

54North Homes Complaint Handling Code Self-Assessment Form 2023

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	Within our Complaints, Compliments and Suggestions Policy, supporting procedure for colleagues and Customer Leaflet.
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	Within our updated complaints policy and procedure this is clear, and this was also reiterated during colleague training delivered in 2023.
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	Within our Complaints, Compliments and Suggestions policy and procedure this is clear, and this was also reiterated during colleague training during 2023.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Within our Complaints, Compliments and Suggestions policy and procedure we clarify our position.
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	Within our policy and procedure, we outline matters not considered complaints, including service requests or services which have their own appeals process. Plus, in these documents and our customer leaflet we provide guidance on Service Requests and Make It Right (which is our fast, informal resolution process).
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	If we are unable to accept a complaint, a written response is provided to the customer with Ombudsman details included in this response.

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	Definitions of Service Requests and Make It Right are provided within our Complaints, Compliments and Suggestions policy and procedure and for customers in our customer leaflet. Our systems are also designed to record the difference between these.
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	During our transactional and perception surveys, conducted by a third party, customers are offered to request contact with 54North Homes to pursue any issues, by requesting a follow up.

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	Our Complaints, Compliments and Suggestions policy and procedure, plus customer leaflet all illustrates all the various channels open to customers to make a complaint. This does include in person, telephone, in writing, social media direct messaging and by email.
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, Compliments and Suggestions policy is available online, or in print on request. We also provide a complaints leaflet to explain the policy in simpler terms, and this is also available in a plain text version. A translation service is also available upon request. Large text or braille can be organised upon request. We have an audio-visual version. All definitions, the stages and how they work, how customers transition between stages and all timeframes are included. We also have a simple infographic for customers to simplify the process and stages.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and	Yes	We have a dedicated section on our website for complaints. This includes our Complaints, Compliments and Suggestions policy,

	process must be easy to find on the website.		customer leaflet, and infographic to explain how it works. This is easily accessible through a search plus we publish a quick link to this page on our letters.
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, Compliments and Suggestions policy and procedure have dedicated sections to Equality and Diversity. To support the individual assessment of a customer's needs, it also presents a non-exhaustive list of reasonable adjustment options which could be considered. Complaint handlers training delivered in 2023 covered our policy.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	We promote our complaint policy, the code and ombudsman through our customer magazine, customer email and website. We also offer a leaflet and infographic.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Ombudsman details are provided in stage 1 and stage 2 response letters, in our customer leaflet and on our website.
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	Our Complaints, Compliments and Suggestions policy and procedure clearly lays this out, as does our complaint leaflet, and infographic. We also provide Ombudsman details in stage 1 and stage 2 response letters and the customer's right to access the Ombudsman service throughout.

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	Our Complaints, Compliments and Suggestions policy and procedure confirms we accept complaints from social media, using X (previously branded Twitter) Direct Message and Facebook Messenger. Using direct messaging ensures confidentiality and privacy. These are routed into our Customer Experience team who handle as we would any other complaint.

