

ForHousing’s self-assessment against The Housing Ombudsman’s Complaint Handling Code (code version April 22)

This review published May 23, found full compliance with the Code. This self-assessment was approved by the Customer Committee on 14th July 2023.

Section 1 - Definition of a complaint

Key: Policy - refers to Complaints Policy, Code - refers to The Housing Ombudsman’s Complaint Handling Code

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	Extract from the policy: A complaint is “an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by ForHousing, including staff and those acting on our behalf, affecting customers or group of customers”.
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, extract from the policy: “The customer does not have to use the word ‘complaint’ for it to be treated as such.”
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	From 1.6.23 the complainant will be informed when they express dissatisfaction that the policy is for a complaint to be logged and they will be

			asked if this is how they would like to proceed. Complaints will be logged if the complainant confirms they want a complaint to be logged.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Exclusions are minimised and set out in the Policy.
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	<p>The exclusions section in the Policy is as follows: “Complaints will not be accepted where the issues have already been handled and considered through the complaints policy.</p> <p>Complaints are encouraged as an opportunity to resolve issues, including where the tenant is taking legal action. Complaints will not be accepted if legal action is completed, and the legal action is aligned to the issues raised in the complaint.</p> <p>Issues covered by HR policies will be handled through these policies and outside of this complaints policy. Staff members or third parties should not, where possible, be named in correspondence. Any staff member who is the subject of the complaint is given a fair chance to set out their position before a final decision is made.”</p>

1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	<p>All Expressions of Dissatisfaction 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.</p> <p>The Policy confirms; “Complainants will be informed of the reasons for the exclusion and informed of their referral rights to the Housing Ombudsman Service.”</p>
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Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a 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	<p>Service Centre staff and Complaint Handlers are regularly reminded not to log service requests as complaints and the website directs customers to the contact us page from the complaints page if they are reporting something for the first time.</p> <p>We are also updating the website to give customers the option to request an update on a service as an alternative to formally raising a complaint.</p>

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	Feedback information is provided to all managers, so they are able to follow up with any individual issues raised, which can result in complaints being raised. The survey company is asked to share with tenants that they can make a complaint if they are dissatisfied.
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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	<p>The Policy sets out ways to make a complaint: "Complaints can be made by phone, email, in person through appointments, through an electronic form on our website and on social media."</p> <p>All channels are active and monitored.</p>
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	<p>The Policy is available on the website. The website advertises information can be accessed in different formats and languages.</p> <p><i>Improvement Graphical representation to be developed and publicised</i></p>

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	The Complaints Policy is available on a dedicated complaints page and documents page 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	<p>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.</p> <p>The LIVEIT behavioural framework has been developed and supports equity in practice. The Policy was updated in May 23 to include more information on reasonable adjustments:</p> <p>"We will agree with the customer any reasonable adjustments required to ensure all customers can complain and receive a fair and equitable complaint handling service. Examples include face to face meetings, including out of office hours, and providing complaint responses in large print and/or translated into preferred languages. Reasonable adjustments will also be considered in the complaint resolution, such as considering health conditions when agreeing repair work or arranging works around carer responsibilities."</p>
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.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Housing Ombudsman Service information is publicised on the ForHousing's website. Complaint responses also provide detail of how to escalate to the Housing Ombudsman Service.
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	The policy explains about confidentiality as standard and receiving complaints via social media. Social media complaints are handled through the service centre in the same way that complaints reported through other channels are dealt with. Our Privacy Policy available on the ForHousing Website.


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	The organisation have in place a team for oversight of complaints management and also complaints handlers within teams. 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.'
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The complaint handler skills are outlined in the policy and the necessity to not have a conflict of interest is set as a requirement. There is an internal online Complaint Handling Network (on Microsoft Teams) where information and training guides are regularly shared and saved for easy reference. This also provides opportunity to ask questions and share developments / changes in complaint handling processes.


