

A2dominion Complaint Code Self-Assessment Form 22/23 (April 23)

A previous self-assessment was produced in April 22, covering the period Jan-Dec 21, approved through committee and Board in May 22. <https://a2dominion.co.uk/-/media/Project/A2Dominion-Sites/A2Dominion/PDFs/Help-documents/Complaints-Self-Assessment-2021>

This self-assessment has been completed in April 23 covering the period Jan 22 to Mar 23. Future assessments will follow the financial year cycle, with the next being produced in April 24, covering the period Apr 23 to Mar 24. This self-assessment has been reviewed by our Customer scrutiny panel and approved by the Executive Team and Customer Service Committee in May 23 and Group Board in June 23.

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 set out in our complaints policy and used to train staff on how to log and handle complaints. Landing page with link https://my.a2dominion.co.uk/help/article/KA-02179/en-gb Policy: https://a2dominion.co.uk/-/media/Project/A2Dominion-Sites/A2Dominion/PDFs/Help-documents/A2Dominion-Complaints-Policy.pdf This is also set out in our Complaints procedure and help pages on the Intranet. The Complaints policy and procedure are being refreshed in summer 2023 and new versions will be updated on the website.

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	As 1.2 Complaints submitted via a third party or representative on behalf of the customer are treated in the same way as a complaint raised directly by the customer.
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	As 1.2
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	As 1.2 This defines what the policy does not cover.
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	As 1.2/1.7
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	As 1.2

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	Our teams are trained to action and resolve service requests and to raise and log complaints about services and to clarify this with the resident.

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	Most surveys are carried out by an independent internal team and where live service issues or complaint requests are identified, fed through to our contact team to action appropriately.
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Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	We provide a range of channels to report a complaint including, phone, face to face, email and web forms.
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	This is available on-line (see link in 1.2) and accessible in other formats on request via the phone and by post.
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	This is available through our help facility; How do I make a complaint: https://my.a2dominion.co.uk/help/article/KA-01604/en-gb

			see also policy link in 1.2
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	We provide mandatory training on the Equalities act through our induction programme. We have a Prioritisation (vulnerable) policy which refers to the Equality Act 2010.
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 have complaint information pages on-line, which include information and a link to the Housing ombudsman. The policy also details that customers can access the Ombudsman. Information is shared through ay relevant communications including complaint outcomes. We have dedicated complaint leaflets and will be incorporating the same messaging to our regular magazine to customers; Home.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Contact Information is provided via the website and all appropriate correspondence with residents.
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	Contact Information is provided via the website and all appropriate correspondence with residents. (see 1.2 and 2.6)

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Social media contacts on Group twitter and Facebook are handled via our contact teams who are trained on the complaints policy and procedures.
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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	All complaints are managed through a dedicated complaints team led by the Head of Complaints, reporting in via the Customer Experience Director through to the Executive Director of operations. Performance is reported through monthly KPIs and through the governance framework at quarterly Customer Service Committee. A summary chairs report is provided to Group Board after each committee. This is supported by Complaint champions in respective service delivery areas.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All team members are trained in line with the complaint policy and related procedures any conflicts of interest are addressed on joining the team and annually thereafter.

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 	Yes	Training and support is provided to all case workers to be able to act sensitively and fairly and to deal with distressed and upset residents. The team have access to Complaint champions in service areas to resolve complaints and means of escalation

	<ul style="list-style-type: none"> • 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. 		<p>though senior case workers, the complaints team manager and Head of service, and respective colleagues across other teams. The team have the authority and autonomy to escalate matters to resolve disputes quickly and fairly, supported by weekly trigger meetings and at stage two, case conferences.</p>
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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.</p> <p>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.</p> <p>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>We do not operate any additional stages. Where we are unable to resolve a concern or service issue to the customers satisfaction, a complaint will be raised.</p> <p>Residents are able to ask for the matter to be treated as a complaint at any time.</p> <p>In accordance with 4.1 of the Complaints code, Complaints at stage one are acknowledged and logged within 5 days. We aim to do this within 2 days.</p>
4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is</p>	Yes	<p>Our case workers are trained to do this and it is performed at the time of logging the complaint and any clarifications agreed with the resident.</p>

	seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.		
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	This is part of our case worker complaint handling training. See also 3.3
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	This is part of our case worker complaint handling training. See also 3.3
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is part of our complaint handling training and case workers will adhere to reasonable means of communication with the resident. This is also monitored through complaint satisfaction surveys.
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 workers are trained to consider all evidence carefully and provide fair opportunity for customers to present their case to enable a decision to be reached. The two stage process also provides opportunity to challenge any stage one decision. See also 4.2
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The Policy includes the timeframe for dealing with a complaint and that the complainant can escalate this at any time to the Ombudsman.

