

Self-assessment against Housing Ombudsman's Complaint Handling Code

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Please see extract below from Complaint Policy 'Definition of a Complaint 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 | Please see extract below from Complaints Policy: A complaint can be by a resident, customer or a third party such as an advocate who has been authorised to make a complaint on their behalf. SLH will accept complaints from family members, carers, power of attorney's, solicitors or advocates if a persons disability or mental capacity is a barrier. Complaints are also accepted via a local councillor, and UK MP or from the Tenants' Committee. All complaints will be investigated in accordance with this policy. Complaints can be made in person, via email, telephone, letter or through any other communication channels such as the SLH My Account App, website or social media. Any complainants via social media will be investigated under this policy. All correspondence will be taken offline, and the resident will be encouraged to continue their complaint either by email, telephone or letter. Further information and guidance is available within the SLH Social Media Policy.' |
| 1.6 | ... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | Yes | Please see extract below from Complaints Policy: 'Areas where individuals may express dissatisfaction which would not be regarded as complaints would relate to |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | |

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| 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. | | <p>These situations include: - areas where individuals may express dissatisfaction which would not be regarded as complaints would relate to;</p> <p>An initial request for a service e.g. first reporting a repair or if the matter can be resolved informally,</p> <ul style="list-style-type: none"> • the general law, unless wrongly applied, • persons or bodies over which SLH has no control, • Reports about anti-social behaviour (ASB) are not part of this policy as there is a separate ASB Policy but complaints will be investigated if residents feel that the ASB Policy has not been properly implemented, • SLH's overall policies (e.g. rent levels, allocations policy, maintenance and renewal policies), • Matters which are, or could reasonably be expected to be the subject of court or tribunal proceedings, or which are in the hands of SLH's insurers. We will make clear if this is the case and endeavour to continue to resolve issues where we can. <p>If SLH decides not to accept a complaint a detailed explanation should be provided to the resident setting out the reasons why the matter is not suitable for the complaints process. A resident has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.'</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>Please see extract from Complaints Policy</p> <p>'A very small minority will make complaints that are persistent or unreasonable (also referred to as 'vexatious'). Such complaints are both time consuming, wasteful and divert resources from service delivery. Whilst SLH endeavours to rectify failure or remedy adverse impact, there are occasions when nothing further can be reasonably done to assist or rectify a real or perceived problem.</p> <p>For the purpose of this policy the following definitions of persistent or unreasonable complaints has been determined by SLH:</p> |

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| | | | <p>The repeated and/or obsessive pursuit of:</p> <ul style="list-style-type: none"> • Unreasonable complaints and/or unrealistic outcomes, • Continuing to repeat the same issues despite SLH responses, and • Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness. <p>Where complaints continue and have been identified as persistent or unreasonable in accordance with the criteria above then a Director will determine whether it is a persistent or vexatious complaint and will determine the appropriate action to be taken.</p> <p>The Director will notify the complainants, in writing, of the reasons why their complaint has been treated as persistent or unreasonable and the action that will be taken.</p> <p>The status of a complainant judged to be unreasonably persistent or vexatious and any restrictions imposed on contact will be reviewed by the Director of Business Improvement) after three months and at the end of every subsequent three months within the period during which the restriction is to apply. The complainant will be informed of the result of this review if the decision to apply the restriction to them has been lifted or extended.'</p> |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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>Please see below extraction from our complaints policy:</p> <p>'Areas where individuals may express dissatisfaction which would not be regarded as complaints would relate to; 3 • An initial request for a service e.g. first reporting a repair or if the matter can be resolved informally.'</p> <p>All MP/Councillor or customer enquiries received via the Executive Team will be raised as an Enquiry for a Manager of service area to investigate and respond, unless a service area has been identified, in which case a complaint case will be logged and will follow complaint process. We will respond to all Executive enquiries within 10 working days.</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 | <p>Our transactional complaint survey includes the following information:</p> <p>https://www.southlakeshousing.co.uk/feedback/</p> <p>In addition, the Customer Insight Partner keeps an oversight of customer feedback to ensure customer dissatisfaction is followed up, including offering the customer the opportunity to pursue their dissatisfaction as a complaint.</p> |

