

Self-Assessment Form – The Housing Ombudsman's Complaint Handling Code (Version March 2022)

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

Key: Policy - refers to Complaints Policy

Code - refers to The Housing Ombudsman's Complaint Handling Code (Version March 2022)

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	Policy updated and fully aligns to definition.
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	Policy is clear that the tenant / customer does not have to use the word 'complaint' for it to be treated as such, and that complaints made by a third party / representative are treated in line for the policy.
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	All Expressions of Dissatisfaction (EOD) are logged as Stage 1 complaints.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Exclusions are included in the Policy: <ul style="list-style-type: none"> • where ForHousing delivers services on behalf of another organisation • where legal action has been taken or is planned

In partnership with

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			<ul style="list-style-type: none"> • issues that would be covered by insurance claims • issues involving a member of staff covered by HR policies
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	The above exclusions are confirmed in the Policy as circumstances in which complaints will not be accepted.
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	All EODs are logged as a complaint. The complaint handler will provide the explanation for the reasons why the complaint has been closed – that is, it is not suitable for the complaints process, as per the exclusions. This ensures monitoring of these instances and is reflected in the case closure code.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Policy updated and fully aligns to definition.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Tenants who report dissatisfaction in complaints are contacted to discuss the issues raised and informed on how to make a complaint if they want – if they agree for their details to be shared with ForHousing by the third party survey company. Feedback information is provided to all managers so they are able to follow up with any individual issues raised.

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	Policy sets out ways to make a complaint - by phone, email, in person through appointments, through my account, an electronic form on our website and on social media. All channels are active and monitored.
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	Policy is publicised on the website. <i>Improvement - Graphical representation to be developed and publicised.</i>
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	This information is available through the contact us and our performance menus on the website.
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	We are compliant with the Equality Act 2010. Staff are also trained in the HEART customer care principles including recognising people as individuals. This is mandatory at induction. The LIVEIT behavioural framework has been developed and supports equity in practice. <i>Improvement – need to agree a process for establishing and carrying out reasonable adjustments to improve the management of complaints</i>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	This is publicised on ForHousing's website and in standard letters within the complaints handling process. Staff handling complaints also include in email signatures. <i>Improvement – Review standard letters to ensure these</i>

			<i>are easy to understand and follow good practice set by the Ombudsman.</i>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This is publicised on ForHousing's website and correspondence within the complaints handling 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	

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	<p>The policy explains about confidentiality as standard and receiving complaints via social media. How these are managed is included in the procedure and a process has been agreed with the marketing team in terms of how these will be responded to.</p> <p><i>Improvement – Statement on the website and within correspondence to be reviewed.</i></p>

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	<p>The organisation have in place a team for oversight of complaints management and also complaints handlers within teams.</p> <p>An appropriate complaints handler is defined in the policy as located in the team responsible for the service, but who has not been involved in the source of the complaint sufficiently to have a conflict of interest. They are trained to handle complaints and are also able to support distressed and upset customers.</p> <p><i>Improvement - Review current training and adopt the Ombudsman online dispute resolution training as part of standard suite of learning and support material for all complaints handlers.</i></p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The complaint handler skills are included in the policy and the necessity to not have a conflict of interest is set as a requirement.

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"> be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>Complaint handling skills have been aligned to the code and this informs training. Our customer care principles which are part of staff induction and are regularly promoted and embedded through our LIVEIT framework.</p> <p>Staff behaviour and competencies are also supported through staff check-in's and annual objective setting</p> 

