

Independent Housing Ombudsman Complaint Handling Code Self-Assessment: Midland Heart; October 2023

Section 1 - Definition of a complaint Mandatory 'must' requirements				
Code section	Code requirement	Comply: Yes/No	Change from 2022	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	No new evidence as policy and standard are both unchanged	We have adopted this definition of a complaint in our complaints policy which is displayed on our website Evidence: <ul style="list-style-type: none"> 1.2.1 Complaints Policy – Page 5, section 4.3.1
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	No changes to standard Recommendation from last year has been implemented (amend policy wording). Evidence: <ul style="list-style-type: none"> 1.3.1a Complaints Policy Page 8 section 4.7.2,4.7.3 updated We have also undertaken additional training with front line teams to ensure they are clear on when a complaint can be received Additional Evidence: <ul style="list-style-type: none"> 1.3.1 b NEW Complex Team Training slides 	We can evidence through audit of complaints received that complaints are accepted where the word complaint is not used. We process complaints received by third parties and this is clearly outlined in our complaints policy, page 8, 4.7.2
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	No new evidence as policy and standard are both unchanged	We have an early resolution process for where an immediate solution can be agreed, for example when a customer is chasing an existing service request. Our complaints process clearly states that a formal complaint will be logged if early resolution fails to resolve the matter. Evidence: <ul style="list-style-type: none"> 1.6.1 Complaints Policy Pages 6-7 section 4.6.3 1.6.2 Complaints Policy Pages 8, section 4.7
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	No new evidence as policy and standard are both unchanged	We outline the circumstances for which a complaint would not be considered in our complaint will not be accepted.

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				Evidence: <ul style="list-style-type: none"> 1.7.1 Complaints Policy – Page 6, section 4.3.3
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	No new evidence as policy and standard are both unchanged	<p>We outline the circumstances for which a complaint would not be considered in our complaint will not be accepted.</p> Evidence: <ul style="list-style-type: none"> 1.8.1 Complaints Policy – Page 6, section 4.3.3
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>No changes to standard, evidence is up to date</p> Evidence: 1.9.1 Exclusion Letter(updated)	We provide detailed explanations when a complaint is not accepted and offer the right to escalate to the Ombudsman
Section 1 - Definition of a complaint Best Practice 'Should' Requirements				
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>No changes to standard</p> <p>We have undertaken additional training with front line teams to ensure they are clear on the difference between a service request and complaint</p> Additional Evidence: <ul style="list-style-type: none"> 1.3.1 b NEW Complex Team Training slides 	<p>Our complaints policy clearly outlines those complaints do not cover where a customer requests a service to resolve a situation that has occurred for the first time.</p> <p>Our customers have fed back that the use of the term 'new service' could be misleading. We can confirm that the use of this term complies with the IHO code. More detailed examples of what is meant by the term 'service request' can be found on pages 15-17 of the IHO code</p> Evidence: <ul style="list-style-type: none"> 1.4.1 Complaints Policy page 6, section 4.3.3
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	<p>No changes to standard</p> Evidence: 1.5.1 Customer satisfaction (updated)	<p>We do automatically send emails to relevant service areas where customers express dissatisfaction in our telephone survey.</p> <p>Where customers express dissatisfaction will include a statement that advises customers of their right to make a complaint.</p>
Section 2 - Accessibility and awareness Mandatory 'must' requirements				
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	No new evidence as guide and standard are both unchanged	<p>There are multiple routes for a customer to make a complaint</p> Evidence: 2.1.1 Complaints Guide Page 4
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	No changes to standard, evidence is up to date	<p>We provide our complaints policy on our website alongside a dedicated complaints page.</p> <p>We also provide an easy read version of our complaints policy and have an</p>