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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>Please see extract below from Complaints Policy</p> <p>A complaint can be from a resident. Complaints can be made in person, via email, telephone or through any other communication channels such as social media. An advocate who has been authorised to make a complaint on their behalf. SLH will accept complaints from family members, carers, power of attorney's, solicitors or advocates if a persons disability or mental capacity is a barrier. Complaints are also accepted via "designated persons" such as a local councillor, and UK MP or from the Tenants' Committee. Complaints can also be made online on the SLH website.</p> <p>'Any complainants via social media will be investigated under this policy. All correspondence will be taken offline and the resident will be encouraged to continue their complaint either by email or letter. Further information and guidance is available within the SLH Social Media Policy.'</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 | Our complaints policy is available on our website and a physical copy can be sent by request. Customers are reminded of this option in the annual report which can also be sent via postal. |
| 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 | <p>Please see link below:</p> <p>https://www.southlakeshousing.co.uk/feedback/</p> <p>https://www.southlakeshousing.co.uk/wp-content/uploads/2023/03/Complaints-Policy-1.pdf</p> |
| 2.5 | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, | Yes | Please see extract from the Complaint Policy |

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| | 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. | | <p>'SLH is committed to equality, diversity and inclusion. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household and ensure no-one is disadvantaged in accessing its services or by making a complaint. To this end we will make reasonable adjustments for people. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and:</p> <ul style="list-style-type: none"> • Confirms our commitment to improving accessibility for everybody that we deal with, • Sets out some of the basic principles of our commitment to provide reasonable adjustments for people with disabilities and make such adjustments more widely available, and • Sets out the factors that we will take into account in dealing with requests for reasonable adjustments. To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. Examples of this include: <ul style="list-style-type: none"> • Allowing more time than we would usually for someone to provide information that we needed, • Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event, translation of information • Communication through a representative or intermediary, • Rest or comfort breaks in meetings. <p>The reasonableness of an adjustment will be evaluated against the resource available to our service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.'</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 | The Complaint Policy, process and self-assessment against Complaint Handling Code is published on our website and communicated through customer annual report. A copy can be provided upon request. |

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| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | This information is included in our customer transactional surveys, all stage complaint responses, complaint surveys and annual report. |
| 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 | <p>Please see extract from our complaint acknowledgement template below: 'You can use a representative to deal with your complaint on your behalf if you prefer. You can access our complaints policy which is attached, or you can access it on our website: (Complaints-Policy-1.pdf southlakeshousing.co.uk).</p> <p>If during the complaints process, you can raise additional complaints which will be incorporated into a stage one response if these are relevant and stage one response has not been issued. Where stage one response has been issued or it would cause unreasonable delay to a response, we will log a new complaint.</p> <p>You can always contact the Housing Ombudsman Service at any point during the complaint process for advice and guidance, although they only investigate complaints once we have completed our internal process. Further information is available on the website www.housing-ombudsman.org.uk or telephone 0300 111 3000</p> |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Yes | <p>Please see extract below from Complaint Policy: 'Any complainants via social media will be investigated under this policy. All correspondence will be taken offline and the resident will be encouraged to continue their complaint either by email or letter. Further information and guidance is available within the SLH Social Media Policy.'</p> |

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| | media and how confidentiality and privacy will be maintained. | | We have now fully implemented omni-channel system which enables us to view all customer contacts via different means (telephone, social media, emails) in a centralised place. |
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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 | The Customer First Manager and Customer Insight Partner are assigned to take responsibility and oversight of complaint handling. |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | | <p>The Customer First Manager and Customer Insight Partner have attended Housing Ombudsman Service Complaint Handling workshops/webinars and carried out self-assessments against spotlight and good practice reports.</p> <p>All Managers received guidance on complaint handling in November 2022.</p> <p>All Colleagues receive MGI Customer Service training.</p> <p>Customer Insight Partner will be running refresher training at all team meeting during quarter two (Jul-Sept 2023) to increase awareness the role of Housing Ombudsman Service.</p> |