			The policy is being updated to include 20 days for escalation* from a stage one complaint.
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 detailed in the complaints policy (see link in 1.2).
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 information is held on a A2dominion Microsoft Dynamics CRM 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	This is contained in the unacceptable actions policy, linked to the complaints policy.

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	This is included in the case worker training and in the template responses.
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	Yes	We aim to handle complaints within the timeframes set out in the code. Quicker resolution is targeted through the use of complaint champions in respective service delivery areas. Weekly trigger meetings are in place to address or escalate any delays.

	resident and whether there are any urgent actions required.		
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	Complaints raised through an approved* representative will be treated in the same way, including accompaniment to any meeting or panel. *approved by the customer to act on their behalf.
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	This is included in the case worker training and our legal team support the Complaints team with legal opinion where appropriate.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Caseworkers and colleagues are trained not to blame individuals. We apologise where we have fallen short and take ownership and collaborative action to put things right.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Caseworkers are trained to, and will agree with complainants when they will next be in touch or a suitable level of updates.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	We conduct randomised complaint surveys after a complaint has been resolved and collect feedback related to complaints in our anniversary survey programme. This is reported back through the Customer Service Committee quarterly and along with complaints themes used to drive improvements.
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	Complaint champions within all service areas complete a lessons learnt for individual complaints. Complaint insight is used to inform our top 10 hurts and drive service improvement including areas such as first-time fix on repairs, keeping customers better informed and addressing contractor performance issues.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should	Yes	This is contained in the unacceptable actions policy (as 4.18)

	demonstrate regard for the provisions of the Equality Act 2010.		
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Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	No	<p>This is the standard set within the business which we measure performance against.</p> <p>Performance is published in monthly KPIs. A corporate plan is in place which includes a complaints improvement plan to continue to increase the % that are responded to within timescale and any agreed extension (73% over the period reported, rising to over 90% in April 23 at the time of completing the self-assessment).</p> <p>Results are also discussed at regular Operations meetings and quarterly customer service committee.</p>
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	<p>Where the actions cannot be completed within the timescale of the response, a promise date is given.</p> <p>Response date actions are currently monitored manually and are part of the improvement plan to drive greater assurance these are being met or improvement where they are not.</p>
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>This is included in the response template and training provided.</p> <p>We have introduced resident scrutiny to review letters/responses and the first review conducted scored response quality between 85-98%. Increased and regular scrutiny is part of our Improved resident involvement policy from this year.</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>These are included in the template response and training provided. We have introduced resident scrutiny to review letters/responses and the first review conducted scored response quality between 85-98%. Increased and regular scrutiny is part of our Improved resident involvement policy from this year.</p>
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	<p>Most complaints are resolved at stage one of our process. The way to escalate to a stage two complaint is made clear in the stage one outcome letter template. In the few instances where we do not escalate due to an exclusion ground this is confirmed in writing.</p>
5.10	<p>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.</p>	Yes	<p>This is carried out to ensure the reasons for escalation are properly captured, recorded and responded to.</p>

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	This process is trained and followed and is included in the policy (see 1.2 link). Stage two complaints can only be created after a closed stage one complaint and as a result of being requested by the customer.
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 two are predominantly responded to by a Head of Service or Director and never the same respondent as stage one.
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.	No	<p>This is the standard set within the business and performance shared in regular reports.</p> <p>A corporate plan is in place which includes a complaints improvement plan to continue to increase the % that are responded to within timescale and any agreed extension (85% in March 23).</p> <p>Results are also discussed at regular Operations meetings and quarterly customer service committee.</p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>These are included in the template response and training provided. We have introduced resident scrutiny to review letters/responses and the first review conducted scored response quality between 85-98%. Increased and regular scrutiny is part of our Improved resident involvement policy from this year.</p> <p>As there is no stage three, details of how to escalate to the Housing Ombudsman are provided.</p>

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.	N/A	We operate a two-stage process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	We operate a two-stage process.