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 within five days of receipt.</p>	Yes	<p>EOD are logged as a Stage 1 complaint, and with timescales to acknowledge set at 5 working days, in line with the code.</p> <p>We will still aim to resolve service requests 'there and then' or at the latest within a couple of hours. These are logged separately to ensure this feedback is captured for learning. This is in line with the code. If service requests cannot be resolved in this time frame they are logged as EOD Stage 1 for further investigate and resolution.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>The policy has been updated to align to the code. Agreeing the understanding of the complaint is the responsibility of the complaint handler. The complaint and outcome expected is captured in QL as part of the case management.</p> <p>Any clarity on the complaints is established and recorded. This is communicated and affirmed with the tenant/customer</p> <p><i>Improvement - Guidance to be reviewed to include defining complaint and outcome. Spot check of acknowledgement to ensure this is appropriately captured and improvements are made as required.</i></p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Impartiality is a key requirement of the complaint handler's responsibilities. The complaint handler will be chosen by the manager for stage one complaints as someone who is not directly associated with the complaint and has no conflict of interest. Stage 2 will be completed by a member of the HMS senior management team who has not been involved in the complaint, enabling impartiality.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Complaint handling skills have been aligned to the code and this informs training. Our HEART principles promote and LIVEIT behavioural framework reinforces thinking and acting when managing complaints.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Agreeing frequency and method of communication is a key responsibility of the complaint handler as defined in the policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			This information is captured through QL as part of case management. <i>Improvement – Business Support team to carry out regular quality audits to monitor quality and support improvement.</i>
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"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	The policy has been updated to align to the code.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Within 2 months of the Stage 1 being closed, although this is open to discretion on a case by case basis.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	The policy explains this as repeated complaints which appear to have no substance or which have already been through and exhausted our complaints handling. Should such circumstances arise the tenant/customer will receive the reasons in writing.
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	Complaints are recorded in full on QL, contact management system.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	An Unreasonable Behaviour Procedure is in place and the availability of the policy is included in the complaints policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>Managing expectations is a key requirement of the complaint handler's responsibilities. Making clear responsibility of Landlord/tenant, accounting for policy and applying reasonable adjustment as required which is determined according to the individual circumstances. This is captured in QL and confirmed with the tenant/customer through the process.</p> <p><i>Improvement - Spot check and audit to take account of clarity of expectation and outcome.</i></p>
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	<p>Resolving complaints quickly and fairly is a key requirement of the complaint handler's responsibilities. The policy states the importance of reaching a resolution as quickly as possible. The monitoring of timescales to deal with complaints is part of the reporting framework to ensure that this is carried out in a 'reasonable' time frame.</p> <p><i>Improvement - Spot check and audit to take account of time taken.</i></p>
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	<p>A complainant is defined as - any tenant or customer including leaseholders, shared owners or housing waiting list applicants, or any person acting on their behalf, who communicate an expression of dissatisfaction to us.</p> <p>For Housing recognise with the tenant/customers consent a representative, this will be noted within the case record.</p>
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	<p>Setting out legal responsibilities relating to the complaint is a key requirement of the complaint handler's responsibilities. This is captured in QL as part of case management.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Policy updated to align to the code.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	The complaint handler agrees frequency and method of communication with the complainant. This is recorded in QL as part of case management. Time taken is an indicator which is part of the complaints reporting.
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	<p>The policy recognises that adopting the code enables us to resolve complaints quickly and provides data and learning to drive service improvements. The policy commits to analysing complaints to understand where things have gone wrong and to identify what we can do to stop this happening again. We publicise the improvements we have made as a direct result of this feedback, so tenants and customers can see how their feedback has improved standards of service. We also recognise the jurisdiction of The Housing Ombudsman Service and will implement recommendations resulting from their investigations.</p> <p>Tenant satisfaction measures (TP09) include a question on satisfaction on complaints handling, this will be adopted as the standard question set from April 2023 and used for service insight and improvement.</p>
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	<p>Staff are involved in process review and improvement.</p> <p>Increased visibility and self-serve is enabled with tools such as Power BI, supporting easier access to data to aid learning and improvement.</p> <p><i>Improvement - Improvement action plans are to be</i></p>