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| | | | <p>Refresher training for all complaint handlers will be scheduled for 2023/4 which will include the following areas:</p> <ul style="list-style-type: none"> • Complaints policy and process • How to conduct a good complaint investigation • Revised complaint learning loop • Communication guides and writing responses. <p>If any potential conflict of interest is found, a complaint will be passed to a manager of another service area.</p> |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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>The Director of Customer Experience is the Executive Lead overseeing complaint handling.</p> <p>South Lakes Housing has recently undertaken Mary Gobar International (MGI) Customer Service training and deployed Champions across the business who will assist in embedding the principles.</p> <p>In addition, the Customer Insight Partner, Managers and Head of Service will receive regular complaint training and learning loop sessions.</p> |

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>Please see extract below from Complaints Policy:</p> <p>'There are three main stages to the complaint's procedure including an option to refer complaints to the Tenant Complaint Panel. (This is optional and can be bypassed). This ensures that a resident has the opportunity to challenge any decision by correcting errors or sharing concerns via an appeal process. Normally, complainants will move sequentially from stage to stage (i.e. from 1 to 2, 2 to 3,) following the outcome of the previous investigation. There may be rare occasions where complaints can be investigated at stage two if the service manager likely to undertake the stage one investigation has already been involved in trying to resolve the issues perhaps informally. This is to benefit the complainant to avoid unnecessary delay of repetition. The three main stages are;</p> <ul style="list-style-type: none"> • Complaint Acknowledgment & Logged – target response of 5 Working Days <p>The Customer Insight Partner will contact the customer within 5 working days and advise the complaint response will be issued within 10 working days – following the stage one of complaints procedure.</p> |
| 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 | Customer Insight Partner will contact the customer when a complaint is received to understand the complaint and ask the customer what their desired outcome is. This information is shared with the investigation officer who will contact the customer where complaint is unclear and will ask the customer for clarification and full definition is agreed between both parties. |

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| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | <p>SLH Values and Behaviours provide the cultural framework.</p> <p>Our complaints investigations are conducted impartially ensuring we fully investigate all aspects of the complaint and look at all evidence available.</p> <p>All colleagues have received Mary Gobar International – Let's Make It Happen training to enhance positive behaviours and culture.</p> |
| 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>The Customer Insight Partner reviews and allocates all complaints for investigation.</p> <p>All investigations and responses are also overseen by Customer First Manager to provide independent oversight and quality assurance.</p> <p>All stage 1 responses are reviewed by Head of Service and Stage 2 and 3 responses are reviewed by Director of the Service area or Director of Customer Experience.</p> <p>SLH Probity Policy - all colleagues make an annual declaration of any potential conflicts of interest.</p> <p>SLH Data Protection & Data Privacy Policy.</p> |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | <p>The Customer Insight Partner contacts all customers when a complaint is received and SLH will adhere to any reasonable request regarding customer's preference for communication.</p> <p>Please see extract below from Complaints Policy:</p> <p>'SLH is committed to equality, diversity and inclusion. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household and ensure no-one is disadvantaged in accessing its services or by making a complaint. To this end we will make</p> |

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| | | | <p>reasonable adjustments for people. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy.'</p> <p>'To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. Examples of this include:</p> <ul style="list-style-type: none"> • Allowing more time than we would usually for someone to provide information that we needed, • Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event, translation of information • Communication through a representative or intermediary, • Rest or comfort breaks in meetings. |
| 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>As part of complaint investigation, the investigating officer will contact the customer and where applicable any staff member who is the subject of a complaint to ensure they have the opportunity to set out their position and comment on any adverse findings before a final decision is made. Advice would be sought from our People & Culture team if appropriate.</p> |
| 4.13 | <p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint</p> | Yes | <p>Please see extract below from complaint response templates</p> <p>'If you remain dissatisfied, you have a right of appeal and should reply within 28 days explaining why you remain dissatisfied and what redress you are seeking as an outcome. Your complaint will then be escalated and reviewed at Stage Two of our complaint's procedure.'</p> <p>'If you remain dissatisfied, you have a right of appeal either through our Tenant Complaint Panel or through the Housing Ombudsman. If you wish for your complaint to be reviewed by our complaint panel, you should reply within 28 days explaining why you remain dissatisfied and what redress you are seeking as an outcome.'</p> |