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				<p>accessibility tab on our webpages to enable customers to amend the format of our complaints information should they need (eg larger print, background colour, translate)</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.3.1 Complaints Guide • 2.3.2 Complaints - Midland Heart website • 2.3.3 Accessibility page online
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	No changes to standard, evidence is up to date	<p>Our complaints process and timescales are clearly outlined on our website Complaints - Midland Heart</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.4.1 Complaints search term • 2.4.2 Complaints Policy Link
2.5	<p>Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.</p> <p>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.</p>	Yes	No changes to standard, evidence is up to date	<p>We have included Equality and Diversity and Reasonable adjustments into our complaints process</p> <p>All of our Customer Experience Team are required to complete mandatory E-learning and classroom learning on Equality and Diversity alongside reading our Reasonable adjustments policy.</p> <p>Recent examples of reasonable adjustments given to customers are available on request.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.5.1 Complaints Policy page 9, section 5.1 • 2.5.2 Complaints Policy page 9, 6.1.1-4
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	<p>No changes to standard</p> <p>We have completed all actions in the existing plan, and have developed a new plan for 2023 to ensure information remains up to date</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.6.2 Communications action plan Updated 	<p>We publish all this information online and have a detailed communication action plan that outlines the additional ways we promote this service.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.6.1 IHO Complaints Code online • 2.6.2 Communications action plan
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>No changes to standard</p> <p>Last year we outlined plans to include the IHO contact details in a variety of ways (see 2.6.2) which have now been completed</p> <p>Additional Evidence:</p> <p>2.7.2 IHO Complaints Code online</p>	<p>Our communication action plan outlines how we promote the Ombudsman service to customers.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • 2.7.1 IHO Complaints plans

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			2.7.3 Complaints Leaflet	
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	No changes to standard Recommendation from last year to explore whether acknowledgement can be sent in a format other than letter. Additional Evidence <ul style="list-style-type: none"> 2.8.1b Complaint acknowledgement email 	We have introduced a new standardised acknowledgement letter that includes the details of the IHO Evidence: <ul style="list-style-type: none"> 2.8.1a Complaint Acknowledgement Letter
Section 2 - Accessibility and awareness Best practice 'should' requirements				
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	No changes to standard Recommendation from last year has been implemented (amend policy wording). Evidence: 2.2.1 Complaints Policy page 6, section 4.3.4 (updated)	We have proposed a new element to our complaints policy to make it clear how confidentiality and privacy will be maintained for complaints received via social media.
Section 3 - Complaint handling personnel Mandatory 'must' requirements				
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	No changes to standard As a result of the increased volume in complaints and to ensure we can respond to complaints in line with the IHO code we have increased the size of the team from 4 to 6 officers. Evidence: 3.1.1 Organisation Chart Showing Customer Experience Team (updated)	We have a dedicated Customer Experience Team (4 Officers) who take responsibility for complaint handling. Complaints are regulatory reported to our governing body (Board and Operations Committee) in line with the requirements of section 7 of the code.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	No changes to standard, evidence is up to date	Our role profile includes the key complaints handling skills required for the role and are required to do declaration of interest forms where relevant. Evidence: <ul style="list-style-type: none"> 3.2.1 Internal Declaration of Interest Form 3.2.2 Customer Experience Officer role profile

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Section 3 - Complaint handling personnel Best practice 'should' requirements				
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	No changes to standard Evidence: <ul style="list-style-type: none"> • 3.3.1 Internal Complaints Dashboard (updated) 	CET have access to all senior stakeholders as well as frontline staff to resolve complaints to ensure they can resolve complaints quickly All CET undertake Inclusion learning (in person and online) and are expected to demonstrate how they have provided an inclusive service. As part of training plan, an overview of the IHO is given and constant coaching on this and letter writing is given to CET. Evidence: <ul style="list-style-type: none"> • 3.3.2 Outline of Inclusion & Diversity training • 3.3.3 Customer Experience Officer Role Description <p>Q&A session with Customer Experience Officers. Yes, we are empowered to challenge our colleagues professionally and have an independent stance to give us better advocacy for our customers. Some barriers we face are that this is not always consistent across all areas of the business. This may be due to new ways of working, and staff learning to adapt to these changes. We have knowledge of escalation processes if we do not get engagement from our colleagues in their departments to ensure that our role and our customers are not impacted. Which we find works well and we constantly seek to work well with these colleagues to ensure smoother working. For instance, joint working workshops are arranged between ourselves and departments we work closely with to consistently improve this.</p>
Section 4 - Complaint handling principles Mandatory 'must' requirements				
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	No changes to standard Recommendation from last year has been implemented (amend policy wording). Evidence: <ul style="list-style-type: none"> • 4.1.3 Complaints Policy page 7 4.6.3 (updated) 	We agree all resolutions with the customer and record details of conversations with customers through Our audit trails which include: Northgate, 360, DRS, Total, recorded calls, emails. Evidence: <ul style="list-style-type: none"> • 4.1.1 Formal response example Our complaints policy is clear that all complaints that cannot be resolved 'there and then' are dealt as a stage one complaint. Evidence: <ul style="list-style-type: none"> • 4.1.2 Complaints Policy page 8 • 4.1.3 Complaints Policy page 7 4.6.3 • 4.1.3 Complaint acknowledgement and contact