			<p><i>developed with service areas as part of the stage 2 review and where themes from complaints are identified and as a result of Ombudsman case findings. This is included as part of complaints reporting as part of organisational governance.</i></p> <p><i>Complaints is a standard agenda items on team meetings.</i></p>
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	<p>Tenant and customer vulnerabilities are accounted for in any service adjustment and a culture of person centred practice and decision making is enabled by our strategy framework:</p> <ul style="list-style-type: none"> • Equity, Diversion and Inclusion strategy • Tenant Voice strategy • Wellbeing strategy <p>The HEART principles and LIVEIT behavioural framework support a culture where staff recognise individual needs.</p> <p>Staff receive training/induction on the Equality Act 2010.</p> <p><i>Improvement – Review the Unacceptable Behaviour Policy/ Guidance in line with the Ombudsman's Code and the Inclusive Decision Making Framework.</i></p>

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 within 10 working days 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	EOD are logged as a Stage 1 complaint, and with timescales to respond set at 10 working days, in line with the code.
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	The complaint is closed once a resolution is agreed with the tenant/customer. A written response is sent in line with the code and a schedule of work/actions agreed to be delivered. The case will be left open to monitor delivery of the solution. This is not a stage and will comprise of actions to monitor. There is a requirement to keep the tenant/customer updated within a maximum of 10 working days or by the date the resolution has been agreed to be delivered, such as repair works.

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	The policy has been revised to reflect this requirement. <i>Improvement - Templates and guidance to be reviewed to include reason for decision against each part of complaint including any law, policy and good practice as appropriate.</i>
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	The policy has been revised to reflect this requirement. <i>Improvement - Templates and guidance for stage one to be reviewed to ensure inclusion of:</i> <ul style="list-style-type: none"> <i>the complaint stage</i> <i>the decision on the complaint</i> <i>the reasons for any decisions made</i> <i>the details of any remedy offered to put things right</i> <i>details of any outstanding actions</i> <i>details of how to escalate the matter to stage 2 if the resident is not satisfied with the answer</i>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	These requests will be handled by the Business Support Team overseeing the handling of complaints (the complaint handler). This involves reopening the case and logging the request, recording the reason for refusal. The tenant is notified in line with the code.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition	Yes	The policy has been updated to align to the code. Agreeing the understanding of the complaint is the responsibility of the officer assigned the Stage 2 complaint.

	agreed between both parties.		
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	The policy has been revised to reflect this requirement. Previously staff were encouraged to escalate complaints if they considered issues had not been resolved as they should be. The tenant/customer on completion of stage 1 will be made aware of this option to make the decision directly.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	These requests will be handled by a senior manager with no prior involvement in the complaint.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Stage 2 complaints have a timescale to respond set at 20 working days, in line with the code. The focus is to 'consider' whether the Stage 1 complaint was fully dealt with in line with the policy and therefore the code. This will provide a review of the complaint to inform learning.</p> <p><i>Improvement - Standard template to review the complaint handling at stage 1.</i></p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>The Complaint Handler will provide the written response as outlined in the policy which has been updated to align to the code.</p> <p>There is no Stage 3 as we follow the code guidance that two stages is the ideal.</p> <p><i>Improvement - Review stage 2 guidance and templates to reflect:</i></p> <ul style="list-style-type: none"> <i>the complaint stage</i> <i>the complaint definition</i> <i>the decision on the complaint</i> <i>the reasons for any decisions made</i> <i>the details of any remedy offered to put things right</i> <i>details of any outstanding actions</i>

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.	Not applicable	We have adopted the recommended two stage process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none">• the complaint stage• the complaint definition• the decision on the complaint• the reasons for any decisions made• the details of any remedy offered to put things right• details of any outstanding actions• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	Not applicable	

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	<p>Yes, it is the responsibility of the complaints handler for the Stage 1 complaint to agree extensions with the complainant (only as absolutely necessary or to meet the specific requirements of the tenant/customer needs). Time extensions to be reported in QL as part of the case management.</p> <p><i>Improvement - System change to allow for accurate reporting of timescale so we are able to report where timescale has exceeded but has been consensually agreed and reason captured.</i></p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The complainant is provided with the Housing Ombudsman's contact details.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	It is the Complaint Handler's responsibility to fully investigate the complaint including taking into account previous reports about the same issue.
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	Additional complaints are logged with existing complaints if they are relevant, and as long as it would not unreasonably delay the management of the existing issue. In these circumstances, following discussion with the tenant, a new complaint will be logged.

