# Bromford.

#### ANNUAL SELF ASSESSMENT AGAINST THE COMPLAINT HANDLING CODE - OCTOBER 2023

The Housing Ombudsman Service is set up by law to look at complaints about housing organisations registered with them. It is mandatory for all registered social housing providers, including Bromford, to comply with the Housing Ombudsman Complaint Handling Code 2022.

They resolve disputes around complaints involving the tenants and leaseholders of social landlords (housing associations and local authorities) and our voluntary members.

Their service is free, independent and impartial. Residents and landlords can contact the Ombudsman at any time for support in helping to resolve a dispute. They provide information and guidance to support residents and landlords and they can be contacted via:

HO website, <u>info@housing-ombudsman.org.uk</u> By telephone on 0300 111 3000 or By mail at Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ.

The Housing Ombudsman first published a Complaints Handling Code in July 2020, setting out good practice to help landlords respond to complaints effectively and fairly. This has since been revised and an updated Code was published in March 2022 with a refresh due April 2024.

A key requirement of the code is for landlords to publish an annual self-assessment against the Code's key complaint handling principles.

This is Bromford's third self-assessment. It has been reviewed by an internal customer forum, led by the Chief Officer for Customer Experience. It has been reviewed with Bromford's customer group CCIN (Customer and Community Influence Network) in October 2023 and will be reviewed by Bromford's Board in November 2023. All data refers to 2022/23.

The Ombudsman's revised Complaint Handling Code can be found here. The Code includes mandatory requirements ('musts') and best practice guidance ('should' greyed out) as laid out below.

# Section 1 – Definition of a complaint

| Code     | Code requirement   | Comply:  | Evidence, commentary, and any        |
|----------|--|----------|--------------------------------------|
| section  |  | Yes/No   | explanations                         |
| 1.2      | A complaint must be defined as:                              | Yes      | As set out within our Complaint      |
|          |  |          | policy which is available to         |
|          | 'an expression of dissatisfaction, however made, about       |          | customers on our Bromford website    |
|          | the standard of service, actions or lack of action by the    |          | policy page.                         |
|          | organisation, its own staff, or those acting on its behalf,  |          |                                      |
|          | affecting an individual resident or group of residents'.     |          |                                      |
| 1.3      | The resident does not have to use the word 'complaint'       | Yes      | All expressions of dissatisfaction   |
|          | for it to be treated as such. A complaint that is            |          | with our services in line with the   |
|          | submitted via a third party or representative must still     |          | Code are logged as a complaint,      |
|          | be handled in line with the landlord's complaints policy.    |          | including those who are acting on    |
|          |  |          | our behalf.                          |
| 1.6      | if further enquiries are needed to resolve the matter,       | Yes      | As above at 1.3                      |
|          | or if the resident requests it, the issue must be logged     |          |                                      |
|          | as a complaint.  |          |                                      |
| 1.7      | A landlord must accept a complaint unless there is a         | Yes      | Exclusions to the complaints         |
|          | valid reason not to do so.                                   |          | process are detailed in our          |
|          |  |          | Complaints Policy                    |
| 1.8      | A complaints policy must clearly set out the                 | Yes      | As above at 1.7                      |
|          | circumstances in which a matter will not be considered,      |          |                                      |
|          | and these circumstances should be fair and reasonable        |          |                                      |
|          | to residents.  |          |                                      |
| 1.9      | If a landlord decides not to accept a complaint, a           | Yes      |                                      |
|          | 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.                                   |          |                                      |
| Best pra | ctice 'should' requirements                                  | <b>F</b> |                                      |
| 1.4      | Landlords should recognise the difference between a          |          | Service requests are dealt with in   |
|          | service request, where a resident may be unhappy with        |          | line with process. Training for the  |
|          | a <b>situation</b> that they wish to have rectified, and a   |          | customer service team includes       |
|          | <b>complaint</b> about the <b>service</b> they have/have not |          | recognising the difference between   |
|          | received.  |          | a service request and a complaint.   |
| 1.5      | Survey feedback may not necessarily need to be treated       |          | Where a customer expresses           |
|          | as a complaint, though, where possible, the person           |          | dissatisfaction with a service in a  |
|          | completing the survey should be made aware of how            |          | survey, they are advised of the      |
|          | they can pursue their dissatisfaction as a complaint if      |          | option to pursue as a formal         |
|          | they wish to.  |          | complaint as applicable and the      |
|          |  |          | feedback is also sent to the service |
|          |  |          | manager.                             |

