

Housing Ombudsman Handling Code

Self-Assessment Form

Raven Housing Trust – completed 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

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	Complaint Policy revised 2022 defines a complaint as required in the code: 1.5. Raven defines a complaint as "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."
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	Complaint Policy revised 2022 states the following: 1.6. The word complaint does not need to be used for it to be treated as such. We

			will recognise the difference between a service request (pre-complaint), survey feedback and a formal complaint and take appropriate steps to resolve the issue for customers as early as possible.
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 – action required	We will log a complaint when requested however we also want to do more work with best practice flow charts that the HO has provided to differentiate service requests and where further investigation is required.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We publicise how to make a complaint through a variety of channels demonstrating that we will accept complaints when made however as above this is an area we would like to do more work both with staff and customers.
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	Complaint Policy Revised 2022 – Applicability and Exclusions states: 4.1. We will not normally consider a complaint if the issue giving rise the complaint occurred more than 6 months ago. Where the problem is re-occurring, we will consider older reports if this helps resolve the issue. We will consider this where health and safety or illness has prevented a complaint being raised in the 6 months period 4.2. We do not accept complaints from groups of customers; however, we may accept an individual complaint as a lead

			<p>complaint and any decisions made, may apply to other named individuals in the same circumstances. We would apply the same decisions without the need for multiple investigations.</p> <p>4.3. This policy excludes complaints from contractors and organisations Raven holds a contract or service level agreement with. These will be dealt with through the dispute resolution mechanism in the relevant contract or agreement.</p> <p>4.4. If legal proceedings have started, we will continue our complaints process only where no court proceedings or settlement agreement has been reached.</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	In practice we can demonstrate this happens however in line with the work we want to do on section 1.6/1.7, we will be creating an additional letter template to cover this section.

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.	No	Whilst we do this in practice we want to formalise this (1.6/1.7) and will be using the best practice from HOS to define this.

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	Surveys carried out by Explain have a flag system and any red flags are followed up with the customer where our complaint process will be offered or the issue is logged automatically as a complaint,
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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	Complaint Policy revised 2022 2.1. We will make it easy for residents to complain, by providing different channels through which customers can make a complaint. This can include email, telephone, letter, online or through social media. In practice we accept complaints via phone, email, face to face, letter and facebook
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	Complaint Policy 2022 revised: 2.2. We will make the complaint policy available in a clear and accessible format for customers including publicising the policy on our website and through regular correspondence with customers.

			2.3. We will ensure customers are provided with contact information for the Housing Ombudsman Service and notified that they can refer their complaint to the service at any point in the process.
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	Our new website has a graphical representation of the complaint process as well as links to raising a complaint. Our new MyRaven portal offers the ability to raise and track a complaint online. The website has search field functionality and has been tested by customers to find the complaints section. The website has Reach deck functionality to further assist finding things easily on the website for those customers that need it.
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	Complaint Policy revised 2022 states: 9.1. Raven will comply with the Equality Act 2010 and where deemed necessary will make reasonable adjustments to how we expect or handle a complaint based on individual needs. 9.2. An Equality Assessment has been carried out for this policy and ongoing monitoring of complainant characteristics will continue to identify any future actions required. All staff involved in complaint handling have had equality and diversity training. We do however wish to introduce a complaint checklist as part of further

			improvements to our procedure which will include any equality and diversity checks
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	We publicise the complaint policy, Code and HOS on our website with a dedicated page to the HOS. We also publish the information in Raven Times and as part of the correspondence sent to Customers when they raise a complaint.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We include a standard
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	This is the standard paragraph included in all our complaint letters from GIOT to Appeal stage You can also contact the Housing Ombudsman directly but please note that the Ombudsman will not be able to investigate your complaint until eight weeks from the date of this letter but Residents can contact them at any time while a complaint is going through the complaints process for advice and to help find a resolution. The contact details for the Housing Ombudsman Service are:

			<p>Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/ Phone: 0300 111 3000 Email: info@housing-ombudsman.org.uk Postal address: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ If you have any queries during the complaints process, please contact me as your complaints co-ordinator.</p> <p>Yours sincerely</p>
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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	We have a social media policy and privacy policy and our normal procedure is to take social media complaints off line and contact the resident who posted the comments directly. Any response on a complaint is normally written by our media agency. No personal details are shared or asked for online.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	Raven Housing Trust has a dedicated complaint handler in post. In addition Head of Customer Experience oversees the complaint process and provides regular performance reports.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.		Complaint handler has attended various HOS course to ensure they have appropriate skills and has no conflicts of interests (confirmed by Declaration of Interest form)

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <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	Complaint handler has attended various HOS run course and has authority and autonomy to investigate and resolve complaints. They have access to the information required to do this.