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.</p> <p>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	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt .	Yes	Expressions of dissatisfaction are logged as a Stage 1 complaint, if the tenants confirms they want this handled as a complaint, and with timescales to acknowledge set at 5 working days. Where the customer does not want to log a complaint, these are dealt with as service requests.
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	The policy has been updated to align to The Housing Ombudsman's Complaint Handling code, April 22. Agreeing the understanding of the complaint is the responsibility of the complaint handler. The complaint and outcome expected is captured within QL (contact management system) as part of the case management. Any clarity on the complaint is established and recorded. This is communicated and affirmed with complainant. This can be verbally or in writing.
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 1 complaints as someone who is not directly associated with the complaint and has no conflict of interest. Stage 2 will be completed by the Strategy & Performance team, 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	<p>Complaint handling skills have been aligned to the code and this informs training.</p> <p>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> 
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Agreeing frequency and method of communication is a key responsibility of the complaint handler as defined in the policy.</p> <p>This information is captured through QL as part of case management.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>The policy aligns to the code: “Issues covered by HR policies will be handled through these policies and outside of this complaints policy. Staff members or third parties should not, where possible, be named in correspondence. Any staff member who is the subject of the complaint</p>

			is given a fair chance to set out their position before a final decision is made.”
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The Policy states escalations to Stage 2 can be made within 2 months of the Stage 1 being closed.
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 complainant will receive the reasons in writing as per the exclusions section of the Policy.
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, each stage has an individual action code.
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	The Unreasonable Behaviour Procedure is in place and the availability of the procedure is included in the complaints policy: “Where a complainant pursues their complaint in an aggressive, abusive, or threatening manner, or repeatedly pursues complaints which have already been through and exhausted our complaints handling process consideration will be given to applying the Unreasonable Behaviour Procedure.”

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	Complaint handlers are trained to handle complaints with managing expectations is a key requirement as set out in the Policy. "manages expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic".
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	Resolving complaints quickly and fairly is a key requirement of the Policy in line with the code. The monitoring of time scale to deal with complaints is part of the reporting framework.
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	The Policy states the term 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". ForHousing recognise with the complainant's consent a representative, this will be noted within the case record.
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	Setting out legal responsibilities relating to the complaint is a key requirement of the complaint handler's responsibilities in the Policy.

			The Policy clarifies complaint handling if legal action is or has been taken. "Complaints are encouraged as an opportunity to resolve issues, including where the tenant is taking legal action. Complaints will not be accepted if legal action is completed, and the legal action is aligned to the issues raised in the complaint."
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	The Policy confirms that in relation to staff or contractor complaints "Staff members or third parties should not, where possible, be named in correspondence."
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	The complaint handler agrees with the complainant the frequency and method of communication with the complainant. This is recorded in QL as part of case management. Where response times are extended, tenants are informed if this is 10 working days for stage 1 and 2. Extensions beyond 20 working days for Stage 1 and beyond the initial extension for Stage 2 are agreed by both parties. 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	The policy recognises that adopting the code enables us to resolve complaints quickly and provides data and learning to drive service improvements. The policy states: "we analyse complaints to understand where things have gone wrong and to identify what we can do to stop this happening again".

			<p>We publicise the improvements we have made as a direct result of feedback, so tenants and customers can see how their feedback has improved standards of service. This is mainly in the annual report but in 23/24 will be quarterly on the website. We also recognise the jurisdiction of The Housing Ombudsman Service and will implement recommendations resulting from their investigations.</p> <p>Tenant satisfaction measures include a question (TP09) on satisfaction on complaints handling, this was first surveyed in October 2022. We also carry out a monthly transactional survey for complaints and report this to our Customer Committee and on our website.</p>
<p>4.17</p>	<p>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</p>	<p>Yes</p>	<p>Staff are involved in process review and improvement. 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>Improvements are developed with service areas as part of the stage 2 review and Ombudsman case findings. These are reported to the Customer Committee and annual report.</p>

