

## Appendix B – 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

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	The definition is in the Complaints Policy November 2020
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	Informal complaints are now included as complaints
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	If the resident requests a complaint it will be logged
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	

<p>1.8</p>	<p>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.</p>	<p>The exclusions in the current policy are;</p> <p><i>“Areas where individuals may express dissatisfaction which would not be regarded as complaints would relate to;</i></p> <ul style="list-style-type: none"> <li><i>• An initial request for a service e.g. first reporting a repair or if the matter can be resolved informally,</i></li> <li><i>• the general law, unless wrongly applied,</i></li> <li><i>• persons or bodies over which LVRHA has no control,</i></li> <li><i>• Reports about anti-social behaviour (ASB) are not part of this policy as there is a separate ASB Policy,</i></li> <li><i>• LVRHA’s overall policies (e.g. rent levels, allocations policy, maintenance and renewal policies),</i></li> <li><i>• Matters which are, or could reasonably be expected to be the subject of court or tribunal proceedings, or which are in the hands of LVRHA’s insurers.”</i></li> </ul> <p>Section included: If LVRHA decides not to accept a complaint a detailed explanation should be provided to the resident setting out the reasons why the matter is not suitable for the complaints process. A resident has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.</p>
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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	<p>The repeated and/or obsessive pursuit of:</p> <ul style="list-style-type: none"> <li>• Unreasonable complaints and/or unrealistic outcomes,</li> <li>• Continuing to repeat the same issues despite SLH responses, and</li> <li>• Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness.</li> </ul> <p>Where complaints continue and have been identified as persistent or unreasonable in accordance with the criteria above then a director will determine whether it is a persistent or vexatious complaint and will determine the appropriate action to be taken.</p> <p>The Director (Business Assurance) will notify the complainants, in writing, of the reasons why their complaint has been treated as persistent or unreasonable and the action that will be taken.</p>
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	LVRH have a website where customers can email a service request, or they can directly contact the managing agent SLH to discuss their request.
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	Yes	Part of customer insight partner role to identify training.

if they wish to.

## 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	"A complaint can be from a tenant or any other customer. Complaints can be made in person, via email, telephone or via a Councillor, MP or other advocate who has been authorised to make a complaint on their behalf. Complaints can be made online on the LVRH website or the SLH (managing agent website)"
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	Complaints Policy is available on the website under 'Existing Customers' tab.  Need to add a complaints tab to the LVRHA website  The complaints policy details the two stages of complaints and provides information regarding the Housing Ombudsman. Stage 1 – Manager Review Stage 2 – Director review
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	<a href="http://www.lunevalleyhousing.co.uk/existing-customers.html">http://www.lunevalleyhousing.co.uk/existing-customers.html</a> Possibly update the website to include complaints tab.
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	LVRHA is committed to ensuring that disabled people are not disadvantaged in accessing its services or by making a complaint. To this end we will make reasonable adjustments for disabled people. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and:

		<ul style="list-style-type: none"><li>• Confirms our commitment to improving accessibility for everybody that we deal with,</li><li>• Sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people, and</li><li>• Sets out the factors that we will take into account in dealing with requests for reasonable adjustments.</li></ul> <p>Many of the arrangements that we offer for disabled people can also be made available for those who do not have disabilities. For example, provision of documents in larger font than our usual font.</p> <p>To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. Examples of this include:</p> <ul style="list-style-type: none"><li>• Allowing more time than we would usually for someone to provide information that we needed,</li><li>• Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event,</li><li>• Communication through a representative or intermediary,</li><li>• Rest or comfort breaks in meetings.</li></ul> <p>The reasonableness of an adjustment will be evaluated against the resource available to our service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.</p>
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<b>2.6</b>	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.		The complaints policy and process is publicised in leaflets annual reports and as part of regular correspondence with residents. A copy is provided when requested.
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	LVRH's stage 1 process investigation letter will provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted the landlord's complaints process.
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	The Housing Ombudsman Service can assist residents throughout the life of a complaint. This affords the resident the opportunity to engage with the Ombudsman's dispute support advisors

### 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	Any complainants via social media will be investigated under this policy. All correspondence will be taken offline, and the tenant will be encouraged to continue their complaint either by email or letter.