#### Section 2 – Accessibility and awareness

| Code section | Code requirement  | Comply:           | Evidence, commentary, and any   |
|--------------|---|-------------------|---|
|              |   | Yes/No            | explanations  |
| 2.1          | Landlords must make it easy for residents to<br>complain by providing different channels through<br>which residents can make a complaint such as in<br>person, over the telephone, in writing, by email and<br>digitally. While the Ombudsman recognises that it<br>may not be feasible for a landlord to use all the<br>potential channels, there must be more than one<br>route of access into the complaints system.<br>Landlords must make their complaint policy<br>available in a clear and accessible format for all<br>residents. This will detail the number of stages<br>involved, what will happen at each stage and the<br>timeframes for responding. | Yes<br>Yes<br>Yes | explanations<br>Complaints are accepted by all<br>communications methods. There<br>is a leaflet on our website which<br>also explains how to for our<br>customers.<br>Our Complaints Policy and Make a<br>Complaint Leaflet are published<br>on our website. These are also<br>available for our Neighbourhood<br>Coaches to use in hard copy for   |
| 2.4          | Landlord websites, if they exist, must include<br>information on how to raise a complaint. The<br>complaints policy and process must be easy to find  | Yes               | our customers.<br>We have a dedicated Make a<br>Complaint page on our website<br>that includes our policy and how   |
| 2.5          | on the website.<br>Landlords must comply with the Equality Act 2010<br>and may need to adapt normal policies,<br>procedures, or processes to accommodate an<br>individual's needs. Landlords must satisfy<br>themselves that their policy sets out how they will<br>respond to reasonable adjustments requests in line<br>with the Equality Act and that complaints handlers<br>have had appropriate training to deal with such<br>requests.  | Yes               | to raise a complaint<br>The Complaints Policy includes<br>reference to our obligations under<br>the Equality Act 2010.<br>The training package for<br>complaint handlers has been<br>developed to include reference to<br>the necessary skills.<br>The introduction of a quality<br>assurance framework for<br>complaint handlers to utilise also<br>adds to the compliance levels<br>required. |
| 2.6          | Landlords must publicise the complaints policy and<br>process, the Complaint Handling Code and the<br>Housing Ombudsman Scheme in leaflets, posters,<br>newsletters, online and as part of regular<br>correspondence with residents.  | Yes               | Our approach at Bromford is to<br>welcome feedback and the role of<br>the Housing Ombudsman is<br>promoted in our customer<br>communications, our feedback<br>programme, newsletters, annual<br>reviews, annual report and<br>through our Neighbourhood<br>Coaches.   |
| 2.7          | Landlords must provide residents with contact<br>information for the Ombudsman as part of its<br>regular correspondence with residents.   | Yes               | As above (2.6)  |

| 2.8                                 | Landlords must provide early advice to residents<br>regarding their right to access the Housing<br>Ombudsman Service throughout their complaint,<br>not only when the landlord's complaints process is<br>exhausted.   | Yes | We provide this at all stages of<br>the complaints process, not just<br>when the process is exhausted.   |
|-------------------------------------|--|-----|--|
| Best practice 'should' requirements |  |     |  |
| 2.2                                 | Where a landlord has set up channels to<br>communicate with its residents via social media,<br>then it should expect to receive complaints via<br>those channels. Policies should contain details of<br>the steps that will be taken when a complaint is<br>received via social media and how confidentiality<br>and privacy will be maintained. | Yes | Our Complaints Policy and Make a<br>Complaint Leaflet are published<br>on our website. These are also<br>available for our Neighbourhood<br>Coaches to use in hard copy for<br>our customers |