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	We have a Customer Experience Manager and Customer Experience Officer who support named case handlers. Case handlers are assigned according to the nature and stage of the complaint. We provide quarterly reporting into our Customer Experience Committee, which includes board member who are delegated to focus on customer activity. We also provide a quarterly Complaint report to our Board.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our Complaints, Compliments and Suggestions policy and procedure lays out how we ensure there is no conflict of interests e.g., they would not investigate a complaint about themselves or would not hear both a stage 1 and 2. We provide complaint handling skills learning materials through our learning management system to all case handlers.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	We provide complaint handling skills learning materials through our learning management system to all colleagues. We also have defined colleague behaviours specifically regarding how we behave with customers. As our case handlers are within our service areas, they have access to quick resolution and the authority is made clear at each stage of the complaint.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	54North Homes seeks to understand the outcome a customer is looking for and work with them to find a mutually agreeable solution, at both stages of our 2-stage process. During stage 2 our Complaints, Compliments and Suggestions policy and procedure also includes a question seeking the customer's desired outcome and a discussion prior to the investigation, whilst this is not compulsory. Our systems are designed to capture this information and guide colleagues through the timelines. We do not have pre complaint stage, whilst we have a Make it Right - which is our fast, informal resolution process outside of the complaint process. Our policy and procedure is aligned to the Code to provide an acknowledgement within five days of receipt.
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 complaints handling system, has letter templates. The acknowledgement template includes a Complaint summary. If this is unclear, we seek further clarification. At stage 2 we also provide the customer with questions whilst not compulsory, to clarify what they are unhappy with, the reason and what they would like us to do. This is also logged in our complaint system.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our policy and procedure outline how the investigation is impartial, e.g., case handlers would not investigate a complaint about themselves or hear both stage 1 and 2.
4.7	The complaint handler must: <ul style="list-style-type: none"> deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Our Complaints, Compliments and Suggestions procedure outlines the various role of colleagues which are involved in complaints. Supporting the best practice outlined here.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency	Yes	We use a customer's preferred method of communication. We also share how we will communicate with them and when asked

	and method of communication		we will adapt. Our policy and procedure outlines examples of how we might adapt to suit customer's needs.
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	Case handlers discuss with a customer the nature of their complaint at stage 1. A conversation is requested with the customer in stage 2 to allow them to share their position in person before the investigation. Where a complaint involves a colleague, interviews are conducted to present their position and offer further information, after which findings are shared.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Within our policy we advise customers they have 12 months to escalate to stage 2, whilst we ask for this sooner so we can act swiftly. We also share this in stage 1 response letter and in our complaint leaflet and video.
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	We ask customers to answer 3 escalation questions before escalating to stage 2, whilst not compulsory. If they do not answer the questions, we would ask again. If this was not available we will conduct this on the information available. If we were to refuse to escalate, we would explain in writing, including guidance on next steps. We also articulate in our policy where we would not accept a complaint such as matter being dealt with through legal action.
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	All complaint information is recorded in one place on our complaint system.
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	We have an Unacceptable Customer Behaviour policy and procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	Colleagues endeavour to manage customer expectations, in particular being clear from the outset if a request for resolution is unreasonable.
4.4	A complaint should be resolved at the earliest possible	Yes	We endeavour to complete a complaint investigation within the

	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.		Ombudsman Code guidelines of 10 working days and 20 working days for stage 1 and stage 2 complaints respectively. They may also need an extension in line with the Code. It may be actions remain after the complaint is responded to and the Lead is expected to oversee this. Where possible the case handler will take actions before all these dates.
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 within our Complaints, Compliments and Suggestions policy and reflected in the customer leaflet and video.
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 this is the case, we make this clear, for instance where we and the customer are obliged to complete Gas safety tests.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Where this is appropriate, we'll name an individual, perhaps in naming who may be visiting the customer. However, we would not name people when it's not relevant or appropriate, such as where a complaint is about this individual.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our policy and procedure support this behaviour. Complaint handlers provide contact details so they may be contacted during the complaint. Handlers also let customers know when they will next update them.
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	In our Tenant Satisfaction Survey and ICS survey, we ask customers about their satisfaction with our complaint service. This information is shared with colleagues and in team meetings we establish actions on these learnings.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	We have formal complaint case learning meetings which establish what we can share as good practice and developmental opportunities. We have wellbeing support available to all colleagues. Complaint learning is shared on our website and our intranet and shared in quarterly and annual reports.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	We completed an Equality Impact Assessment to ensure that in our Unacceptable Customer Behaviour policy, consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

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	Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video we express our aim to respond in 10 working days. We also explain how if we need more time, we will agree this with the customer and share this in writing, this is aligned to the Code's guidance.
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	Within our Complaints, Compliments and Suggestions policy and procedure and all subsequent training, we reiterate the importance of responding to the complaint when the answer is known. On rare occasions, customers insist that complaints are held open and letters are not sent whilst actions remain, here we would have explained the outcome, but the letter would follow in line with their request.
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	Letter templates prompt and provide guidance to ensure all points raised are responded to and the rationale for decision are presented.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them.