			Staff who are complained about are supported through HR policies and health and wellbeing initiatives.
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>A culture of person centred practice and decision making is enabled by our strategic framework of which Customer focused and equitable services is one of our 3 strategic outcomes.</p> <p>The HEART principles and LIVEIT behavioural framework support a culture where staff recognise individual needs.</p> <p>Tenant and customer vulnerabilities are accounted for in any service adjustment and recorded on our Housing Management system.</p> <p>Staff receive mandatory training and induction on the Equality Act 2010 including an E-Learning recently introduced early 2023.</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 <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Expressions of Dissatisfaction are logged as a Stage 1 complaint, and are acknowledged and logged within 5 working days from the date received and responded to within 10 working days of

			the complaint being logged - after evidence is assessed, in line with the code. Complainants can opt out of logging a complaint if they are dissatisfied, instead having this handled as a service request.
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 complainant. A written response is sent in line with the code and actions agreed to be delivered. The complaint is monitored through QL (our contact management system), with a specific action assigned as 'monitor resolution' to ensure delivery of the solution. There is a requirement to keep the complainant updated within a maximum of 10 working days or by the date the resolution has been agreed to be delivered.
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	Templates and guidance support staff in responding to complaints ensuring an explanation is provided for any decisions made.
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 reflects this requirement. Templates and guidance for Stage 1 complaints have been made available to complaint handlers to ensure inclusion of: <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

			<ul style="list-style-type: none"> • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	These requests are handled by the central team overseeing the handling of complaints (the Stage 2 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 agreed between both parties.	Yes	Agreeing the understanding of the complaint is the responsibility of the central team which handles Stage 2 complaints. Understanding of the escalation reason is confirmed with the tenant ahead of the Stage 2 review.
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 reflects this requirement. On completion of Stage 1 the complainant is made aware of how to escalate.
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 are handled by the central team: "The central Customer Feedback and Improvement function will consider the complaint, as the complaint handler, as they will not have been involved in handling the complaint previously, such as at Stage 1."

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	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 dealt with in line with the policy and therefore the code. This will provide a review of the complaint to inform learning. The Stage 2 complaint is acknowledged within the first 5 working days of this timescale.
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 central team provides the written response within 20 working days of escalation, unless the complaint response time has been extended, in which case it will be within the revised deadline.</p> <p>As ForHousing has a 2 stage process, the complaint handling ends once the Stage 2 response is sent, although there may also be monitoring of any outstanding resolutions to conclusion.</p> <p>The Stage 2 response provides information on how to escalate to the Housing Ombudsman Service.</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	ForHousing have adopted the recommended two stage complaints 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	Not applicable, as ForHousing has adopted the recommended two stage complaints process.

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	it is the responsibility of the complaint handler for the Stage 1 complaint to agree extensions beyond the 20 working days with the complainant (only as absolutely necessary or to meet the specific requirements of the complainant's needs). Time extensions are monitored and reported against, including in the annual report.

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. "If we cannot agree this extension with the complainant we will provide the complainant with The Housing Ombudsman's contact details to raise awareness of the option to challenge our response time."
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 responsibility of the complaint handler to complete a thorough investigation in relation to the issue raised, this includes reviewing historic complaints within the contact management system.
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	The policy has been updated to align to the code: "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 responsibility of the central team handling the Stage 2 complaint to agree extensions with the complainant if this is beyond the further 10 working days. "Response times will not exceed a further 10 working days without good reason,

			shared with the complainant. Any additional extension will be agreed by both parties and applied only where needed to fully respond to the complaint.”
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 if an agreement on the extension period cannot be reached.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Not applicable	Not applicable, as ForHousing has adopted the recommended two stage process.
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	Not applicable, as ForHousing has adopted the recommended two stage process.

Section 6 - Putting things right

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	<p>The policy gives clear commitments to providing:</p> <ul style="list-style-type: none"> • the details of any remedy offered to put things right • details of any outstanding actions
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	<p>Managing expectations is a key requirement of the complaint handler's responsibilities, at Stage 1 and Stage 2.</p> <p>Our Compensation Policy sets out our approach to remedy offered: "ForHousing aims to provide high quality and tenant-focused services and work with tenants to resolve any issues together before the need for compensation arises. We always want to do better so if services fail or fall below our published standards, then we will aim to put them right. There are a number of remedies available to put a situation right and ForHousing will consider offering a financial or non-financial remedy when a tenant has been adversely impacted due to an action or omission on our part, including:</p> <ul style="list-style-type: none"> • inconvenience, distress, or detriment • unnecessary time and trouble • loss of amenities including heating, hot water, mains power for an extended period • loss of use of part of a property

