

The Housing Ombudsman published a new Complaints Handling Code in July 2020, which was then updated in March 2022, setting out good assessment against the code's key complaint handling principles. The code also requires landlords to complete a self-assessment following any changes in procedures and to carry out an annual self-assessment. Following an amendment to our policy and procedures, we have completed a new self-assessment which you can find below. Homes Plus now intends to complete this exercise annually. Our group of involved customers, who sit on our Scrutiny Panel, have been invaluable in supporting us in providing an honest account of our progress.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	This is the definition used within our complaints policy .
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	This is covered in our complaints policy.
1.6	Chasers on service requests can often be resolved "there and then"....and may not need to enter the complaints system..... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	The complaints policy sets out what we accept as a complaint. Training is provided to customer services and complaint handlers on the difference between a service request and a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	A full list of exclusions is detailed in our complaints policy.

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	A full list of exclusions is detailed in our complaints policy.
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	This is covered in our complaints policy and in the guidance for staff on complaint handling.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Customer services staff and complaint handlers are trained to deal with service requests and our training provides more information regarding the difference between service request and a complaint.
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	Officers who carry out our surveys will direct customers on how to make a complaint if the customer shows dissatisfaction during a survey. This has been provided as training. Scrutiny panel members will identify if there is an issue with this not being completed to monitor.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Details of how customers can complain is stated on our website and in our complaint policy and in the 'How to make a complaint leaflet'.
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 complaint policy and 'How to make a complaint' leaflet outlines this. These are also published on our website.
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	We have a complaints page on our website that includes our complaints policy and how to make a complaint.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Our complaints policy outlines this. We have also provided training to our complaint handlers.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	This is published on our website , in posters, leaflets and in our newsletters. A standard paragraph goes in each newsletter to residents and in the annual report providing this information.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular	Yes	This can be found on our website and updates are in our newsletters to customers

	correspondence with residents.		and in information leaflets that go with every stage 1 acknowledgement letter.
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	An information leaflet on how to access the ombudsman goes out with all stage 1 acknowledgement letters.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	See our complaints policy.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	A dedicated Complaints Team exists comprising of a Complaints Manager Complaint Coordinator x 2 Senior Complaints Investigation Officers x 2 Complaints Improvement and Insight Officer. Performance reports go to the Board quarterly and in-depth complaints report every six months (half year and annual report).

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of	Yes	All complaints handlers receive training, and this is covered in that training.
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>All complaints handlers receive training, and this is covered in this training module.</p> <p>Complaints can also be referred into the Service Improvement Committee.</p> <p>Head of Services sign off stage 1 complaints and Directors sign off Stage 2 complaints.</p>

Best practice 'should' requirements

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>This is covered in our complaints policy.</p> <p>All complaints handlers receive training, and the importance of record keeping is covered in this module.</p> <p>Quality audits and internal audits are carried out and this is picked up through those audits.</p> <p>Managers complete regular one to ones where complaints handling is discussed.</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	Our acknowledgement letters have been updated to ensure this is included. Internal audits are completed, and this would be picked up.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All complaints handlers receive training, and this is covered in this module. Complaint responses are signed off by a senior manager. Complaint responses are quality checked by the Complaints Team before sending to the customer. Managers complete regular one to ones where complaints handling is discussed.
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	The Complaints Team know not to log a complaint to someone named in a complaint. All complaints handlers receive training, and this is covered in this training module. Managers complete regular one to ones where complaints handling is discussed. Complaints are also subject to regular internal audits.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	This is covered in the complaints policy. Also, all complaints handlers receive training, and this is covered in this training module.

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	All complaints handlers receive training, and this is covered in this training module.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes	Please refer to our complaints policy.
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	This is covered in our complaints policy.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	A full record is kept of the original complaint, date received, any review, correspondence with the resident, response to resident. This is monitored through regular quality audits of files.
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	A new Unreasonable Complainant Behaviour policy was agreed at Board to take effect from 1 October 2022. A copy can be found on our website.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	Investigating officers are required to contact the resident within 2 working days of receipt of the complaint to discuss outcomes and manage expectations. This is covered in both the guidance on investigating complaints and in the training.
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	Customer services will try and resolve the issue prior to it becoming a complaint but if it cannot be resolved or the customer wishes to make a complaint this will be logged. Customer services are trained on this. Investigating Officers will try and resolve the complaint at the earliest opportunity.
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	This is covered in our complaints policy.
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	All complaints handlers receive training, and this is covered in this training module.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	All complaints handlers receive training, and this is covered in this training module.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	All complaints handlers receive training, and this is covered in this training module.