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions.
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	Our extension letter template includes the Housing Ombudsman contact details.
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	All complaint details are captured on our complaints system so this can be achieved.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Our Complaints, Compliments and Suggestions policy and procedure explains this.

Mandatory 'must' requirements

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, including transition between stage and exclusions. Our customer leaflet also explains the transitions between stages and their right to approach the Ombudsman.

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	A summary is provided within the acknowledgement letter template. We also ask customers to explain their reason for escalating their complaint using 3 questions, whilst not compulsory. Furthermore, the customer is invited to discuss their complaint with the case handler before the investigation takes place.
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 Complaints, Compliments and Suggestions policy and procedure, stage 1 letter template, plus our customer leaflet and explains this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Our Complaints, Compliments and Suggestions policy and procedure plus our customer leaflet explains this.
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	Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video outline we will respond in 20 working days as noted in the code. We also explain how if we need more time, for good reason, how we will share or agree this with the customer and share this in writing.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them. We do not operate a 3 rd stage.

Best practice 'should' requirements

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions.
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	Our extension letter template includes the Housing Ombudsman contact details.

Mandatory 'must' requirements

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.

Best practice 'should' requirements

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.	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.
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 currently only have two formal complaints stages – stage 1 and stage 2.

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which prompts this.
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	Our Complaints, Compliments and Suggestions procedure explains this. Customers are offered compensation where appropriate and our Compensation and Goodwill policy guides colleagues to provide a fair and reasonable remedy.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which

	appropriate. Any remedy proposed must be followed through to completion.		prompts this.
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	Our Compensation and Goodwill policy explains this.

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	Offer of redress and learnings are provided in both upheld and not upheld complaints. Learnings from individual complaints can lead to resolution for other customers, where considered relevant.
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	Our Compensation and Goodwill policy explains this.

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	We publish complaint learnings on our website and intranet. We also share more periodically through our customer magazine and annual report. A quarterly report is provided to our Customer Experience Committee, and our Board. Complaints are discussed monthly at our Executive Leadership team meetings.

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	Yes	Our Customer Experience Committee that includes customers and Board members has responsibility for complaints. This

	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.		Committee has responsibility for ensuring that our Board receives regular and timely information about complaints and complaint handling performance.
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	<p>We provide quarterly reporting into our Customer Experience Committee, which includes board member who are delegated to focus on customer activity. We also provide quarterly complaint handling reports to our Board. This includes:</p> <ul style="list-style-type: none"> • statistical data on complaints as listed • details on all cases heard by the Ombudsman • Ombudsman activity includes Code changes • Complaint learning activity and findings • Audit or risk activity relating to the complaints service • An update on initiatives and progress <p>Furthermore, we established an Ombudsman case KPI which is reported to Leaders monthly and the Board quarterly.</p> <p>The annual self-assessment is shared with our Customer Experience Committee.</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	The quarterly reporting provides theme and trend analysis into our Customer Experience Committee and our Executive Leadership team and our Board for oversight. Our Executive Leadership team has responsibility for policy and performance to act as appropriate, including training.
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 	Yes	<p>Our vision, values and behaviours are well communicated to colleagues and embedded in our culture through communication and leadership. Our behaviours include those specific to how we interact with our customers.</p> <p>Our Complaints, Compliments and Suggestions Procedure also states the roles of: the complaint lead, the Customer Feedback Specialist, all colleagues and all leaders thereby clarifying their objectives in relation to complaint handling, including the specific objectives of collaboration and collective responsibility.</p>

	engaging with complaints as set by the Chartered Institute of Housing.		
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We complete a self-assessment form annually since this was introduced and the current version is published on our website in the dedicated complaints area.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This is being reviewed now in light of Policy changes coming into effect in January 2024.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	This <u>is</u> communicated as per guidance.

