

## Appendix 3: Self-assessment action plan to be built into the Complaints Improvement Plan

### Action plan for non-compliant elements

Ref	Requirement	Commentary	Actions	Timescales	Lead
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	<p>The Unacceptable Actions by Complainants Policy is out of date and it has been recognised that it does not go far enough to detail how the policy complies with the Code requirements. An initial review has concluded that this policy should be updated in line with the wider Cautionary Alerts, and that this will need to happen in consultation with resident representatives.</p> <p>Whilst we do keep any restrictions under review on a local basis (i.e. the colleague who placed the restrictions would keep a note themselves to review the restrictions) we are working on embedding this functionality within our complaints CRM for a central overview and improved ability to evidence decisions made under the policy in line with Code requirements.</p>	Work to update the Unacceptable Action by Complainants Policy and the Cautionary Alerts Policy will commence in June 2024 and expect completion, including customer engagement.	End Q3 2024/25	Assistant Director Operational Performance
			An interim procedure for centrally recording decisions taken under the Unacceptable Actions by Complainants Policy to be implemented.	End July 2024	Director of Homes & Communities
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	<p>Whilst we do keep any restrictions under review on a local basis (i.e. the colleague who placed the restrictions would keep a note themselves to review the restrictions) we are working on embedding this functionality within our complaints CRM for a central overview and improved ability to evidence decisions made under the policy in line with Code requirements.</p>	As part of the new policy and procedure, a more formal process for recording decisions taken under the policy to be introduced.	End Q3 2024/25	Assistant Director Operational Performance
			Once the new policy and procedure is live, update the self-assessment to confirm compliance to the Code.	End Q3 2024/25	Assistant Director Operational Performance
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	<p>We have self-assessed as being compliant in policy but not non-compliant in practice. For cases marked as resolved in the FY 2023/24, only 49% of Stage 1 and 71% of</p>	Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in	End September 2024	Assistant Director Operational Performance

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	<p>Stage 2 complaints were responded to in compliance with timescales for both acknowledgement and response. This performance highlights operational challenges which result in non-compliance with the Code requirements.</p> <p>A Complaints Improvement Plan is established and is starting to make progress – for instance showing that cases marked as resolved between 1 April and 20 May 2024, compliance was 77% (Stage 1) and 75% (Stage 2). The progress against the plan is being monitored by CSC and Board.</p>	order to achieve compliance.		
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.				
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.				
6.6 & 6.17	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	<p>Our performance of tracking outstanding actions to resolution needs to improve. Reports are provided to business areas (functions) to monitor 'promise dates' to resolution. Non-compliance of promise dates is reported to Director and Executive level for appropriate resolution.</p> <p>This is a key area of focus for us in 24/25 to improve. The reports we have now provide full visibility of the progress of actions. We will be using this data to drive performance improvements. We anticipate significant improvement in our compliance by September 2024.</p>	Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve significant improvement in compliance.	End Q2 2023/24	Assistant Director Operational Performance

## Action plan for compliant elements

Ref	Requirement	Commentary	Actions	Timescales	Lead
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Whilst we have a compliant policy, we do not currently collect data on complaints raised by third party representatives.	Complete system changes.	End Q2 2024/25.	Assistant Director Operational Performance
3.6	Landlords must 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.				
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	We will seek further assurance by including links to our complaints procedures on surveys hosted through Power Plus.	Complete system changes.	End Q2 2024/25.	Assistant Director Operational Performance
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	We do not currently record when we refuse to accept a complaint, and our reasoning for doing so. We want to be able to check that we are acting reasonably and have confidence that our policy is not unfairly disadvantaging groups of residents.	Complete system changes.	End Q2 2024/25.	Assistant Director Operational Performance
2.2	A complaints policy must set out the circumstances in which a matter will not				

	<p>be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> </ul> <p>Matters that have previously been considered under the complaints policy.</p>				
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>				
2.4	<p>If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>				
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they</p>				

	must consider the individual circumstances of each complaint.				
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Whilst we have a range of options of how customers can make a complaint, we want to gain further assurance that customers have access to material promoting our complaints process non-digitally (leaflets, posters, etc.)	Agree range of non-digital promotional material for circulation.	End Q2 2024/25	Assistant Director Operational Performance
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Linked to 3.1 & 3.7, we already have a range of ways in which we tell customers about the Ombudsman. We want to gain further assurance that customers have access to material promoting the Ombudsman and the Code non-digitally (leaflets, posters, etc.)	Agree range of non-digital promotional material for circulation.	End Q2 2024/25	Assistant Director Operational Performance
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	<p>We provide this information in a range of ways, but the website was found to contain some out-dated information, and needs updating.</p> <p>Additionally, linked to 3.1 &amp; 3.5, we already have a range of ways in which we tell customers about the Ombudsman, further assurance could be provided that non-digital customers have access to material promoting our complaints process (leaflets, posters, etc.).</p>	<p>Complete review of webpage.</p> <p>Agree range of non-digital promotional material for circulation.</p>	<p>End June 2024</p> <p>End Q2 2024/25</p>	<p>Assistant Director Operational Performance</p> <p>Assistant Director Operational Performance</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Whilst we have a compliant policy, and are aware that this is happening in practice, we do not currently record agreed extensions of timescales within our CRM in a way that is reasonably	Complete system changes.	End Q2 2024/25.	Assistant Director Operational Performance

6.4 & 6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 (Stage 1) /20 working days (Stage 2) without good reason, and the reason(s) must be clearly explained to the resident.	easy to access aside from a manual intervention. We therefore additionally cannot confirm that we are providing good reasons, nor that we are providing the contact details of the Ombudsman. This will form part of service improvement actions for system change request to start to collect this data in an alternative way. Once this happens, we plan to start to monitor extensions to identify further service improvements.			
6.5 & 6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.				
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Resident / household vulnerabilities are recorded separately in our systems. System improvements will bring vulnerability data into the same system. In the meantime, CRS workers are trained to check recorded vulnerabilities.	Complete system changes.	End Q3 2024/25.	Assistant Director Operational Performance