Section 4 - Complaint handling principles

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	<p>1. GET ON TRACK - In order to try and resolve complaints as quickly as possible we may initially deal with the problem or service failure under our 'get on track' process.</p> <ul style="list-style-type: none"> • We aim to resolve the failure in service and get it back on track within five working days. A get on track complaint is dealt with much quicker than a formal complaint as we will not normally carry out an investigation or send formal letters. • The complainant will receive an agreed plan of actions and timescales to deal with their complaint. • Get on track can be by-passed if a customer wishes to raise a formal complaint immediately. However, we will expect residents to explain why if they do not wish to use the get on track option first. • Get on track complaints can be raised and dealt with by all front-line staff. As part of this process front line staff are empowered to offer financial redress.
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	This is set out in both the GIOT and formal acknowledgement letter.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We ensure that the investigation officer as not been involved or named in the

			complaint. Responses are reviewed by a further independent manager.
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>Complaints handlers and other members of staff have attended HOS training course to ensure that investigations are carried out in a professional manner.</p> <p>We plan to do review of investigations and the information available now that complaints are on a new housing management.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We can demonstrate that we are flexible in terms of frequency and communication and where more time is required, or where a face to face meeting has been requested we have complied with this request.
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>Where a staff member is named in a complaint they will be interviewed by a manager to hear their comments.</p> <p>Where applicable we will discuss findings with a customer or staff member before a final decision is made.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	All complaint responses state the period in which escalation should be requested.
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	Yes	<p>Complaint Policy revised 2022 states</p> <p>The grounds on which an appeal will be considered are:</p>

	<p>landlord's complaints policy and must be the same as the reasons for not accepting a complaint.</p>	<ul style="list-style-type: none">a) There was a material administrative error in the information received and considered; orb) There is evidence to suggest that a policy or procedure is incorrect in terms of government legislation, orc) There is evidence key information presented as part of the original complaint has not been considered, ord) That the complaint has not been conducted in accordance with Ravens complaint policy, ore) The complainant had been prevented from attending or submitting evidence by illness or other compelling cause that related to personal circumstances, orf) The complainant feels they have been treated unfairly or disadvantaged accessing the complaint process because of a protected characteristic identified in the Equality Act, org) The value of financial compensation is incorrect. This will only be considered where Raven has not followed the Housing Ombudsman remedy guidance or has not taken directly relevant evidence of monetary loss into account in making an award. Evidence of monetary loss must have been submitted as part of the original complaint. We may offer to review the offer of compensation outside a formal appeal to support a swift resolution where this is the only issue.
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4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	We log and track complaints on IPC housing management system. This logs all dates and correspondence relating to a complaint.
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	Complaint Policy revised 2022 states: 4.5. In circumstances where complainants are thought to be unreasonable, unreasonably persistent, or even vexatious, and this behaviour is having a significant or detrimental impact on staff this may affect the way a complaint is dealt with. In these cases, we will decide on the most appropriate way to manage and conclude the complaint. Full details of our response to unreasonable behaviour can be found in Challenging 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	Where a policy or procedure is relevant to a complaint we will manage expectations with this information however we also manage expectations of compensation payments by attaching the HOS remedy guidance to all complaint acknowledgements.

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	Our GIOT stage offers a quicker resolution without the need for a formal response. When logging any complaint on our system we capture the desired outcome. Where an urgent issue requires immediate action this will be captured through the proposed complaint checklist we plan to implement.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	We allow for a representative to act on resident behalf if we have had authority to speak given to us by the resident.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	As part of any response that refers to legal obligations evidence such as tenancy agreement is included in the response.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Only where appropriate do we name individuals
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	The complaint handler's role is to update residents on an agreed basis. MyRaven provides a Track It option for those complaints raised on online
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	We send out an emailed survey after a complaint is closed. We achieved 82% satisfaction in 2021/2022
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	We plan to deliver a suite of training on complaints to teams which will include online learning, presentations and as part of induction. We plan to use the Customer First Group to help identify learnings from complaints so these are widely understood and implemented across the business

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	We invoke the Challenging Behaviour policy we note any consideration to needs, This will also be noted at the start of complaint process using the check list.
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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	Complaint Policy revised 2021/22 states 2. FORMAL COMPLAINT - If a customer is unhappy with a service we have provided or we have been unable to resolve an issue to their satisfaction under our get on track process they can raise a formal complaint. • A manager will investigate the complaint and offer a face-to-face meeting with the complainant to discuss the complaint. If a face-to-face meeting is not required or not possible, the complainant will receive a phone call from the investigating manager. • The manager will provide a written response within 10 working days of receiving the complaint and will keep the complainant informed of the progress until resolution.
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.	Yes	Complaint Policy Revised 2022 states: The formal response will include: the complaint stage, the outcome of the

	Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.		complaint, the reasons for any decisions made, details of any remedy offered to put things right and any outstanding actions. <ul style="list-style-type: none"> • We aim to fully resolve the complaint and carry out agreed actions within 30 calendar days where it is the responsibility of Raven or one of our contractors. If longer is required, we will contact the complainant to agree a new timescale. • We will send a closure letter if we have not heard from
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	We have adopted the HOS template for responses and further training is planned for complaint handler and other managers.
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	Complaint Policy revised 2022 states: The formal response will include: the complaint stage, the outcome of the complaint, the reasons for any decisions made, details of any remedy offered to put things right and any outstanding actions. All of these points are in the HOS template that we now use.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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<p>5.9</p>	<p>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.</p>	<p>Yes</p>	<p>Complaints Policy revised 2022 states:</p> <p>The grounds on which an appeal will be considered are:</p> <ul style="list-style-type: none"> a) There was a material administrative error in the information received and considered; or b) There is evidence to suggest that a policy or procedure is incorrect in terms of government legislation, or c) There is evidence key information presented as part of the original complaint has not been considered, or d) That the complaint has not been conducted in accordance with Ravens complaint policy, or e) The complainant had been prevented from attending or submitting evidence by illness or other compelling cause that related to personal circumstances, or f) The complainant feels they have been treated unfairly or disadvantaged accessing the complaint process because of a protected characteristic identified in the Equality Act, or g) The value of financial compensation is incorrect. This will only be considered where Raven has not followed the Housing Ombudsman remedy guidance or has not taken directly relevant evidence of monetary loss into account in making an award. Evidence of monetary loss must have been submitted as part of the original complaint. We may offer to review the offer of compensation outside
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			a formal appeal to support a swift resolution where this is the only issue.
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	We can evidence that where an escalation is received we will contact the resident to understand what has not been addressed to their satisfaction.
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	
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Where an appeal is accepted, it will be heard by a panel which will normally include a Board Member (chair), a Raven resident (usually a member of Customer Voice Panel), and a Raven Director who has not been significantly involved in the complaint. The Raven manager who investigated the complaint and the customer will also attend.
5.13	Landlords must respond to the stage two complaint within 20 working days 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	Complaint Policy revised 2022 states: We will write to the complainant within 20 working days from the date of request for escalation setting out whether the appeal has been accepted or declined and the reasons for this decision.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:	Yes	The HOS template is used and will cover these parts.

	<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. 		
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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.	Yes	We have a formal 2 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 	NA	

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	We have evidence of writing to residents extending agreed timescales
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	Complaint policy revised 2022 2.3. We will ensure customers are provided with contact information for the Housing Ombudsman Service and notified that they can refer their complaint to the service at any point in the process.
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	Complaint policy revised 2022 4.1. We will not normally consider a complaint if the issue giving rise the complaint occurred more than 6 months ago. Where the problem is re-occurring, we will consider older reports if this helps resolve the issue. We will consider this where health and safety or illness has prevented a complaint being raised in the 6 months period
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	Our policy includes a phone call to the complainant to ensure we capture all details.

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	We have evidence of writing to residents extending agreed timescales
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	Complaint policy revised 2022 2.3. We will ensure customers are provided with contact information for the Housing Ombudsman Service and notified that they can refer their complaint to the service at any point in the process

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.	NA	Not applicable
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.	NA	Not applicable

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	YES	<p>Complaints Policy revised</p> <p>3.1. Or approach when considering remedies to a complaint follows the Housing Ombudsman Service remedy guidance and includes:</p> <p>Be Fair – we will seek fair outcomes ensuring we treat each case individually and taking into account the behaviour of complainant as well as our actions</p> <p>Put Things Right – we will consider a range of measures to put things right for a complainant including financial compensation where appropriate.</p> <p>Learn from Outcomes – We will ensure that changes are made to policies, procedures, systems, staff training or all of these to reduce future complaints.</p> <p>3.2. Where a complaint is upheld, we will consider a variety of remedies, which could include:</p> <ul style="list-style-type: none"> • An apology – acknowledging an error and taking responsibility • Specific action – such as completing repairs or changing a decision • Amending policies or procedures • Financial compensation - for quantifiable financial loss or other financial redress

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	We use the HOS remedy guidance to determine any offer of remedy along with other considerations such as repair standard.
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	This is included in the HOS response template that we have adopted. We use IPC to track a complaint to completion.
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	As in 6.1

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	We currently identify lessons learnt and where appropriate change a process or system. Examples of these are on our website
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	We work closely with solicitor to offer the right level of redress especially with cases of disrepair

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	Yes	We report learning from complaints in the Annual report, Raven Times and on our website. We intend to use the Customer

	report and more frequently to their residents, staff and scrutiny panels.		First Group as a complaint scrutiny group focusing on learnings.
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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	Amy Cheswick – Director of Customer and Partners
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	The Board and Leadership Team receive quarterly operations reports including a section on complaint performance. They also receive information on HOS findings and where applicable individual cases. They also receive a regular report on performance against the action plan following the launch of the Complaint Code.
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	The Business Management team receive monthly complaint reports and any trends requiring process or culture change are addressed by this group

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	Our culture statements support these standards however further work on professional standards and training is planned.
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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	We carried out a self-assessment in 2020 with an action plan implemented in 2021. We are carrying out the self-assessment following the launch of the revised Code and our revised Complaints Policy. The self-assessment will be publicised on the website,
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We are carried out the self-assessment following the revised Complaint Policy 2022.
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	The last assessment went to the Board in December 2020 and both audit committee and Leadership received quarterly updates on the action plan. The assessment was published on the website and is included in the Board Report Annual Complaints Review