# Section 3 – Complaint handling personnel

| Code section     | Code requirement                                     | Comply: | Evidence, commentary, and any       |
|------------------|--|---------|-------------------------------------|
|                  |  | Yes/No  | explanations                        |
| 3.1              | Landlords must have a person or team assigned to     | Yes     | Our Chief Customer Officer is the   |
|                  | take responsibility for complaint handling to ensure |         | accountable officer with a          |
|                  | complaints receive the necessary attention, and      |         | dedicated team that handle          |
|                  | that these are reported to the governing body. This  |         | formal complaints.                  |
|                  | Code will refer to that person or team as the        |         |                                     |
|                  | "complaints officer".                                |         |                                     |
| 3.2              | the complaint handler appointed must have            | Yes     | The appropriate training is         |
|                  | appropriate complaint handling skills and no         |         | mandatory for all complaint         |
|                  | conflicts of interest.                               |         | handlers. As above (2.5) this is    |
|                  |  |         | being reviewed and will include     |
|                  |  |         | reference to the required skills    |
|                  |  |         | and expectations as laid out in the |
|                  |  |         | revised Code.                       |
| Best practice 's | should' requirements                                 |         |                                     |
| 3.3              | Complaint handlers should:                           | Yes     | This will also be reinforced        |
|                  | • be able to act sensitively and fairly              |         | through our complaint handler       |
|                  | • be trained to handle complaints and deal           |         | training, as referenced above       |
|                  | with distressed and upset residents                  |         | (3.2).                              |
|                  | • 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.                 |         |                                     |

## Section 4 – Complaint handling principles

| Code section | Code requirement   | Comply: | Evidence, commentary, and any   |
|--------------|--|---------|---|
|              |  | Yes/No  | explanations  |
| 4.1          | Any decision to try and resolve a concern must be<br>taken in agreement with the resident and a<br>landlord's audit trail/records should be able to<br>demonstrate this. Landlords must ensure that<br>efforts to resolve a resident's concerns do not<br>obstruct access to the complaints procedure or<br>result in any unreasonable delay. It is not<br>appropriate to have extra named stages (such as<br>'stage 0' or 'pre-complaint stage') as this causes<br>unnecessary confusion for residents. When a<br>complaint is made, it must be acknowledged and<br>logged at stage one of the complaints procedure<br><b>within five days of receipt</b> . | Yes     | Handlers are required to record<br>all interactions with the customer<br>on our system.<br>In line with our Complaints Policy,<br>we have a two-stage process,<br>prior to escalation to the Housing<br>Ombudsman Service.<br>Complaints are acknowledged at<br>the point of receipt. |
| 4.2          | Within the complaint acknowledgement, landlords<br>must set out their understanding of the complaint<br>and the outcomes the resident is seeking. If any<br>aspect of the complaint is unclear, the resident<br>must be asked for clarification and the full<br>definition agreed between both parties.  | Yes     | Handlers are required to contact<br>the customer to understand the<br>complaint and outcomes sought<br>and record this on the system.<br>There is an exemplar resolution<br>letter that requires that this is set<br>out as agreed.   |
| 4.6          | A complaint investigation must be conducted in an impartial manner.  | Yes     | Complaints are investigated by a<br>dedicated team independent of<br>delivery teams and in line with<br>our Complaints Policy.  |
| 4.7          | <ul> <li>The complaint handler must:</li> <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<br/>perceived conflict of interest</li> <li>consider all information and evidence<br/>carefully</li> <li>keep the complaint confidential as far as<br/>possible, with information only disclosed if<br/>necessary to properly investigate the matter.</li> </ul>   | Yes     | Complaints are investigated by a<br>dedicated team independent of<br>delivery teams and in line with<br>our Complaints Policy and as<br>outlined in 2.5 above.  |
| 4.11         | Landlords must adhere to any reasonable<br>arrangements agreed with residents in terms of<br>frequency and method of communication.  | Yes     | As set out in the Complaints<br>Policy.   |
| 4.12         | <ul> <li>The resident, and if applicable, any staff member<br/>who is the subject of the complaint, must also be<br/>given a fair chance to:</li> <li>set out their position</li> <li>comment on any adverse findings before a final<br/>decision is made.</li> </ul>  | Yes     | As above (4.11)   |