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Section 1 - Definition of a complaint

Mandatory 'must' requirements

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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	Within our Complaints, Compliments and Suggestions Policy, supporting procedure for colleagues and Customer Leaflet.
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	Within our updated complaints policy and procedure this is clear, and this was also reiterated during colleague training delivered in 2023.
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	Within our Complaints, Compliments and Suggestions policy and procedure this is clear, and this was also reiterated during colleague training during 2023.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Within our Complaints, Compliments and Suggestions policy and procedure we clarify our position.
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	Within our policy and procedure, we outline matters not considered complaints, including service requests or services which have their own appeals process. Plus, in these documents and our customer leaflet we provide guidance on Service Requests and Make It Right (which is our fast, informal resolution process).
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	If we are unable to accept a complaint, a written response is provided to the customer with Ombudsman details included in this response.

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	Definitions of Service Requests and Make It Right are provided within our Complaints, Compliments and Suggestions policy and procedure and for customers in our customer leaflet. Our systems are also designed to record the difference between these.
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	During our transactional and perception surveys, conducted by a third party, customers are offered to request contact with 54North Homes to pursue any issues, by requesting a follow up.

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	Our Complaints, Compliments and Suggestions policy and procedure, plus customer leaflet all illustrates all the various channels open to customers to make a complaint. This does include in person, telephone, in writing, social media direct messaging and by email.
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, Compliments and Suggestions policy is available online, or in print on request. We also provide a complaints leaflet to explain the policy in simpler terms, and this is also available in a plain text version. A translation service is also available upon request. Large text or braille can be organised upon request. We have an audio-visual version. All definitions, the stages and how they work, how customers transition between stages and all timeframes are included. We also have a simple infographic for customers to simplify the process and stages.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and	Yes	We have a dedicated section on our website for complaints. This includes our Complaints, Compliments and Suggestions policy,

	process must be easy to find on the website.		customer leaflet, and infographic to explain how it works. This is easily accessible through a search plus we publish a quick link to this page on our letters.
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, Compliments and Suggestions policy and procedure have dedicated sections to Equality and Diversity. To support the individual assessment of a customer's needs, it also presents a non-exhaustive list of reasonable adjustment options which could be considered. Complaint handlers training delivered in 2023 covered our policy.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	We promote our complaint policy, the code and ombudsman through our customer magazine, customer email and website. We also offer a leaflet and infographic.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Ombudsman details are provided in stage 1 and stage 2 response letters, in our customer leaflet and on our website.
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	Our Complaints, Compliments and Suggestions policy and procedure clearly lays this out, as does our complaint leaflet, vand infographic. We also provide Ombudsman details in stage 1 and stage 2 response letters and the customer's right to access the Ombudsman service throughout.

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	Our Complaints, Compliments and Suggestions policy and procedure confirms we accept complaints from social media, using X (previously branded Twitter) Direct Message and Facebook Messenger. Using direct messaging ensures confidentiality and privacy. These are routed into our Customer Experience team who handle as we would any other complaint.

