# **/Appendix A: Housing Ombudsman Complaints Handling Code**

# **Annual self-assessment of compliance**

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

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 1.2 | A complaint must be defined as:  *‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’* | Yes | Complaints Policy and Procedure. | Section 3.0 a) in the procedure and section 2 in the policy give this definition of a complaint. |
| 1.3 | 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. | Yes | Complaints Policy and Procedure documents. | Section 3.0 d) in the procedure is clear that a resident doesn’t have to use the word complaint for it to be treated as such.  Section 3.0 b) in the procedure states that we will handle complaints from third parties in line with our policy and procedure. |
| 1.4 | 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 complaints, but must be recorded, monitored and reviewed regularly. | Yes | Complaints Policy and Procedure | Section 2 in the policy and section 3.1 a) in the procedure define what a service request is and how to deal with them.  Section 3.1 b) in the procedure states how we record, monitor and review service requests. |

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| 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 | Complaints Policy and Procedure | Section 3.1 b) in the procedure and section 3 in the policy states that a complaint can be made where a service request has not been actioned to the resident’s satisfaction and that we will not stop our efforts to address a service request if a resident complains. |
| 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 | Complaints Procedure | Section 3.1 e) in the procedure states that an expression of dissatisfaction made by a survey or via feedback is not a complaint, but wherever possible, the person completing the survey or sharing the feedback should be made aware of how to make a complaint. Requests for feedback about our services include information about how to make a complaint, e.g., included in TSM survey letters. |

## Section 2: Exclusions

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| 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 | Complaints Procedure | Section 4.0 c) states that we will not take a blanket approach to excluding complaints and will consider the individual circumstances of each complaint. If we decide not to accept a complaint, an explanation will be provided to the complainant setting out the reasons why the matter is not being considered and advise the complainant of their right to take the matter to the Housing Ombudsman. |
| 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:   * 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. | Yes | Complaints Procedure | Section 4.0 a) outlines the reasons for not accepting complaints in line with the Complaint Handling Code. |

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| 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 | Complaints Procedure | Section 4.0 a) states that we will always accept a complaint unless it was over 12 months ago.  Section 4.0 b) states that we can exercise discretion and accept a complaint made outside this time limit where there are good reasons to do so. |
| 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 | Complaints Procedure | Section 4.0 c) states that if we decide not to accept a complaint, an explanation will be provided to the complainant setting out the reasons why the matter is not being considered and advise the complainant of their right to take the matter to the Housing Ombudsman. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Complaints Procedure | Section 4.0 c) states that we will not take a blanket approach to excluding complaints and will consider the individual circumstances of each complaint. |

## Section 3: Accessibility and Awareness

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| 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 | Complaints Policy and Procedure  Website  Leaflets, posters with QR codes in services | Section 5.0 states that we will make it easy for residents to complain by providing information via our website, handbooks, leaflets, posters and letters.  Section 5.0 c) states that we will make appropriate reasonable adjustments for residents under the Equality Act 2010.  Section 7 of our policy explains our approach to assistance and advocacy. |
| 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 | Complaints Procedure | Section 5 a) of the procedure states that residents must be able to raise complaints in any way and with any member of staff. All staff are inducted on the complaints procedure and are able to pass a complaint to the Customer Satisfaction Manager. |
| 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 | Complaints Policy and Procedure | Framework views complaints as an opportunity to improve services. Residents are made aware of how to complain through letters, leaflets, posters, handbooks, our website and staff. Complaints levels are monitored and where there are low levels, this is investigated to ensure better awareness. |
| 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 timescales for responding. The Policy must also be published on the website. | Yes | Complaints Policy and Procedure  Website  Leaflets, handbooks, posters | Section 5 b) of the procedure states that we will make it easy for residents to complain by providing information via our website, handbooks, leaflets, posters and letters. Our information is produced in clear and accessible language. We make appropriate reasonable adjustments to support people to complain. Reviewed literature (leaflets, handbooks, posters) are in place and in line with the Code.  We can provide literature in accessible ways as required.  Our policy is published on the website. |
| 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 | Complaints Procedure | Section 5.0 b) explains how we publicise details of the complaints policy, including information about the Ombudsman and the Code via our website, handbooks, leaflets, posters and letters. |
| 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 | Complaints Procedure | Section 5.0 d) of our procedure states we will give residents the opportunity to have a representative deal with their complaint on their behalf, and, where reasonable, to be represented or accompanied at any meeting about their complaint. |

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| 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 | Complaints Procedure  Website  Leaflets  Letters | Section 5.0e) of our procedure explains that we will provide residents with information on their right to access the Housing Ombudsman service and how they can engage with the Ombudsman about their complaint through our website, handbooks, leaflets, letters etc.  Template response letters that include these details are used.  Section 7 of our policy states that we offer residents the right to take complaints to the Housing Ombudsman under their scheme. |