### 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	SLH are the managing agent and have the following appointed people to deal with complaints. Customer Insight Partner, alongside Customer First Manager and Director of Customer Experience. LVRHA are made aware of any complaints at regular Board meetings. (Evidence in Board packs)
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Customer Insight Partner will receive training from former Complaints Officer Role, Angela Tunnicliffe



### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	The officer has access to all staff and resources within the organisation and can escalate to the Director of Business Improvement. Both are independent of the service delivery teams.

### Section 4 - Complaint handling principles

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Yes	<p>All complaints are logged within 5 working days and the acknowledgment attachment added to Cx</p> <p>LVRHA's policy has a 2 stage process.            Stage 1 Manager review            Stage 2 Director review</p>

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	Part of revised Complaint's process.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Following recent OD Culture is now embedded.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Some customers don't like emails so letters are sent in the post, some customers are unable to read Arial 11 so larger font letters are sent.
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: <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	Colleagues are interviewed by HR to set out their position firstly 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	<a href="http://www.lunevalleyhousing.co.uk/LVRHA%20Complaints%20Policy%20Nov%202020.pdf">http://www.lunevalleyhousing.co.uk/LVRHA%20Complaints%20Policy%20Nov%202020.pdf</a>
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	Yes	Part of policy' If LVRHA decides not to accept a complaint a detailed explanation should be provided to the resident setting out the reasons why the matter is not suitable for the complaints process. A

	complaints policy and must be the same as the reasons for not accepting a complaint.		resident has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.'
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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 are kept on Cx system, of date complaint received, acknowledged, any information pertaining to the complaint and date of response.
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	In the policy 'Persistent or Unreasonable/Unacceptable Complainants'

### 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	
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	Managers should contact the tenant to discuss the complaint and find out what the required outcome should be.
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 complaints from family members, friends etc on behalf of 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	The Tenancy Agreement lists whose legal obligations are whose.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Particular members of staff or contractors are not referred to in responses but are referred to generically.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaint responses are sent within 10 working days and managers usually contact the customer firstly to establish what exactly is the complaint about.
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	Feedback surveys are sent out once the complaint is closed.
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	Lessons learned are discussed at quarterly customer complaint meetings and the Board are kept informed.
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	Part of the policy 'Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness.'

## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	All complaints must be responded to within 10 working days and the tenant informed if it takes longer.
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	Outstanding actions are mentioned in the tracker.

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	Clear reasons and decisions are given.
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	<p><b>STAGE 1 RESPONSE (MANAGER REVIEW) – target response 10 working days</b></p> <p>Dear XX</p> <p>Thank you for your email/ letter of XYZ regarding XYZ.(It should include a reference to the date of the complaint and how it came in) Then something along the lines of I understand your frustration in this matter (a bit of empathy or similar)".</p> <p><u>Outcome of the Stage 1 Complaint Investigation</u></p> <p><i>To include</i></p> <ul style="list-style-type: none"> <li>• Address all of the complaint points made in the complaint and what your investigation has found – you can list 1, 2, 3 etc</li> <li>• Be clear whether the complaint has been ‘upheld’ (i.e. you agree with their complaint), ‘partially upheld’ (you have agreed to some points but not all) or ‘not upheld’ (that you disagree with their complaint)</li> <li>• Outline the remedies being offered to put things right e.g. apology, proposed actions and timeline, staff training, new process, compensation etc</li> <li>• Outline any wider learning that can</li> </ul>

			<p>be taken as a direct result of their complaint</p> <p><i>At the end</i></p> <p>Thank you for taking the time to complain about XYZ. I hope that you are satisfied with the outcome of my investigation. If not, then you have the right to appeal this decision, and this will be reviewed by a colleague in a senior position at Stage 2 of the Complaints Policy. You have 28 days to appeal this decision and please set out clearly why you do not feel that we have responded satisfactory to your complaint.</p> <p>You have the right to refer your complaint to the Housing Ombudsman Service. Further information is <a href="https://www.housing-ombudsman.org.uk/residents/make-a-complaint/">https://www.housing-ombudsman.org.uk/residents/make-a-complaint/</a>, or call on 0300 111 3000 or write to Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ.</p> <p>You may also receive a message to complete a customer satisfaction survey to help us improve our services and customer experience.</p>
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## 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	Yes	Although we have never declined to escalate a complaint.