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| 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 | Please see extract below from Complaints Policy: 'If SLH decides not to accept a complaint a detailed explanation should be provided to the resident setting out the reasons why the matter is not suitable for the complaints process. A resident has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.' |
| 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 | This information is stored in case management module of the Housing Management System (CX Civica) within workflow, and all notes and contacts are updated by the Customer Insight Partner. Please see extract below from Complaints Policy: 'All complaints are logged on the Civica Cx Housing Management System and investigation outcomes recorded as; upheld, not upheld or partially upheld.' |
| 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 | Please see extract below from Complaints Policy: A very small minority will make complaints that are persistent or unreasonable (also referred to as 'vexatious'). Such complaints are both time consuming, wasteful and divert resources from service delivery. Whilst SLH endeavours to rectify failure or remedy adverse impact, there are occasions when nothing further can be reasonably done to assist or rectify a real or perceived problem. For the purpose of this policy the following definitions of persistent or unreasonable complaints has been determined by SLH: The repeated and/or obsessive pursuit of: <ul style="list-style-type: none"> • Unreasonable complaints and/or unrealistic outcomes, • Continuing to repeat the same issues despite SLH responses, and 7 |

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| | | | <ul style="list-style-type: none"> • Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness. Where complaints continue and have been identified as persistent or unreasonable in accordance with the criteria above then a Director will determine whether it is a persistent or vexatious complaint and will determine the appropriate action to be taken. <p>The Director of Customer Experience will notify the complainants, in writing, of the reasons why their complaint has been treated as persistent or unreasonable and the action that will be taken.</p> <p>The status of a complainant judged to be unreasonably persistent or vexatious and any restrictions imposed on contact will be reviewed by the Director (Business Assurance) after three months and at the end of every subsequent three months within the period during which the restriction is to apply. The complainant will be informed of the result of this review if the decision to apply the restriction to them has been lifted or extended.'</p> |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | <p>The Customer Insight Partner will manage customer expectations from acknowledgement stage and investigation officer throughout the complaint. We contact the customer in their preferred method of communication and log each contact in Housing Management System (CV Civica).'</p> <p>Managers all receive complaint handling training.</p> |

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| 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 | Upon initial contact from the customer, the investigating officer will confirm the scope of the complaint, ask what resolution the complainant is seeking and ascertain whether there are any urgent actions required and when will they be in next in touch. We ensure all evidence and information is thoroughly investigated and aim to achieve our target timescales and share the complaint outcome as soon as possible, ensuring a full investigation has been completed. |
| 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 | Please see below extract from Complaints Policy: 'A complaint can be by a resident, customer or a third party such as an advocate who has been authorised to make a complaint on their behalf. SLH will accept complaints from family members, carers, power of attorney's, solicitors or advocates if a persons disability or mental capacity is a barrier. Complaints are also accepted via a local councillor, and UK MP or from the Tenants' Committee. All complaints will be investigated in accordance with this policy.' 'Customers are welcome to bring an advocate or representative to any meetings.' |
| 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 | Where appropriate the investigating office will include reference to and include policies that cover our legal obligations to ensure customers understand our decisions and actions. We would also refer to any obligations residents may have, such as this in the tenancy agreement. |
| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Particular members of staff or contractors are not generally referred to in responses but are referred to by role/ company. There will be times when it is appropriate to refer to relevant discussions and provide contact details for colleagues. Where a complaint is about a named colleague or contractor we will name the colleague or contractor, however, will not name a colleague or contractor where it is not appropriate. |

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| | | | As part of complaint investigation, the investigating officer will meet with any colleague referred to and provide them with the opportunity to set their position and given the opportunity on any adverse findings before a final decision is made. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | <p>The investigating officer will contact the customer on regular basis to keep the customer updated on the progress of the investigation. This will be updated on Housing Management System (CX Civica).</p> <p>Please see below extract from Complaints Policy:</p> <p>‘As part of the complaint policy the customer shall be given a fair opportunity to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made.’ |
| 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 request customer feedback from all customers who raise a complaint with us. Once the complaint is resolved, we send a transactional survey via Survey Monkey platform. Feedback is reviewed by the Customer Insight Partner and shared as appropriate. |
| 4.17 | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained | Yes | <p>Complaints provide valuable feedback and an opportunity to learn.</p> <p>The investigating officers are supported by the Customer Insight Partner and Customer First Manager, during the complaint investigation to provide advice and quality assurance and identify learning.</p> <p>Managers are provided with training and guidance on complaint handling and feedback on learning.</p> <p>Regular complaint refresher is delivered to all complaint investigating officers. Refresher training for all complaint handlers will be scheduled for 2023/4.</p> |