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	We have a Customer Experience Manager and Customer Experience Officer who support named case handlers. Case handlers are assigned according to the nature and stage of the complaint. We provide quarterly reporting into our Customer Experience Committee, which includes board member who are delegated to focus on customer activity. We also provide a quarterly Complaint report to our Board.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our Complaints, Compliments and Suggestions policy and procedure lays out how we ensure there is no conflict of interests e.g., they would not investigate a complaint about themselves or would not hear both a stage 1 and 2. We provide complaint handling skills learning materials through our learning management system to all case handlers.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	We provide complaint handling skills learning materials through our learning management system to all colleagues. We also have defined colleague behaviours specifically regarding how we behave with customers. As our case handlers are within our service areas, they have access to quick resolution and the authority is made clear at each stage of the complaint.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	54North Homes seeks to understand the outcome a customer is looking for and work with them to find a mutually agreeable solution, at both stages of our 2-stage process. During stage 2 our Complaints, Compliments and Suggestions policy and procedure also includes a question seeking the customer's desired outcome and a discussion prior to the investigation, whilst this is not compulsory. Our systems are designed to capture this information and guide colleagues through the timelines. We do not have pre complaint stage, whilst we have a Make it Right - which is our fast, informal resolution process outside of the complaint process. Our policy and procedure is aligned to the Code to provide an acknowledgement within five days of receipt.
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 complaints handling system, has letter templates. The acknowledgement template includes a Complaint summary. If this is unclear, we seek further clarification. At stage 2 we also provide the customer with questions whilst not compulsory, to clarify what they are unhappy with, the reason and what they would like us to do. This is also logged in our complaint system.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our policy and procedure outline how the investigation is impartial, e.g., case handlers would not investigate a complaint about themselves or hear both stage 1 and 2.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Our Complaints, Compliments and Suggestions procedure outlines the various role of colleagues which are involved in complaints. Supporting the best practice outlined here.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency	Yes	We use a customer's preferred method of communication. We also share how we will communicate with them and when asked

	and method of communication		we will adapt. Our policy and procedure outlines examples of how we might adapt to suit customer's needs.
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	Case handlers discuss with a customer the nature of their complaint at stage 1. A conversation is requested with the customer in stage 2 to allow them to share their position in person before the investigation. Where a complaint involves a colleague, interviews are conducted to present their position and offer further information, after which findings are shared.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Within our policy we advise customers they have 12 months to escalate to stage 2, whilst we ask for this sooner so we can act swiftly. We also share this in stage 1 response letter and in our complaint leaflet and video.
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	We ask customers to answer 3 escalation questions before escalating to stage 2, whilst not compulsory. If they do not answer the questions, we would ask again. If this was not available we will conduct this on the information available. If we were to refuse to escalate, we would explain in writing, including guidance on next steps. We also articulate in our policy where we would not accept a complaint such as matter being dealt with through legal action.
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	All complaint information is recorded in one place on our complaint system.
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	We have an Unacceptable Customer Behaviour policy and procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	Colleagues endeavour to manage customer expectations, in particular being clear from the outset if a request for resolution is unreasonable.
4.4	A complaint should be resolved at the earliest possible	Yes	We endeavour to complete a complaint investigation within the

	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.		Ombudsman Code guidelines of 10 working days and 20 working days for stage 1 and stage 2 complaints respectively. They may also need an extension in line with the Code. It may be actions remain after the complaint is responded to and the Lead is expected to oversee this. Where possible the case handler will take actions before all these dates.
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 within our Complaints, Compliments and Suggestions policy and reflected in the customer leaflet and video.
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 this is the case, we make this clear, for instance where we and the customer are obliged to complete Gas safety tests.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Where this is appropriate, we'll name an individual, perhaps in naming who may be visiting the customer. However, we would not name people when it's not relevant or appropriate, such as where a complaint is about this individual.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our policy and procedure support this behaviour. Complaint handlers provide contact details so they may be contacted during the complaint. Handlers also let customers know when they will next update them.
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	In our Tenant Satisfaction Survey and ICS survey, we ask customers about their satisfaction with our complaint service. This information is shared with colleagues and in team meetings we establish actions on these learnings.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	We have formal complaint case learning meetings which establish what we can share as good practice and developmental opportunities. We have wellbeing support available to all colleagues. Complaint learning is shared on our website and our intranet and shared in quarterly and annual reports.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	We completed an Equality Impact Assessment to ensure that in our Unacceptable Customer Behaviour policy, consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

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	Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video we express our aim to respond in 10 working days. We also explain how if we need more time, we will agree this with the customer and share this in writing, this is aligned to the Code's guidance.
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	Within our Complaints, Compliments and Suggestions policy and procedure and all subsequent training, we reiterate the importance of responding to the complaint when the answer is known. On rare occasions, customers insist that complaints are held open and letters are not sent whilst actions remain, here we would have explained the outcome, but the letter would follow in line with their request.
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	Letter templates prompt and provide guidance to ensure all points raised are responded to and the rationale for decision are presented.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them.