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	It is the reasonability of the Complaint handler handling the Stage 2 complaint to agree extensions with the complainant (as a last resort).
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	The complainant is provided with the Housing Ombudsman's contact details.

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 <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a	Not applicable	We have adopted the recommended two stage process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	date for when the stage three response will be received should be provided to the resident.		
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.	Not applicable	

Section 6 - Putting things right

Mandatory 'must' requirement

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	The policy gives clear commitments to agreeing a resolution and informing the complainant of what has been agreed, including when this will be completed by.
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	Managing expectations is a key requirement of the Complaint Handler's responsibilities, at Stage 1 and Stage 2.
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	Remedy offers are included in the written response and arrangements are in place to monitor deliver of the remedy on QL, keeping the tenant regularly informed.
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	These areas are taken into account when considering compensation offers. Compensation guidance in place <i>Improvement - Compensation guidance to be reviewed in line with Ombudsman good practice and HO code.</i>

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	<p>"Service requests" as well as complaints will be logged to identify themes and patterns for services improvement. The reasons for complaints and improvements will be regularly reviewed and reported through governance arrangements.</p> <p><i>Improvement - Complaints to be part of standard agenda item within teams to explore themes and areas for improvement. Complaints to be a standard agenda item on Contract Meeting Agendas.</i></p>
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	Such cases will be dealt with together by the complaint handler with the legal team. Complaint handlers on both stages have responsibility to specify legal responsibilities of both parties relating to complaints as set out in 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	<p>Complaints are reported in the annual report and publicised on the website throughout the year, including learning and service standards.</p> <p>Complaints and tenant satisfaction are regularly reported through organisational governance and is part of the ForHousing's performance management framework Satisfaction with complaint handling is also monitored. Complaints handling has been and will continue to be the subject of tenant scrutiny exercises.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	<i>Improvement – The landlord (Cheshire West and Chester Council are developing their governance structure which includes establishing a Tenants Board who will receive regular updates on information and performance on complaints as part of their standard agenda) .</i>
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>The Executive, Board and the new Tenant Board receive reports on complaints.</p> <p>This includes areas such as handling volume, categories, outcomes and performance and a profile of Stage 2 complaints including reason for escalation and redress – including compensation.</p> <p>Ombudsman enquiries are also widely shared, with determination presented to ForHousing Board, along with the management response.</p> <p>Findings by the Ombudsman on other providers are also captured and shared for wider learning.</p> <p>The annual self-assessment against the Complaint Handling Code is completed and shared with the council. It is also published in the ForHousing's website.</p>
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	Senior Management Team deep dives on performance are completed every 6 months or on request in specific service areas. Power BI reporting enables senior managers to access trends in real time to inform service improvements on a strategic and operational level.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>The HEART principle and LIVEIT framework require behaviours supportive of a collaborative and co-operative approach. This is part of staff check-ins and objective setting.</p> <p>The People Strategy sets out key outcomes and the new staff forums provide opportunity to discuss complaints cross team.</p> <p>The senior operation meetings include cross team collaboration bringing together neighbourhoods, community safety, income maximisation and asset management ensuring silo working is broken down and there is collective problem solving which keeps the tenant/customer front and centre in any resolution.</p> <p><i>Improvement – Learning and Development for staff to be aligned to the Chartered Institute of Housing Professional Standards.</i></p>

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Completed.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The policy has been revised to align to the code and the self-assessment reflects these changes.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none">• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents• include the self-assessment in their annual report section on complaints handling performance	Yes	Compliance with the code has been publicised on the website along with the self-assessment. It is also planned to share with the Customer Committee. It will be included in the annual report 22/23 following a further sense check.

Additionally – ForHousing continues to recognise and support the tenant panel, which offers complainants support as a 'designated person' outside of the complaints process. Further information on this role is available on the Housing Ombudsman Service website.

<https://www.housing-ombudsman.org.uk/useful-tools/fact-sheets/3123-2/>