## Section 4: Complaint Handling Staff

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| 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 | Complaints Procedure | The Customer Satisfaction Manager is responsibility for complaint handling, liaison with the Ombudsman and board reporting. This role is overseen by the Assistant Director – Housing Services.  This is included in section 6.0 a), b) and c) |
| 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 | Complaints Procedure | Section 6.0 b) explains that the Customer Satisfaction Manager will work closely with all colleagues at all levels to ensure a collaborative, comprehensive and joined-up response to all complaints, and that they also have the authority and autonomy to act to resolve disputes promptly and fairly. |
| 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 | Complaints Policy and Procedure | Section 6.0 a) explains that all staff are responsible for the appropriate handling of complaints and complying with the procedure and that training is provided.  An additional post of Customer Satisfaction Officer has been introduced to support the work on complaint handling. |

## Section 5: The Complaint Handling Process

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| 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 | Complaints Policy and Procedure | Section 1 of our policy states that we will adhere to the Complaints Handling Code. Section 7.1 a) explains that residents who make a complaint will not be treated differently. There must be no reprisals or negative consequences for those who raise a complaint. |
| 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 | Complaints Policy and Procedure | We have a 2 stage complaint handling process as per the code. |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process long and delay access to the Ombudsman. | Yes | Complaints Policy and Procedure | We have a 2 stage complaint handling process as per the code. |
| 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 | Complaints Policy and Procedure | Section 6.0 f) of the procedure explains that there may be occasions where a complaint is handled by a third party (e.g. contractor). In such cases we will ensure the complaint forms part of the two stage complaints process set out in the Code as we do not expect residents to go through two complaints processes. |

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| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Complaints Procedure | Section 6.0. g) explains this. |
| 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 | Complaints Procedure | Section 7.2 b) and 7.3 c) of our procedure explains our approach to this. |
| 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 | Complaints Procedure | Section 7.2 b) and 7.3 c) of our procedure explains our approach to this. |
| 5.8 | At each stage of the complaints process, complaint handlers must:   1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. | Yes | Complaints Procedure | Section 7.2 d) includes these requirements. |

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| 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 | Complaints Procedure | Section 7.2 f) explains that any extension will be no more than ten working days unless there is a good reason, which must be explained to the complainant in writing. In section 7.2 d) we state that we will agree the frequency and method of updates with the complainant. |
| 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 | Complaints Procedure | Section 5.0 c) states that we will make appropriate reasonable adjustments for residents under the Equality Act 2010. A record will be kept of any adjustments agreed as well as a record of any vulnerabilities or disabilities that a resident has disclosed. Agreed adjustments will be kept under active review. |
| 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. | Yes | Complaints Procedure | Section 4.0 a) explains when we will refuse to escalate a complaint. |
| 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 | Complaints Procedure | How we record, document and update our complaints on our housing management system is explained in sections 7.1 b) and c) and 7.2 d) of our procedure.  Complaints are now recorded and managed though the complaints module of our Housing Management system. |

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| 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 | Complaints Procedure | Our procedure is clear in section 8.0 a) that in all cases, and at any stage of the complaints process, the priority should be to resolve the complaint as quickly as possible. We will endeavour to resolve complaints and ensure appropriate remedies are provided at any stage of the complaints process without the need for escalation. |
| 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 putting any restrictions in place and must keep restrictions under regular review. | Yes | Complaints Procedure  Managing Unacceptable Behaviour, Violence & Aggression (MUBVA) Policy | Our MUBVA policy is under review to ensure it covers this requirement by still adhering to Framework’s principles of working in a psychological and trauma informed way with excluded and disadvantaged people.  Section 9.0 a) and b) of our complaints procedure refers to when we may act in accordance with the MUBVA Policy.  Section 9.0 c) states that when we will keep records of any restrictions and keep them under regular review. |
| 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 | Managing Unacceptable Behaviour, Violence Aggression (MUBVA) Policy | The MUBVA policy is under review |

## Section 6: Complaints Stages

Stage 1

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| 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 | Complaints Procedure | This is outlined in section 8.0 b) of our procedure. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**. | Yes | Complaints Procedure | This is outlined in section 7.2 b) of our procedure. |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | Yes | Complaints Procedure | This is outlined in section 7.2 f) and g) of our procedure. |
| 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 | Complaints Procedure | This is included in section 7.2 f) of our procedure. |

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| 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 | Complaints Procedure | This is included in section 7.2 f) of the procedure and on relevant correspondence with residents. |
| 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 actioned promptly with appropriate updates provided to the resident. | Yes | Complaints Procedure | This is covered in section 7.2 i) of the procedure. |
| 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 | Complaints Procedure | This is explained in section 7.2 g) of the procedure. |
| 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 | Complaints Procedure | This is included in section 7.2 e) of the procedure. |