| timescales for a resident to request escalation of a<br>complaint.A<br>complaint.4.14A landlord must not unreasonably refuse to<br>escalate a complaint through all stages of the<br>complaints procedure and must have clear and<br>valid reasons for taking that course of action.<br>Reasons for declining to escalate a complaint must<br>be clearly set out in a landlord's complaints policy<br>and must be the same as the reasons for not<br>accepting a complaint.As above (4.11)4.15A full record must be kept of the complaint, any<br>review and the outcomes at each stage. This must<br>include the original complaint and the date<br>received, all correspondence with the resident,<br>correspondence with other parties and any reports<br>or surveys prepared.YesAs above (4.11)4.18Landlords must have policies and procedures in<br>place for managing unacceptable behaviour from<br>residents and/or their representatives when<br>pursuing a complaint.YesAs above (4.11)8.3Landlords should manage residents' expectations<br>from the outset, being clear where a desired<br>outcome is unreasonable or unrealistic.YesThis will also be reinforced<br>through our revised complain<br>handler training, as reference<br>above (3.2).4.4A complaint should be resolved at the earliest<br>evidence is needed to fully consider the issues,<br>what outcome would resolve the matter for the<br>resident and whether there are any urgent actionsYesAs above in 3.2 and 4.11  |   |
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| outcome is unreasonable or unrealistic.handler training, as reference<br>above (3.2).4.4A complaint should be resolved at the earliest<br>possible opportunity, having assessed what<br>evidence is needed to fully consider the issues,<br>what outcome would resolve the matter for theYesAs above in 3.2 and 4.11   |   |
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| <b>4.4</b> A complaint should be resolved at the earliest<br>possible opportunity, having assessed what<br>evidence is needed to fully consider the issues,<br>what outcome would resolve the matter for theYesAs above in 3.2 and 4.11  | ł |
| possible opportunity, having assessed what<br>evidence is needed to fully consider the issues,<br>what outcome would resolve the matter for the  |   |
| evidence is needed to fully consider the issues,<br>what outcome would resolve the matter for the  |   |
| what outcome would resolve the matter for the  |   |
|  |   |
|  |   |
| required.  |   |
| <b>4.5</b> Landlords should give residents the opportunity to Yes As above (4.11)  |   |
| 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.  |   |
| <b>4.8</b> Where a key issue of a complaint relates to theYesAs above in 3.2 and 4.11  |   |
| parties' legal obligations landlords should clearly  |   |
| set out their understanding of the obligations of  |   |
| both parties.  |   |
| <b>4.9</b> Communication with the resident should notYesAs above in 3.2  |   |
| generally identify individual members of staff or  |   |
| contractors.   |   |
| 4.10 Landlords should keep residents regularly updated Yes As above in 3.2   |   |
| about the progress of the investigation.   |   |

| 4.16 | Landlords should seek feedback from residents in<br>relation to the landlord's complaint handling as<br>part of the drive to encourage a positive complaint<br>and learning culture.  | Yes | A complaint handling satisfaction<br>survey is completed following the<br>closure of the complaint. Results<br>are shared with managers, our<br>Executive and Leadership teams<br>CCIN and Board.<br>Our Locality Influence Network<br>and Customer & Communities<br>Influence Network are involved in<br>supporting and shaping our<br>policies. |
|------|---|-----|---|
| 4.17 | Landlords should recognise the impact that being<br>complained about can have on future service<br>delivery. Landlords should ensure that staff are<br>supported and engaged in the complaints process,<br>including the learning that can be gained. | Yes | Feedback from complaints<br>including positive feedback, is<br>shared with handlers and<br>compliments are recorded and<br>shared alongside complaints and<br>feedback.   |
| 4.19 | Any restrictions placed on a resident's contact due<br>to unacceptable behaviour should be appropriate<br>to their needs and should demonstrate regard for<br>the provisions of the Equality Act 2010.  | Yes | The Complaints Policy includes<br>reference to our obligations under<br>the Equality Act 2010, as above<br>(2.5).   |

#### Section 5 – Complaint stages

#### Stage 1

| Code section | Code requirement                                    | Comply: | Evidence, commentary, and any      |
|--------------|---|---------|------------------------------------|
|              |   | Yes/No  | explanations                       |
| 5.1          | Landlords must respond to the complaint within 10   | Yes     | Complaints Policy is in line with  |
|              | working days of the complaint being logged.         |         | Code requirements.                 |
|              | Exceptionally, landlords may provide an             |         | 96.8% of responses provided        |
|              | explanation to the resident containing a clear      |         | within 10 working days between     |
|              | timeframe for when the response will be received.   |         | April to June 2022 new system      |
|              | This should not exceed a further 10 days without    |         | upgrade and reporting was not      |
|              | good reason.  |         | verified                           |
|              |   |         | February 2023 60%                  |
|              |   |         | March 2023 77%                     |
| 5.5          | A complaint response must be sent to the resident   | Yes     | We have a dedicated actions tool   |
|              | when the answer to the complaint is known, not      |         | in our systems to allow actions to |
|              | when the outstanding actions required to address    |         | be set and tracked through to      |
|              | the issue, are completed. Outstanding actions must  |         | completion.                        |
|              | still be tracked and actioned expeditiously with    |         | As above (3.2) and stated in our   |
|              | regular updates provided to the resident.           |         | Complaints Policy.                 |
| 5.6          | Landlords must address all points raised in the     | Yes     | The exemplar letter and quality    |
|              | complaint and provide clear reasons for any         |         | assurance framework requires       |
|              | decisions, referencing the relevant policy, law and |         | that all points listed are         |
|              | good practice where appropriate.                    |         | responded to (2.5).                |