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| 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 | Please see below extract from Complaints Policy: Where complaints continue and have been identified as persistent or unreasonable in accordance with the criteria above then a Director will determine whether it is a persistent or vexatious complaint and will determine the appropriate action to be taken. The Director of Customer Experience will notify the complainants, in writing, of the reasons why their complaint has been treated as persistent or unreasonable and the action that will be taken. The status of a complainant judged to be unreasonably persistent or vexatious and any restrictions imposed on contact will be reviewed by the Director (Business Assurance) after three months and at the end of every subsequent three months within the period during which the restriction is to apply. The complainant will be informed of the result of this review if the decision to apply the restriction to them has been lifted or extended.' |
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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 |
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| 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 | Please see extracts below from our Complaints Policy: 'Stage 1: Manager Review – target response of 10 working days once you have received the acknowledgement response.' 'Stage one decision – 10 working days from acknowledgement – if this is not possible, an explanation and a date by when the stage one response should be received. This should not exceed a further 10 days without good reason.' |

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| 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 | All outstanding actions are detailed in the complaint response with a completion date. These are tracked by Customer Insight Partner. When the completion date nears, they liaise with the investigating officer to ensure the actions are completed. |
| 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 | <p>As part of complaint investigation, the investigating officer will ensure all the elements of the complaint are investigated, providing clear reasons for decision and referring to relevant policies, law and good practices where appropriate.</p> <p>The Customer Insight Partner or Customer First Manager reviews investigations and responses before they are issued.</p> |
| 5.8 | <p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <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 | <p>Please see below extract from Complaints Policy:</p> <p>At the completion of each stage of the complaints process SLH will write to the resident advising them of the following:</p> <ul style="list-style-type: none"> • the complaint stage • the outcome of 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 if dissatisfied. <p>Templates provide a framework to ensure key information is included.</p> <p>All colleagues have undertaken Mary Gobar International (MGI) customer service training to ensure communication with customers is open, clear and accessible.</p> |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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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 | We provide the customer the opportunity to appeal and escalate their complaint as part of our complaint response at stage one and two. We also advise the customer throughout the complaints process that they can approach Housing Ombudsman Service for any advice and guidance. |
| 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 | When any complaint is escalated we clarify the scope of escalation which will help us to determine if the customer is unhappy with all or part of the original complaint. Customer will also be contacted to seek clarification where we are unsure. |
| 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 | Our policy clearly sets out that complaint can only be escalated once stage one complaint investigation has been completed or at the customer's request. |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | All stage two complaints are investigated by a Director, or a Head of Service, in their absence. |
| 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 | Please see below extract from Complaints Policy: 'Stage two response – 20 working days from request to escalate – if this is not possible an explanation and a date when the stage two response will be received. This should not exceed a further 10 working days without good reason.' |

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| 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>Please see below extract from Complaints Policy:</p> <p>At the completion of each stage of the complaints process SLH will write to the resident advising them of the following:</p> <ul style="list-style-type: none"> • the complaint stage • the outcome of 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 if dissatisfied. <p>Templates provide a framework to ensure key information is included.</p> <p>All colleagues have undertaken Mary Gobar International (MGI) customer service training to ensure communication with customers is clear and accessible.</p> |
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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. | Yes | <p>There is an optional stage 3 for customers to ask for a Tenant Panel to review their complaint. This was agreed with our Tenants' Committee. Customers can escalate the complaint to the Housing Ombudsman Service at the end of stage two if preferred.</p> <p>The role of Tenant Panel is detailed in the Complaints Policy. Please below extract from Complaints Policy: 'Complainants may wish to refer their complaint to the Tenants' Committee Tenant Complaints Panel. The Panel will receive appropriate training and support to investigate a complaint and to</p> |