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	Customer satisfaction surveys on complaint handling are completed and monitored monthly. We have a performance target to hit 60% with customer satisfaction. We are above this currently at 79% year to date (as of Nov 22). The Scrutiny Panel also take part in workshops to shape policies and procedures.
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	Training is provided to ensure staff are engaged in the complaints process. We have a service improvement committee that reviews complaints.
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	A new Unreasonable Complainant Behaviour policy was agreed at Board to take effect from 1 October 2022.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	We have a performance target to respond to 85% of complaints within 10 working days of it being logged and acknowledged. Complaints can only be extended if they meet the extension criteria outlined in our complaints policy. Responses within the 10 working days are above this target year to date (as of Nov 22).

5.5	<p>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.</p>	Yes	<p>All complaints handlers receive training, and this is covered in this training module.</p> <p>A process is now in place to monitor remedies and provide regular updates on outstanding actions.</p>
5.6	<p>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.</p>	Yes	<p>All complaints handlers receive training, and this is covered in this training module.</p> <p>Complaint responses are quality checked by the Complaints Team before sending out.</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>All complaints handlers receive training, and this is covered in this training module.</p> <p>Complaint responses are quality checked by the Complaints Team before sending out.</p>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	This is covered in our complaints policy.
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	Officers investigating stage 2 complaints call the customer to discuss their stage 2 complaint prior to commencing investigation. This is covered in our policy and procedures.
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	We already adopt this process. This is documented in the staff complaints handling guidance.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are conducted by senior complaint investigation officers within the complaints team.
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	This is covered in our complaints policy. We have a performance target to respond to 85% of stage 2 complaints within 20 working days. Year to date (as of Nov 22) we were hitting the 85% target.

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 stages • 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>All complaints handlers receive training, and this is covered in this training module.</p> <p>Complaint responses are quality checked before sending out. We use a response template that has prompts to ensure these items are covered and they include a standard paragraph on how to escalate a complaint.</p> <p>We have no third stage.</p>
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Stage 3

Code section	Code requirement	Comply :Yes/No	Evidence, commentary and any explanations
5.17	<p>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.</p>	Yes	There is no third stage.
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 	n/a	There is no third stage.

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	This is in the new complaints policy that a director will call the customer to agree any further extensions beyond 20 working days.
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	This is in the new complaints policy that a director will call the customer to agree any further extensions beyond 20 working days.
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	This is covered in the complaints handling guidance to staff.
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	This is covered in the complaints handling guidance to staff.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is written into the complaints policy.
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	This is written into the complaints policy.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	n/a	There is no third stage.
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	There is no third stage.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	All complaints handlers receive training and this is covered in this training module.
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	This is also covered in our compensation policy which was reviewed and published on our website on 1 November 2022.
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	All complaints handlers receive training and this is covered in this training module. All complaint responses and remedies are also now checked by a senior manager. Head of Service at stage 1 and Director at stage 2.
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	A compensation policy is in place and published on our website.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	We have a monthly service improvement committee that reviews complaints. We have appointed a Complaints Improvement and Insight Officer who will lead in identifying learning and service improvement.

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 provide training to staff on providing remedies and this is also covered in the Compensation policy.
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Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Learning is reported as part of the half year and annual complaints report.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Chair of the Homes Board has been appointed to have lead responsibility.

7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Performance targets are reported to board quarterly with a fuller complaint report every 6 months i.e., half year and year end.
7.5	<p>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.</p>	Yes	<p>Monthly complaints reports are provided to senior management which include themes and trends.</p> <p>High risk cases and themes are brought to the monthly Service Improvement Committee.</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	This has been added into the complaints awareness training that is mandatory for all staff.

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	Self-assessment completed in 2020 and published. This one is for 2022.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Agreed this will be done.
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	Self-assessments are reported to Board and then published on our website.