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions.
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	Our extension letter template includes the Housing Ombudsman contact details.
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	All complaint details are captured on our complaints system so this can be achieved.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Our Complaints, Compliments and Suggestions policy and procedure explains this.

Mandatory 'must' requirements

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, including transition between stage and exclusions. Our customer leaflet also explains the transitions between stages and their right to approach the Ombudsman.

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	A summary is provided within the acknowledgement letter template. We also ask customers to explain their reason for escalating their complaint using 3 questions, whilst not compulsory. Furthermore, the customer is invited to discuss their complaint with the case handler before the investigation takes place.
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 Complaints, Compliments and Suggestions policy and procedure, stage 1 letter template, plus our customer leaflet and explains this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Our Complaints, Compliments and Suggestions policy and procedure plus our customer leaflet explains this.
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	Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video outline we will respond in 20 working days as noted in the code. We also explain how if we need more time, for good reason, how we will share or agree this with the customer and share this in writing.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them. We do not operate a 3 rd stage.

Best practice 'should' requirements

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions.
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	Our extension letter template includes the Housing Ombudsman contact details.

Mandatory 'must' requirements

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.

Best practice 'should' requirements

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.	Yes	We currently only have two formal complaints stages – stage 1 and stage 2.
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 currently only have two formal complaints stages – stage 1 and stage 2.

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	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which prompts this.
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	Our Complaints, Compliments and Suggestions procedure explains this. Customers are offered compensation where appropriate and our Compensation and Goodwill policy guides colleagues to provide a fair and reasonable remedy.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which

	appropriate. Any remedy proposed must be followed through to completion.		prompts this.
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	Our Compensation and Goodwill policy explains this.

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	Offer of redress and learnings are provided in both upheld and not upheld complaints. Learnings from individual complaints can lead to resolution for other customers, where considered relevant.
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	Our Compensation and Goodwill policy explains this.

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	We publish complaint learnings on our website and intranet. We also share more periodically through our customer magazine and annual report. A quarterly report is provided to our Customer Experience Committee, and our Board. Complaints are discussed monthly at our Executive Leadership team meetings.

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	Yes	Our Customer Experience Committee that includes customers and Board members has responsibility for complaints. This

	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.		Committee has responsibility for ensuring that our Board receives regular and timely information about complaints and complaint handling performance.
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	<p>We provide quarterly reporting into our Customer Experience Committee, which includes board member who are delegated to focus on customer activity. We also provide quarterly complaint handling reports to our Board. This includes:</p> <ul style="list-style-type: none"> • statistical data on complaints as listed • details on all cases heard by the Ombudsman • Ombudsman activity includes Code changes • Complaint learning activity and findings • Audit or risk activity relating to the complaints service • An update on initiatives and progress <p>Furthermore, we established an Ombudsman case KPI which is reported to Leaders monthly and the Board quarterly.</p> <p>The annual self-assessment is shared with our Customer Experience Committee.</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	The quarterly reporting provides theme and trend analysis into our Customer Experience Committee and our Executive Leadership team and our Board for oversight. Our Executive Leadership team has responsibility for policy and performance to act as appropriate, including training.
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 	Yes	<p>Our vision, values and behaviours are well communicated to colleagues and embedded in our culture through communication and leadership. Our behaviours include those specific to how we interact with our customers.</p> <p>Our Complaints, Compliments and Suggestions Procedure also states the roles of: the complaint lead, the Customer Feedback Specialist, all colleagues and all leaders thereby clarifying their objectives in relation to complaint handling, including the specific objectives of collaboration and collective responsibility.</p>

	engaging with complaints as set by the Chartered Institute of Housing.		
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We complete a self-assessment form annually since this was introduced and the current version is published on our website in the dedicated complaints area.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This is being reviewed now in light of Policy changes coming into effect in January 2024.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	This is communicated as per guidance.