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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	No change to standard, evidence is up to date	We have created a standard template for all complaint acknowledgement Evidence: <ul style="list-style-type: none"> 4.2.1 Complaint Acknowledgement Letter
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	No changes to standard, evidence is up to date	As per 3.2 – conflicts of interest are avoided. All Stage one complaints are dealt with by the CET who do not work for any other service areas and our complaints policy outlines our impartial and objective approach. Evidence: <ul style="list-style-type: none"> 4.6.1 Internal Declaration of Interest Form 4.6.2 Complaints Policy page 5 section 4.2.2
4.7	The complaint handler must: <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	No changes to standard, evidence is up to date	our complaints policy outlines our impartial and objective approach. Evidence: <ul style="list-style-type: none"> 4.7.1 Internal Declaration of Interest Form 4.7.2 Complaints Policy page 5 section 4.2.2
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	No changes to standard, evidence is up to date	We can evidence how we have adapted our approach to customers' requests for communication Evidence: 4.11.1 Accessibility Letter
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	No changes to standard, evidence is up to date	We can evidence how we have spoken to staff and residents to understand their viewpoint prior to issuing a complaint response. Evidence: <ul style="list-style-type: none"> 4.12.1 Statement from staff member
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	No changes to standard, evidence is up to date	Our complaints policy provides clear timescales for customers to escalate their complaint. Evidence: <ul style="list-style-type: none"> 4.13.1 Complaints Policy page 8, section 4.7.5
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	No changes to standard Recommendation from last year has been implemented (amend policy wording). Evidence: <ul style="list-style-type: none"> 4.14.1 Complaints Policy 4.7.6 Page 8 (updated) 	We have proposed an addition to our Complaints Policy to make the circumstances in which we would refuse to escalate a complaint clear Evidence: <ul style="list-style-type: none"> 4.14.1 Complaints Policy 4.7.6 Page 8

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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	No changes to standard, evidence is up to date	Each case has a dedicated folder for all case notes and correspondence. Evidence: <ul style="list-style-type: none"> 4.15.1 Complaint Case Notes
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	No changes to standard, evidence is up to date	We have an approach and guidance for unreasonable and persistent complainants. Evidence: <ul style="list-style-type: none"> 4.18.1 unreasonable and persistent complainants' guidance.
Section 4 - Complaint handling principles Best practice 'should' requirements				
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	No changes to standard, evidence is up to date	We will manage our customers expectations where they have requested for an outcome that is not realistic. Evidence: <ul style="list-style-type: none"> 4.3.1 Compensation breakdown expectations
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	No changes to standard, evidence is up to date Evidence: 4.4.1 Internal Dashboard timescales (updated)	We provide a response to all complaints within 10 working days.
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	No changes to standard, evidence is up to date	This is currently in our process Evidence: <ul style="list-style-type: none"> 4.5.1 Correspondence with customer's support worker 4.5.2 Complaints policy page 8 section 4.7.2
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	No changes to standard, evidence is up to date	We clearly outline our legal responsibilities to customers in our complaint responses Evidence; <ul style="list-style-type: none"> 4.8.1 - Formal Outcome - Legal obligations
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	No changes to standard, evidence is up to date	Generally we do not use individual names of members of staff, however where a customer has referenced this or specifically complains about the conduct of a named member of staff we will reference this in our response. Evidence; <ul style="list-style-type: none"> 4.9.1 – Formal Outcome Names
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	No changes to standard, evidence is up to date	We regularly update customers and log this to ensure there is an audit trail. Evidence; <ul style="list-style-type: none"> 4.10.1 - Progress of Investigation
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	No changes to standard, evidence is up to date Evidence; <ul style="list-style-type: none"> 4.16.1 Complaints Customer Satisfaction 	We conduct customer satisfaction surveys of closed complaints each month through an external company.