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| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint;   the reasons for any decisions made;  the details of any remedy offered to put things right;  details of any outstanding actions; and  details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Complaints Procedure | All of this is included in section 7.2 g) of our procedure. |

Stage 2

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| 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 | Complaints Procedure | Section 7.3 a) states this.  In section 7.3 h) we state that stage 2 is our final response. |
| 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 | Complaints Procedure | This is included in section 7.3 c) of our procedure. |

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| 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 | Complaints Procedure | Our procedures states this in section 7.3 b). |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Complaints Procedure | Section 7.3 c) states that all stage 2 complaints are investigated by an Assistant Director and not the Complaint Satisfaction Manager who dealt with complaint at stage 1. |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | Complaints Procedure | Section 7.3 d) explains that we will issue our final response within 20 working days of the complaint being acknowledged. |
| 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 | Complaints Procedure | This is included in section 7.3 d) of our procedure. |
| 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 | Complaints Procedure | This is outlined in section 7.3 d) of the procedure |
| 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 | Complaints Procedure | This is included in section 7.3 e) of our procedure.  The procedure also states that the Customer Satisfaction Manager will track outstanding actions, providing appropriate updates to the complainant in section 7.3 g) |
| 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 | Complaints Procedure | This is included in section 7.3 f) of the complaints procedure. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and   details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Complaints Procedure | This is included in section 7.3 f) of the complaints procedure. |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | Complaints Procedure | This is stated in section 7.3 h) and c) of the complaints procedure. |

## Section 7: Putting things right

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| 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:   * 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 | Complaints Procedure | This is covered in section 8.0 c) of our procedure |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Complaints Procedure | This is included in section 8.0 d) of our procedure. |
| 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 | Complaints Procedure | This is included in section 8.0 d) of our procedure. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Complaints Procedure | This is included in section 8.0 d) of our procedure. |

## Section 8: Putting things right

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| 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:  the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  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;  any findings of non-compliance with this Code by the Ombudsman;  the service improvements made as a result of the learning from complaints;  any annual report about the landlord’s performance from the Ombudsman; and  any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | Complaints Procedure | This is outlined in section 12.0 a) of our complaints procedure. |

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| 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 | Complaints Procedure | Our annual self-assessment and complaints performance and service improvement report is completed yearly as required and is covered in section 12.0 a) of our procedure. They are also publicised on our website, along with the Board’s response to the report. |
| 8.3 | Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures. | Yes | Complaints Policy | We will do this if required. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Complaints Policy | We would do this if required. |
| 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 | Complaints Policy | We would do this if required. |

## Section 9: Scrutiny & oversight: continuous learning and improvement

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| 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 | Complaints Procedure | Sections 11.0 a) and b) and 12.0 b) explain that we seek feedback on our complaint handling to identify where we need to improve. |
| 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 | Complaints Procedure | We explain how we do this in section 12.0 a) of our complaints procedure. |
| 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 | Complaints Procedure | We explain how we do this in section 12.0 a) of our complaints procedure.  Section 11.0 b) states that we will share our complaints performance with residents as part of an annual resident report, including giving examples of when we have changed our practice, procedures and policies as a result of resident feedback.  Our annual self-assessment and annual complaints performance and service improvement report is also publicised on our website. |
| 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 | Complaints Procedure | The senior lead person is the Assistant Director – Housing Services. This and their responsibilities is explained in section 6.0 d). |
| 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 | Complaints Procedure | The MRC is included in sections 6.0 e) of the complaints procedure. |
| 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 | Complaints Procedure | The MRC’s role and responsibilities are explained in section 6.0 e) and section 12.0 a) of the complaints procedure.  Information and data is provided to the Service Delivery Committee, which is chaired by the MRC, 4 times a year. |

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| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:  regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  regular reviews of issues and trends arising from complaint handling;  regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and  annual complaints performance and service improvement report. | Yes | Complaints Procedure | The MRC’s role is outlined in section 6.0 e) of the complaints procedure. The MRC’s responsibility (and what information the board should receive as a minimum) is explained in section 12.0 a) of our procedure. |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  have a collaborative and co- operative approach towards resolving complaints, working with colleagues across teams and departments;  take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and  act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | Complaints Policy and Procedure | Section 6.0 b) of our procedure explains how we have a collaborative and cooperative approach to complaint handling.  We adhere to relevant professional standards when dealing with complaints and take collective responsibility for any shortfalls.  Relevant staff receive training to ensure they understand and contribute to a positive complaint handling culture.  We are introducing a Customer Insight Group to ensure we collate and evidence learning and changes brought about because of that learning. This will have input from Framework Community to look at how to share learning on a more regular basis, e.g., newsletters, website updates etc. |