|           |  |          | This will also be reinforced<br>through our revised complaint<br>handler training, as referenced<br>above (3.2).   |
|-----------|--|----------|--|
| 5.8       | <ul> <li>Landlords must confirm the following in writing to<br/>the resident at the completion of stage one in clear,<br/>plain language: <ul> <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<br/>right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to stage<br/>two if the resident is not satisfied with the<br/>answer</li> </ul> </li> </ul> | Yes      | As above (5.6), the quality<br>assurance framework also<br>outlines the process for escalation<br>to stage two.  |
| Best prac | tice 'should' requirements   | <b>I</b> |  |
| 5.2       | If an extension beyond 20 working days is required<br>to enable the landlord to respond to the complaint<br>fully, this should be agreed by both parties.  | Yes      | The Complaint Policy is in line<br>with Code requirements  |
| 5.3       | Where agreement over an extension period cannot<br>be reached, landlords should provide the Housing<br>Ombudsman's contact details so the resident can<br>challenge the landlord's plan for responding and/or<br>the proposed timeliness of a landlord's response.   | Yes      | The Complaint Policy is in line<br>with Code requirements.<br>The HO details are shared at every<br>opportunity with the customer to<br>ensure awareness.<br>Our feedback programme asked<br>the question and since April 2023<br>when first introduced customers<br>have responded positively with a<br>rise from 34.8% to 52.6% and will<br>continue to be a focus |
| 5.4       | Where the problem is a recurring issue, the<br>landlord should consider any older reports as part<br>of the background to the complaint if this will help<br>to resolve the issue for the resident.  | Yes      | This will also be reinforced<br>through our revised complaint<br>handler training, as referenced<br>above (3.2).<br>Especially in relation to how to<br>conduct a good investigation.  |
| 5.7       | Where residents raise additional complaints duringthe investigation, these should be incorporated intothe stage one response if they are relevant, and thestage one response has not been issued. Where thestage one response has been issued, or it wouldunreasonably delay the response, the complaintshould be logged as a new complaint.   | Yes      | This will also be reinforced<br>through our revised complaint<br>handler training, as referenced<br>above (3.2).<br>The Complaint Policy is in line<br>with Code requirements.   |

| Stage 2      |  |                   |  |  |
|--------------|--|-------------------|--|--|
| Code section | Code requirement   | Comply:<br>Yes/No | Evidence, commentary, and any explanations   |  |
| 5.9          | If all or part of the complaint is not resolved to the<br>resident's satisfaction at stage one, it must be<br>progressed to stage two of the landlord's<br>procedure unless an exclusion ground now applies.<br>In instances where a landlord declines to escalate a<br>complaint it must clearly communicate in writing its<br>reasons for not escalating as well as the resident's<br>right to approach the Ombudsman about its<br>decision. | Yes               | The Complaint Policy is in line<br>with Code requirements.   |  |
| 5.10         | On receipt of the escalation request, landlords<br>must set out their understanding of issues<br>outstanding and the outcomes the resident is<br>seeking. If any aspect of the complaint is unclear,<br>the resident must be asked for clarification and the<br>full definition agreed between both parties.   | Yes               | The Complaint Policy is in line<br>with Code requirements.   |  |
| 5.11         | Landlords must only escalate a complaint to stage<br>two once it has completed stage one and at the<br>request of the resident.  | Yes               | The Complaint Policy is in line with Code requirements.  |  |
| 5.12         | The person considering the complaint at stage two,<br>must not be the same person that considered the<br>complaint at stage one.   | Yes               | The Complaint Policy is in line<br>with Code requirements.<br>We have a dedicated adjudicator<br>role which solely reviews the<br>stage 2 complaints with our<br>managers and HoS from the<br>appropriate area of the business<br>to ensure lessons learnt are<br>understood and actioned. |  |
| 5.13         | Landlords must respond to the stage two complaint<br><u>within 20 working days</u> of the complaint being<br>escalated. Exceptionally, landlords may provide an<br>explanation to the resident containing a clear<br>timeframe for when the response will be received.<br>This should not exceed a further 10 days without<br>good reason.   | Yes               | The Complaint Policy is in line with Code requirements.  |  |
| 5.16         | <ul> <li>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</li> <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>                                      | Yes               | The Complaint Policy is in line<br>with Code requirements.<br>83.7% of responses provided<br>within 20 working days between<br>April to June 2022 new system<br>upgrade and reporting was not<br>verified until February 2023  |  |