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| | | | <p>adhere to data protection protocols. This can include an SLH member of staff or an Independent Tenant Advisor. The Tenants' Committee will agree the Complaints Panel membership at the AGM. Tenant Board Members cannot be on the Panel. Their remit includes making decisions on complaints and making recommendations to SLH. SLH will consider their findings seriously and, although not binding on SLH, will ensure that these are taken into consideration and documented should these be taken into account at a later stage. The Tenant Complaint Panel have no remit to investigate disciplinary matters, and these will be referred to the Head of People and Culture. The panel can make recommendations to the Chief Executive in relation to compensation.'</p> |
| 5.20 | <p>Landlords must confirm the following in writing to the resident at the completion of stage three 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | Yes | <p>Please see below extract from Complaints Policy:</p> <p>'At the completion of each stage of the complaints process SLH will write to the resident advising them of the following:</p> <ul style="list-style-type: none"> • the complaint stage • the outcome of 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 if dissatisfied.' |

Best practice 'should' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 5.2 | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | <p>Please see below extract from Complaints Policy:</p> <p>'Stage three response – Tenant Complaint Panel - a response should be sent within 20 working days from request to escalate. Any additional time will only be justified if related to convening a panel. An explanation and a date when the stage three response will be achieved will be provided to the resident.'</p> <p>We aim to agree any extension with the customer.</p> |
| 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 | If we are not able to reach agreement on any extension period we provide the contact details of Housing Ombudsman Service to the customer. |
| 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 | <p>Where we identify or are informed by the customer that a recurring issue arises, we will take into consideration any older reports as part of complaint investigation.</p> <p>We also share learning with the relevant manager and/or the Head of Transformation, Digital and Data to consider service or process improvements, where possible.</p> |

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| 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 | We will investigate any additional complaints during the complaint investigation, and they are incorporated in the stage one response if not already issued. Where it has been issued or would cause an unnecessary delay to the customer we will log a new complaint and inform the customer. |
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Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | <p>Please see below extract from Complaints Policy: ‘Stage two response – 20 working days from request to escalate – if this is not possible an explanation and a date when the stage two response will be received. This should not exceed a further 10 working days without good reason.’</p> <p>If these timescales cannot not achievable, the Director (Head of Service, if Director is unable) will keep the customer informed of the reasons and provide and agree revised timescales. This should not exceed further 10 working days without a good reason and in agreement with the customer.</p> |
| 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 | We will provide the contact details of Housing Ombudsman Service to the customer, if we are not able to reach the agreed extended period. |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.18 | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | Yes | Please see below extract from Complaints Policy: 'Stage three response – Tenant Complaint Panel - a response should be sent within 20 working days from request to escalate. Any additional time will only be justified if related to convening a panel. An explanation and a date when the stage three response will be achieved will be provided to the resident.' |
| 5.19 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | Yes | We will provide the contact details of Housing Ombudsman Service to the customer, if we are not able to reach the agreed extended period. |

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 | The investigating officer will acknowledge and apologise where something has gone wrong and set out the actions they intend to take (already taken) to put things right. All colleagues have received Mary Gobar International (MGI) customer service training and are empowered to put things right. |

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| 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>From the receipt of complaint, the Customer Insight Partner will acknowledge the complaint and carefully manage the expectations of customers ensuring that no promises are made on things we cannot deliver or would cause upset to other customers. At all complaint stages the investigating officer will continue to manage customers' expectations.</p> <p>Where a service failure has been identified, we may offer compensation.</p> <p>Please see below extract below from Complaints Policy:</p> <p>'In the vast majority of cases, SLH will offer an apology as a means of concluding a complaint investigation. In rare exceptions, compensation can be awarded on the following grounds (up to a maximum £250 per claimant); compensation will be approved by the Investigators Manager/Director'</p> |
| 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 | <p>We aim to agree the remedy and any timescales with the customer before issuing the response.</p> <p>Our complaint responses and training reflect this. The investigating officer will take ownership of completing of any actions identified.</p> <p>Please see extract below from Complaints Policy:</p> <p>'In the vast majority of cases, SLH will offer an apology as a means of concluding a complaint investigation. In rare exceptions, compensation can be awarded on the following grounds (up to a maximum £250 per claimant); compensation will be approved by the Investigators Manager/Director.'</p> |
| 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 | Yes | <p>Please see below extract from Complaints Policy:</p> <p>'In the vast majority of cases, SLH will offer an apology as a means of concluding a complaint investigation. In rare exceptions, compensation can be awarded on the following grounds (up to a</p> |