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	Yes	We aim to respond to all stage one complaints within 10 working days and where we are unable to do this the caseworker will make contact with the resident to agree any reported

	the complaint fully, this should be agreed by both parties.		extensions. Where this is not agreed performance is shown as non-compliant.
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	We inform customers that they can escalate to the Ombudsman at any stage in the process, including where they may be unhappy with the time we are taking to provide a response or resolution, or where they do not agree with an extension.
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	The customers history will be considered in addressing the issues raised and the appropriate actions and response
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 incorporated in the case worker training and procedure so that additional relevant information is included and considered within the response. Where this emerges later a new complaint will be raised.

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	Most complaints are resolved at stage one of our complaints process. We aim to respond to all stage two complaints within 20 working days and where we are unable to do this the caseworker will make contact with the resident to agree any reported extensions. Where this is not agreed performance is shown as non-compliant.

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	The complainant is informed that they can escalate the complaint to the ombudsman at any part of the process, including where they may be unhappy with the time we are taking to provide a response or resolution, or where they do not agree with an extension.
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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	We operate a two-stage process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We operate a two-stage process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	This is included in case worker training and response templates setting out how we should investigate and resolve complaints, sharing this with the customer with a summary of any promise dates and where appropriate associated learnings.
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 included in case worker training and enables case workers to question policy if it has caused detriment. This is supported by our Compensation policy and all compensation payments are reviewed and approved through the Head of Complaints & Resolution.
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	Where the actions required to resolve a complaint cannot be completed within the response timeframe, details will be provided with a promise date for any proposed actions. This is detailed within our response templates. Response date actions are currently monitored manually and are part of the improvement plan to drive greater assurance these are being met or improvement where they are not.
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	This is laid out in the compensation policy and used to determine any appropriate levels of redress.

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	Yes	We have a number of ways of addressing this, including individual lessons learnt capture and case reviews, by looking for themes in complaints.

	right' in terms of process or systems to the benefit of all residents.		Our top 10 hurts are compiled using customer feedback and complaint themes and scrutinised by customers to align with improvement programmes, that benefit the wider customer experience. A corporate plan is in place to drive improvement across a number of areas including the end-to-end repairs process and improved management of contractor duties, as well as looking to improve levels of communication with customers during service delivery.
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	Where appropriate, resolution will be agreed by the Complaints and Resolution team in conjunction with the legal team.

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 have introduced Top 10 hurts, based on key drivers of dissatisfaction and complaints. These have been reviewed and validated with a large cohort of engaged customers. This is reported through committee cycles including the customer service committee. Key themes of dissatisfaction are identified and referenced to local improvement initiatives and the wider corporate plan improvements. Themes are also used in the design of our service standards and customer commitments which we are refreshing in 2023. This will also be reported through our Customer Annual Report, for wider customer awareness.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Compliance with the Complaint code is within of the Terms of reference for the Customer Service Committee. This is chaired by an independent Board Member and supported by the Executive Director of Operations, who also attends Group Board.
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>Key complaint information is captured through monthly KPI reporting to the Executive team. Complaint performance is reported quarterly through the Customer Service committee. A summary Chairs report is provided to Group Board.</p> <p>This is supported by a more detailed half yearly report through the customer service committee to share themes and progress. Any severe maladministration findings are shared immediately with committee and Group board along with case review findings, lessons learnt and action tracking.</p> <p>We are strengthening this area with the introduction of new complaint reasons (Apr 23) and a new automated dashboard (Apr 23), to increase visibility and access to complaints volumes and drivers. The Corporate Plan has been introduced to monitor and track progress in areas requiring improvement, including the Complaints improvement plan.</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 Corporate Plan has been introduced to monitor and track progress in areas requiring improvement, including the Complaints improvement plan.

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. 	No	<p>Complaint compliance is a Group KPI. We have a shared objective across our Customer facing and operational teams to support the effective handling of complaints.</p> <p>We do not currently have a standard objective in relation to complaint handling for all employees. We feel this is covered in our Values and Behaviours for Success, which are embedded in our performance management framework for all colleagues. Customer commitments are currently being reviewed and refreshed with a number of engaged residents for launch in 2023.</p>
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This is our third year of reporting, covering 2022 and Jan-Mar23, with two previous reports covering 2020 and 2021. Future reports will be aligned with the full financial year, with the next report produced in April 24 for approval and publication by the end of May 24.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This would be carried out in line with any significant changes to structure or approach.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members 	Yes	The self-assessment is reported through our Executive team, Customer Service Committee and Group Board. All self-assessments are published on our website (see link in the header of this document for the previous assessment). This assessment will also be published through our annual report.

	<ul style="list-style-type: none">• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents• include the self-assessment in their annual report section on complaints handling performance		
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