|                                     | <ul> <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>     |     |  |  |
|-------------------------------------|--|-----|--|--|
| Best practice 'should' requirements |  |     |  |  |
| 5.14                                | If an extension beyond 10 working days is required<br>to enable the landlord to respond to the complaint<br>fully, this should be agreed by both parties.  | Yes | The Complaint Policy is in line with Code requirements.                    |  |
| 5.15                                | Where agreement over an extension period cannot<br>be reached, landlords should provide the Housing<br>Ombudsman's contact details so the resident can<br>challenge the landlord's plan for responding and/or<br>the proposed timeliness of a landlord's response. | Yes | The Complaint Policy is in line<br>with Code requirements as per<br>(5.3). |  |

#### Stage 3

| Code section | Code requirement   | Comply: | Evidence, commentary, and any |
|--------------|--|---------|-------------------------------|
|              |  | Yes/No  | explanations                  |
| 5.17         | Two stage landlord complaint procedures are ideal.<br>This ensures that the complaint process is not<br>unduly long. If landlords strongly believe a third<br>stage is necessary, they must set out their reasons<br>for this as part of their self-assessment. A process<br>with more than three stages is not acceptable<br>under any circumstances.   | N/A     | N/A                           |
| 5.20         | <ul> <li>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</li> <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> | N/A     | N/A                           |
| 5.18         | Complaints should only go to a third stage if the<br>resident has actively requested a third stage review<br>of their complaint. Where a third stage is in place<br>and has been requested, landlords must respond to<br>the stage three complaint <u>within 20 working days</u><br>of the complaint being escalated. Additional time  | N/A     | N/A                           |

|      | will only be justified if related to convening a panel.<br>An explanation and a date for when the stage three<br>response will be received should be provided to the<br>resident.  |     |     |
|------|--|-----|-----|
| 5.19 | Where agreement over an extension period cannot<br>be reached, landlords should provide the Housing<br>Ombudsman's contact details so the resident can<br>challenge the landlord's plan for responding and/or<br>the proposed timeliness of a landlord's response. | N/A | N/A |

#### Section 6 – Putting things right

| Code section     | Code requirement  | Comply: | Evidence, commentary, and any   |
|------------------|---|---------|---|
|                  |   | Yes/No  | explanations  |
| 6.1              | Effective dispute resolution requires a process<br>designed to resolve complaints. Where something<br>has gone wrong a landlord must acknowledge this<br>and set out the actions it has already taken, or<br>intends to take, to put things right.  | Yes     | This will also be reinforced<br>through our complaint handler<br>training, as referenced above<br>(3.2).  |
| 6.2              | Any remedy offered must reflect the extent of any<br>service failures and the level of detriment caused to<br>the resident as a result. A landlord must carefully<br>manage the expectations of residents and not<br>promise anything that cannot be delivered or<br>would cause unfairness to other residents. | Yes     | This will also be reinforced<br>through our revised complaint<br>handler training, as referenced<br>above (3.2) .<br>Compensation Policy reviewed<br>and includes the Remedies<br>Guidance from the Housing<br>Ombudsman. |
| 6.5              | The remedy offer must clearly set out what will<br>happen and by when, in agreement with the<br>resident where appropriate. Any remedy proposed<br>must be followed through to completion.  | Yes     | This will also be reinforced<br>through our complaint handler<br>training, as referenced above (3.2)<br>& referenced in the complaint<br>exemplar letter.   |
| 6.6              | In awarding compensation, a landlord must<br>consider whether any statutory payments are due,<br>if any quantifiable losses have been incurred, the<br>time and trouble a resident has been put to as well<br>as any distress and inconvenience caused.   | Yes     | Our approach to awarding<br>compensation is including in the<br>Complaints Policy.<br>This will also continue to be<br>reinforced through our revised<br>complaint handler training, as<br>referenced above (3.2).        |
| Best practice 's | should' requirements  |         |   |
| 6.3              | Landlords should look beyond the circumstances of<br>the individual complaint and consider whether<br>anything needs to be 'put right' in terms of process<br>or systems to the benefit of all residents.   | Yes     | Monthly reports shared<br>throughout our governance<br>structure include lessons learnt.<br>Our Chief Customer Officer has a<br>continuous improvement plan to<br>ensure progress and traction of<br>areas identified.    |