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			(Updated)	
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	No changes to standard Evidence 4.17.3 Assets Service Improvement Clinic (Updated) 4.17.4 Complaint E- learning (Updated)	Evidenced through Service Improvement Clinics and Core Briefs Evidence: <ul style="list-style-type: none"> 4.17.1 – Fairness and Complaints Presentation to Housing 4.17.2 – IHMT Service Improvement Clinic agenda
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	No changes to standard, evidence is up to date	We have an unreasonable and persistent complainant policy which outlines how and when we will restrict resident contact. Evidence: <ul style="list-style-type: none"> 4.19.1 Unreasonable Persistent Complainant Policy
Section 5 - Complaint stages Mandatory 'must' requirements Stage 1				
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	No changes to standard, evidence is up to date	We have a complaints activity report that outlines the timescales for which all complaints are responded to in our SLA is 10 working days. Where extensions have been required we have agreement from tenants. Evidence: <ul style="list-style-type: none"> 5.1.1 Internal Dashboard response times (updated)
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	No changes to standard, evidence is up to date	We respond to all complaints when the answer is known and in line with our SLAs. Where further actions are identified to address the issue, we will inform the customer. We provide customers with an update. Evidence: <ul style="list-style-type: none"> 5.5.1 Progress of investigation
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	No changes to standard, evidence is up to date	We provide detailed responses to complaints, referencing all law and policy. Evidence: <ul style="list-style-type: none"> 5.6.1 Complaint Reference Law
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"> 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	No changes to standard, evidence is up to date	We have provided a sample letter that evidences that our complaint letters adhere to this guidance. Evidence: <ul style="list-style-type: none"> 5.8.1: Completion of Stage 1
Section 5 Complaint stages Mandatory 'must' requirements Stage 2				

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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	No changes to standard Since the code was published we have only refused 1 Review as It was deemed a legal issue. In this case we offered the right to go to the Ombudsman. Additional Evidence: 5.9.1 Review Refusal Letter	Same exclusions apply to escalations as those that apply for accepting complaints. We do not as a standard practice decline customers' requests to escalate to stage 2 outside of these reasons.
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	No changes to standard, evidence is up to date	We confirm all requests for escalations with the customer which identifies the request to escalate and the customers desired outcome. Evidence: 5.10.1 – Acknowledgement of Escalation
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	No changes to standard, evidence is up to date	We can evidence this through review spreadsheet and samples of letters to evidence the customer has exhausted stage 1 before escalation. Evidence: 5.11.1 – Confirmation of exhausting stage 1
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	No changes to standard, evidence is up to date	All Stage 1 complaints are responded to by our Customer Experience Team. Stage 2 responses are responded to by the Director or Head of Service relating to the complaint. Evidenced through letters. Evidence: • 5.12.1 Review Letter
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	No changes to standard, evidence is up to date	We can evidence that we comply with this through the review tracker. Evidence: • 5.13.1 Review timescales
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two 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 and <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	No changes to standard, evidence is up to date	We have provided a sample letter to show we adhere to this. Evidence: • 5.16.1 Review Letter

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Section 5 - Complaint stages Mandatory 'must' requirements Stage 3				
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	No changes to standard, evidence is up to date	Our complaints process has 2 stages as evidenced in our Complaints Policy Evidence: 5.17.1 Complaints Policy Stages
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 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 	Yes	No changes to standard, evidence is up to date	This is not applicable as we do not have a 3 rd stage of our complaints process
Section 5 - Complaint stages Best Practice Should Stage 1				
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	No changes to standard	We have not extended past 20 days since the code was published however where this should happen, we will always contact the customer to agree this and log the interaction for audit purposes.
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	No changes to standard	We have not extended past 20 days since the code was published however where this should happen, we will advise the customer of their right to contact the IHO.
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	No changes to standard, evidence is up to date	We would do this for all complaints at all stages and can evidence this through our letters. Evidence: <ul style="list-style-type: none"> • 5.4.1 Formal Outcome
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	No changes to standard, evidence is up to date	We can evidence this through complaint letters Evidence <ul style="list-style-type: none"> • 5.7.1 Formal letter
Section 5 - Complaint stages Best Practice Should Stage 2				
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	No changes to standard Recommendation from last year has been implemented (amend policy wording). Evidence: <ul style="list-style-type: none"> • 5.14 Escalation timescales complaints policy, 4.6.3 page 7 (updated) 	We have not had to extend beyond this period since the issue of this code. Should this situation arise will ensure we have agreement with the customer and document this.