	Ombudsman about its decision.		
<b>5.10</b>	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	Usually ask resident what outcome they are seeking.
<b>5.11</b>	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	The resident asks for it to be escalated once a stage is completed.



5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Director review at Stage 2.
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<ul style="list-style-type: none"> <li>This is in the policy - Stage two response – 20 working days from request to escalate – if this is not possible an explanation and a date when the stage two response will be received. This should not exceed a further 10 working days without good reason</li> </ul>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	<p>Stage 2 template</p> <p>Dear XX</p> <p><u>Outcome of the Stage 2 Complaint Investigation</u></p> <p><i>To include</i></p> <ul style="list-style-type: none"> <li>Address all of the complaint points made in the complaint and specifically anything that has been raised by the customer since the Stage 1 investigation response was given. State what your investigation has found – you can list 1, 2, 3 etc</li> <li>Be clear whether the complaint has been ‘upheld’ (i.e. you agree with their complaint), ‘partially upheld’ (you have agreed to some points but not all) or ‘not upheld’ (that you disagree with their complaint)</li> <li>Outline the remedies being offered to put things right e.g. apology, proposed actions and timeline, staff training, new process, compensation etc</li> <li>Outline any wider learning that can</li> </ul>

be taken as a direct result of their complaint

*At the end*

Thank you for taking the time to complain about XYZ. I hope that you are satisfied with the outcome of my investigation. If not, then you have the right to appeal this decision and you can ask that this complaint is investigated by a Tenant Complaint Panel at an optional Stage 3 of the Complaints Policy. This will consist of a group of tenants who have received training but are independent of South Lakes Housing. You have 28 days to appeal this decision and please set out clearly why you do not feel that we have responded satisfactory to your complaint. You also have the right to refer your complaint to the Housing Ombudsman Service. Further information is <https://www.housing-ombudsman.org.uk/residents/make-a-complaint/>, or call on 0300 111 3000 or write to Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ.

You may also receive a message to complete a customer satisfaction survey to help us improve our services and customer experience.

			XXXX
			<p><i>Check list</i></p> <p>Have you spoken to the customer?</p> <p>Have you addressed all of the complaint? points, and the actions you have taken as a result?</p> <p>Do you want to apologise?</p> <p>Can you let the customer know what will change as a result of their complaint?</p> <p>Do you want to consider compensation? or a gesture of goodwill, ie flowers, gift voucher</p> <p>Do we need to involve SLH insurers, i.e. claims for large losses, injuries</p> <p>Can you be sure that things are fixed to stop more complaints coming in</p>

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	No stage 3 complaint with LVRH policy.

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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>		<ul style="list-style-type: none"> <li>• N/A</li> </ul>
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## 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	Will write to customer to explain will be longer than 20 working days
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	This is included on all responses to complaints and included within the policy on LV website.
<b>H</b> 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	Recurring complaints raised with Manager, Customer First Lead and Head of Transformation.
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	Reflected in current practice.

## 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	Will write to customer to explain will be longer than 10 working days
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	This is communicated when a letter of responses is sent in relation to the complaint.

## Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.		N/A
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	All complaints dealt within response times customer are informed that they can 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	Compensation is offered in certain cases and is referred to in the Complaints Policy.
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	Compensation policy in place for consistency
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	Set out in stage response
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 is offered in certain cases and is referred to in the Complaints Policy

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	As part of new process involving customer First Lead and Head of Transformation.
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	Part of policy.

## 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	Part of Annual Tenants Report.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	No	Board received quarterly reports on complaints. Highlight a gap in 22 compliance report to August Board.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	See quarterly complaints reports.

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	As part of new process involving customer First Lead and Head of Transformation. This informs service redesign priorities.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	Customer complaints training is being sort.

## 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	Annual SE completed by complaints team; summary provided to Board as part of August regulatory compliance report completed by governance team.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Part of new OD customer insight lead now complaints Co-ordinator. Move from governance team
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	To put 2022 on website and into the annual report.