			<ul style="list-style-type: none"> • financial loss” <p>Non-financial remedies include The right remedy depends on what has gone wrong in an individual case and may include one or more of the following:</p> <ul style="list-style-type: none"> • an acknowledgement that things have gone wrong, including an explanation of any shortfalls in service and what we have done or are doing to rectify and learn from this • a sincere apology • a change of decision or policy • repair works to remedy the problem if the issue is repairs related • a goodwill gesture, for example a bunch of flowers, in recognition of the situation <p>Compensation is considered in a number of categories:</p> <ol style="list-style-type: none"> 1. Mandatory payments, where we are required by law to compensate, payments will be made in line with statutory requirements. Payments include: <ul style="list-style-type: none"> a. statutory home loss payment, made to tenants or owner-
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			<p>occupiers required to move home permanently.</p> <ul style="list-style-type: none"> b. disturbance allowance, made to tenants required to move to another property; and c. right to repair scheme, which covers specific repairs that should be completed within a set time limit. <p>2. Discretionary payments, it is important that tenants are compensated fairly where we have failed to deliver our published service standards, e.g.</p> <ul style="list-style-type: none"> • poor complaint handling; • delays in providing a service; • failure to provide a service that has been charged for; • failure to meet target response times; and • failure to follow policy and procedure. <p>Discretionary payments also take into consideration the upset, discomfort, worry, frustration, or uncertainty caused to the tenant. Discretionary payments will be made in line with ForHousing's Compensation Guidance document.</p> <p>3. Quantifiable loss, it is important that customers are compensated fairly where they have experienced an actual financial loss, such as:</p>
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			<ul style="list-style-type: none"> • increased energy bills; • replacing damaged furnishings; or • decoration costs.
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. The Compensation Policy is published on the website.

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	"Service requests" as well as complaints are logged to identify themes and patterns for services improvement. The reasons for complaints and improvements are regularly reviewed and reported through governance arrangements.
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. The

			complaints policy is promoted as an option, instead of or in conjunction with, legal action, and issues can be dealt with as a complaint until the legal outcome is known.
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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 including numbers of complaints, themes, response times and learning. Performance is also publicised on the website throughout the year. Complaints and tenant satisfaction are regularly reported through organisational governance and is part of the ForHousing's performance management framework.</p> <p>Satisfaction with complaint handling is also monitored through third party surveys. Complaint 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
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<p>7.3</p>	<p>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.</p>	<p>Yes</p>	<p>ForHousing Board have an established Customer Committee chaired by a member of the ForHousing Board. In this capacity of Chair of the Customer Committee the Chair takes a lead for complaints to support a positive complaints handling culture together with an appointed member of the Executive leadership team. The Board and the Customer Committee receive performance on complaints as part of their standard agenda.</p>
<p>7.4</p>	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	<p>Yes</p>	<p>The Executive, Board and Customer Committee receive reports on complaints. This includes areas such as handling volume, categories, outcomes and performance and a summary of Stage 2 complaints including reason for escalation and redress – including compensation. This also includes information on Ombudsman determinations.</p> <p>Ombudsman enquiries are also shared, with determinations presented to Customer Committee, 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 Executive and the</p>

			Customer Committee. It is also published on the ForHousing's website.
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	Executive Management Team 'deep dives' on performance are completed upon request. Power BI reporting enables senior leaders to access trends in real time to inform service improvements on a strategic and operational level.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	The 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. The new staff forums provide opportunity to discuss complaints cross team. 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.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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 published in November 22 to align to the code and reviewed and updated in May 23. The self-assessment reflects these changes.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>Compliance with the code has been publicised on the website along with the self-assessment.</p> <p>Involved tenants met (May 23) to review the Self-Assessment for 2023 to ensure all areas are compliant with the code and offer evidence to support each action. It has since been updated in response to feedback from the Housing Ombudsman Service. These changes will be shared with those involved tenants who took part.</p> <p>The result of the revised self-assessment completed May 23 will be shared with the Customer Committee.</p>

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