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| | resident has been put to as well as any distress and inconvenience caused. | | maximum £250 per claimant); compensation will be approved by the Investigators Manager/Director.' |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 6.3 | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents. | Yes | <p>Please see below extract from Complaints Policy:</p> <p>'Lessons learnt are captured at the end of every complaint and logged within the quarterly complaints tracker to show how SLH is using complaints to drive improvements and learning. This is considered by the internal Customer Feedback Group and Tenant Complaint Panel. This is a key feature of the Resident Engagement Strategy. Lessons learned are reported to Board as part of the quarterly performance reports and a summary published within the annual tenant report.'</p> <p>We also share learning with the relevant manager and/or the Head of Transformation, Digital and Data to consider service or process improvements, where possible.</p> <p>Our behaviours, culture and Mary Gobar International (MGI) customer service training support us to value and learn from complaints.</p> |
| 6.7 | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | Yes | We aim to resolve all complaints and will obtain legal advice from our Solicitors where appropriate to try and reach a suitable resolution. |

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 | Complaint learning and service improvements are shared with customers groups: Tenant Committee and Scrutiny Panel and in the Annual Report. Learning is also shared with ELT, Board and Managers via the Quarterly Performance report. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | In addition, to providing regular update on complaints performance and learnings, a Board member has been appointed to have lead responsibility for complaints to support positive complaint handling culture. |
| 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, | Yes | Board receive regular updates on complaints and handling performance via the Quarterly Performance report. CEO provides regular updates to Board on HOS casework and spotlight reports. Self-Assessment v Damp & Mould reported to Board. Board are informed of any cases investigated by HOS and the outcome. |

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| | <ul style="list-style-type: none"> • 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>Although we have not received any Housing Ombudsman severe maladministration or referral to regulatory bodies over the last 12 months, we would report such to Board who would oversee the implementation of management responses.</p> <p>Annual Self-Assessment against the Complaint Handling Code is reported to Tenants' Committee and Board for scrutiny and challenge.</p> |
| 7.5 | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training. | Yes | <p>The Customer First Manager oversee complaint trend analysis and works closely with Head of Transformation, Digital and Data to identify any service, policy or process improvements and training.</p> <p>Where we have identified a policy and procedure requires revising, we will make sure this is implemented and colleagues/ contractors are aware of the changes.</p> |
| 7.6 | <p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes | <p>Embodied in SLH Behaviours:</p> <ul style="list-style-type: none"> • Genuinely care • Take responsibility • Have respect • Be adaptable • Work together • Be curious • Make it happen • Always improving <p>Please see below extract from Complaints Policy:</p> |

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| | | | <p>‘Complaint handling performs an important strategic role for an organisation, providing vital intelligence and assurance on its health, performance and reputation. The Complaints Policy aims to provide a high-level framework to support consistent and effective handling and uses learning to improve customer experience. The Policy also promotes the use of complaints data alongside other management information on stock, services and customer feedback to provide insight into the organisation.’</p> <p>All colleagues have received Mary Gobar International (MGI) customer service training which embeds positive mindset, language and culture of taking ownership and responsibility for your actions and mistakes and contribute to putting things right.</p> |
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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 | Annual Self-Assessment completed by Customer First Manager and reported to Tenants Committee and then Board as part of August legal and regulatory compliance report. |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | We have not undertaken any significant restructures over the last year. |
| 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 | Yes | Annual Self-Assessment completed by Customer First Manager and reported to Tenants Committee and then Board as part of August legal and regulatory compliance report, before being published on our website and in the customer annual report. |

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| | <ul style="list-style-type: none"> • 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 | | |
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