| 6.7 | In some cases, a resident may have a legal         | Yes | This will also be reinforced         |
|-----|--|-----|--------------------------------------|
|     | entitlement to redress. The landlord should still  |     | through our revised complaint        |
|     | offer a resolution where possible, obtaining legal |     | handler training, as referenced      |
|     | advice as to how any offer of resolution should be |     | above (3.2), and is reflected in our |
|     | worded.  |     | Complaints policy.                   |

# Section 7 – Continuous learning and improvement

| Code section     | Code requirement  | Comply: | Evidence, commentary, and any   |
|------------------|---|---------|---|
|                  |   | Yes/No  | explanations  |
| 7.2              | Accountability and transparency are integral to a<br>positive complaint handling culture. Landlords must<br>report back on wider learning and improvements<br>from complaints in their annual report and more<br>frequently to their residents, staff and scrutiny<br>panels.   | Yes     | Wider learning and improvements<br>are reported back as part of<br>monthly and annual complaints<br>reporting and scrutinised by our<br>Customer and Communities<br>Influence Network.<br>The customer annual report<br>includes a section on complaints<br>performance and learning and is<br>published on our website here. It<br>also includes a link to our latest<br>self-assessment against the code. |
| Best practice 's | should' requirements  |         |   |
| 7.3              | A member of the governing body should be<br>appointed to have lead responsibility for<br>complaints to support a positive complaint<br>handling culture. This role will be responsible for<br>ensuring the governing body receives regular<br>information on complaints that provides insight to<br>the governing body on the landlord's complaint<br>handling performance.   | Yes     | Chief Customer Officer has lead responsibility.   |
| 7.4              | <ul> <li>As a minimum, governing bodies should receive:</li> <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 selfassessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul> | Yes     | In-depth monthly and annual<br>complaints<br>reporting provided to our<br>governing body our CCIN.  |

| 7.5 | Any themes or trends should be assessed by senior     | Yes |  |
|-----|---|-----|--|
|     | 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.                              |     |  |
| 7.6 | Landlords should have a standard objective in         | Yes |  |
|     | relation to complaint handling for all employees      |     |  |
|     | that reflects the need to:                            |     |  |
|     | • have a collaborative and co-operative approach      |     |  |
|     | towards resolving complaints, working with            |     |  |
|     | colleagues across teams and departments               |     |  |
|     | • take collective responsibility for any shortfalls   |     |  |
|     | identified through complaints rather than             |     |  |
|     | blaming others  |     |  |
|     | • act within the Professional Standards for           |     |  |
|     | engaging with complaints as set by the                |     |  |
|     | Chartered Institute of Housing.                       |     |  |

## Section 8 – Self-assessment and compliance

| Code section | Code requirement  | Comply:<br>Yes/No | Evidence, commentary, and any explanations  |
|--------------|---|-------------------|---|
| 8.1          | Landlords must carry out an annual self-assessment<br>against the Code to ensure their complaint handling<br>remains in line with its requirements.   | Yes               | Since the Code was first<br>published, a self-assessment has<br>been completed annually and can<br>be found on our website here.  |
| 8.2          | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.  | Yes               | As the self-assessment has been<br>completed annually any changes<br>have been reflected.<br>Any future significant changes<br>would prompt a review of the<br>self-assessment.                                 |
| 8.3          | <ul> <li>Following each self-assessment, a landlord must:</li> <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> |                   | The self-assessment is shared<br>with the Board as referenced<br>above (7.2 & 7.4), is published on<br>the website as referenced above<br>(8.1) and included in the annual<br>report as referenced above (7.2). |