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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.		No changes to standard, evidence is up to date	We have not had an extension refused since the code was published however where this should happen we will advise the customer of their right to contact the IHO
Section 5 - Complaint stages Best Practice Should Stage 3				
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.	Yes	No changes to standard, evidence is up to date	This is not applicable as we do not have a stage 3 of our complaints 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.	N/A	No changes to standard, evidence is up to date	This is not applicable as we do not have a stage 3 of our complaints process
Section 6 - Putting things right Mandatory 'must' requirements				
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	No changes to standard, evidence is up to date	We can evidence that our complaint responses are centred on acknowledging where we have gone wrong and the actions taken to put things right Evidence: <ul style="list-style-type: none"> • 6.1.1 Formal Response
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	No changes to standard, evidence is up to date	We can evidence this through review letters. We have a compensation matrix that ensures customers are offered fair recompense for the circumstances in which something has gone wrong Evidence: <ul style="list-style-type: none"> • 6.2.1 Compensation Matrix
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	No changes to standard, evidence is up to date	Our complaint responses clearly outline the steps we will take to put things right. Where further actions are identified to address the issue, we will inform the customer of these actions we will take and by when. Evidence: <ul style="list-style-type: none"> • 5.5.1 Formal Outcome
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	No changes to standard, evidence is up to date	We can evidence this through our compensation matrix. Evidence: <ul style="list-style-type: none"> • 6.6.1 Compensation Matrix
Best practice 'should' requirements				
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	No changes to standard, Evidence: 6.3.2 Case study example (updated)	We identify complaints that have wider implications and pull together a case study of what we can learn

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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	No changes to standard, evidence up to date	We can evidence this through response letters Evidence: • 6.7.1 Legal																				
Section 7 - Continuous learning and improvement - Mandatory 'must' requirements																								
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	No changes to standard, evidence is up to date	The below table evidences where we share complaint learns <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr style="background-color: #800040; color: white;"> <th></th> <th>Main Board</th> <th>Operations Committee</th> <th>Customer Groups</th> </tr> </thead> <tbody> <tr style="background-color: #800040; color: white;"> <th>Customer Insight Dashboard</th> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr style="background-color: #800040; color: white;"> <th>Customer Annual Report</th> <td style="text-align: center;">X</td> <td style="text-align: center;">X</td> <td style="text-align: center;">X</td> </tr> <tr style="background-color: #800040; color: white;"> <th>Complaints Dashboard / Commentary</th> <td style="text-align: center;">X</td> <td style="text-align: center;">X</td> <td style="text-align: center;">X</td> </tr> <tr style="background-color: #800040; color: white;"> <th>Customer Newsletter</th> <td></td> <td></td> <td style="text-align: center;">X</td> </tr> </tbody> </table>		Main Board	Operations Committee	Customer Groups	Customer Insight Dashboard	X			Customer Annual Report	X	X	X	Complaints Dashboard / Commentary	X	X	X	Customer Newsletter			X
	Main Board	Operations Committee	Customer Groups																					
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Customer Annual Report	X	X	X																					
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Customer Newsletter			X																					
Section 7 - Continuous learning and improvement: Best Practice Should																								
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	No changes to standard, or lead responsible for complaints	We have put forward our Executive Director of Operations as the lead responsibility for complaints																				
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	No changes to standard Evidence <ul style="list-style-type: none"> 7.4.1 Performance review of the year (updated) 7.4.2 Board Report, July 2022 (updated) 	We provide regular updates to our board and Committee on our complaints performance																				
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	No changes to standard, evidence is up to date	We discuss themes, trends and case studies with Senior Management, Senior Management also have oversight of all stage 2 complaints.																				

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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	No changes to standard, evidence is up to date	Our policy includes this information Evidence <ul style="list-style-type: none"> • 7.6.1 Complaints policy, Page 4 section 4.1.1-4.1.3
Section 8 - Self-assessment and compliance Mandatory 'must' requirements				
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	No changes to standards. Assessment will be published in 2023.	We publish our compliance against the code in October 2022
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	No changes to standard We have not had any significant restructures or process changes since our last self assessment in October 2023.	We have not had any significant restructures or process changes since the new code was published in April 2022
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	No changes to standard. The outcome of our self assessment will be sent to our governing body on 27.09.2022 Compliance with the IHO code is published on our website.	The outcome of our self assessment will be sent to our governing body on 28.09.2022 Compliance with the IHO code is published on our website. We are working with our customers to ensure compliance with the newer code which will be made available on our website on 31 st October 2023