HO Code for 2021/22 together with end of year performance information including complaints handling performance. 21st September 2022 - report on a stage 3 complaint affecting a number of residents, for discussion and approval of offer of redress. 16th November 2022 – mid-year

			<p>performance information including complaints handling performance for Apr-Sept 2022/23. Mid-year performance reporting.</p> <ul style="list-style-type: none"> • 19 July 2023 - annual deep dive complaints report.
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	Yes	Monthly reporting to the Executive Team.
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	The Complaints Policy sets out the role and expectation of all staff in the handling of complaints. Complaints are monitored regularly through detailed reporting and monthly KPI monitoring and reporting.

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	Completed in July 2023 and reviewed and reporting to Board on 19 July 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Following the revisions to the HO Code, a self-assessment was completed and reviewed by Board on 27 July 2022.
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	Following the Board review of the 2022/23 self-assessment on 19 July 2023, the self-assessment will be made accessible to residents. The outcome of the self-assessment will also be reported in the Residents Annual Report.