TOWER HAMLETS HOMES REVIEW OF THE HOUSING OMBUDSMAN CODE – Self-Assessment Form – SEPTEMBER 2022

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually. Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** |
| **1.2** | A complaint must be defined as:  ‘*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*. |  | THH has adopted the Housing Ombudsman complaint definition. |
| **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. |  | We do accept complaints via a third party or representative – This is outlined in our complaint’s procedure |
| **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. |  | If we are unable to resolve an issue at the first point of contact, then we do log as a formal complaint |
| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. |  | Exclusions are clearly defined in our Complaints Procedure. |

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| **1.8** | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. |  | Exclusions are consistent with policies of other social landlords. We have also consulted with the THH Residents’ Panel. |
| **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. |  | If a complaint is not accepted, then a letter is automatically generated from our complaints system providing an explanation  We will also be incorporating the following paragraph in all our rejection letters.  ‘If you are dissatisfied with this decision, you may wish to take your complaint to the Housing Ombudsman Service: [https://www.housing-ombudsman.org.uk/residents/make-a-complaint/#](https://www.housing-ombudsman.org.uk/residents/make-a-complaint/)  or Telephone: 0300 111 3000’ |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** |
| **1.4** | Landlords should recognise the difference between a |  | We deal with service requests as a Query. |
| **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. |
| **1.5** | Survey feedback may not necessarily need to be |  | Service areas follow up on all negative feedback from surveys to resolve customer issues. Service areas are encouraged to take control of complaints and will escalate to log a formal complaint when needed |
| 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. |

Section 2 - Accessibility and awareness Mandatory ‘must’ requirements

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| **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. |  | We offer different channels to make a complaint:   * Via an e-form on our website * In writing * By phone 02073645015 |
| **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. |  | We provide a detailed and summary version of our complaint’s procedure on our website, together with a flow chart and video. We also provide a link to the documents in the complaint acknowledgement |
| **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. |  | The information is accessible on our website.  We are improving our website so that it is easier to make a service request such as raising a complaint and to find the associated policy and procedures. |
| **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. |  | THH is committed to ensuring that none of our residents are disadvantaged in accessing our services. We have introduced a Reasonable Adjustments policy which will be published on our website  All staff responsible for complaints will need to complete the E Learning on Dispute Resolution and will be required to undertake refresher training on equality, diversity, and inclusion |
| **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. |  | Our complaints policy and procedure, and self-assessment of the code are available on our website. We also provide a link to a complaint’s summary in our complaint acknowledgement and to the detailed policy document |
| **2.7** | Landlords must provide residents with contact  information for the Ombudsman as part of its regular correspondence with residents. |  | This is provided in the summary documentation and in the complaint response.  <https://www.towerhamletshomes.org.uk/about-us/feedback/overview> |
| **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. |  | This is provided in the summary and responses. |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **2.2** | Where a landlord has set up channels to communicate |  | This is provided in the policy.  We advise residents that we will take up their concerns offline and raise a formal complaint when needed |
| 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. |

Section 3 - Complaint handling personnel Mandatory ‘must’ requirements

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| **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”. |  | The Customer Relations Team carries out audits to ensure the service areas take ownership and responsibility for complaints  Performance and learning from complaints are reported to the Standards Committee and Board and our Residents’ Panel. |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of  interest. |  | Regular meetings are held with the service areas regarding complaint handling. Additional training will be provided in the Autumn.  **Annual half day session as a refresher extending to contractors**  **All staff and contractors responsible for dispute resolution/complaints to complete the Housing Ombudsman E Learning**  The Customer Relations Team also cascades best practice information obtained through forums facilitated by the National Federation of ALMOs and TPAS. |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** |
| **3.3** | Complaint handlers should: |  | We promote the Housing Ombudsman’s principles of dispute resolution. Peer checks are undertaken by the Customer Relations Team to make sure responses are empathetic and easy to understand. We are an open organisation and encourage staff to take appropriate action to facilitate the quick resolution of a complaint. Staff are encouraged to make recommendations i.e., offer of compensation or other remedial actions to resolve a dispute quickly.  All Stage 1 complaints are signed off by the Head of Service for the service area |
| * 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. |

Section 4 - Complaint handling principles Mandatory ‘must’ requirements

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| **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**. |  | We maintain a clear audit trail within our complaints system iCasework. We have clear escalation protocols to ensure that there are not any delays.  We acknowledge stage one complaints within 2 working days of receiving them.  We have a stage 2 escalation protocol which acts on the request for an escalation but also flags to the service area to work with the resident to get any outstanding issues resolved |
| **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. |  | A generic acknowledgement is sent setting out that the case investigator will contact the complainant within 2 working days.  It is at this phone call stage, that the case owner sets out their understanding of the complaint and the outcome the resident is seeking. This is then confirmed within the Stage 1 response. |
| **4.6** | A complaint investigation must be conducted in an impartial manner. |  | The Customer Relations Team carry out spot checks as part of the monthly audits to ensure impartially |
| **4.7** | The complaint handler must:   * 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. |  | All responses are quality checked by the Head of Service to ensure that all information and evidence is used to decide upon the outcome in an impartial way.  Services such as repairs do rely on essential input and feedback from contractors during the investigation process. However, the final review stage is always undertaken by a member of THH middle management before the complaint is signed off by the Head of Service. We also monitor escalations to Stage 2 for any concerns around impartiality in the handling of complaints. |
| **4.11** | Landlords must adhere to any reasonable  arrangements agreed with residents in terms of frequency and method of communication |  | We monitor any agreements or remedial actions agreed with residents through our complaints management system. This allows us to monitor progress against timelines |
| **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:   * set out their position * comment on any adverse findings before a final decision is made. |  | As part of the investigation the case investigator will engage with the individual (staff or resident) that may be the subject of the complaint to ensure they have an appropriate opportunity to set out their position.  Before drafting the response, the complaint handler would be expected to notify the affected individuals of any adverse findings and the reasons for this finding if appropriate. |
| **4.13** | A landlord must include in its complaints policy its  timescales for a resident to request escalation of a complaint |  | We have revised our policy to set a 20 working day,although every case will be treated on its merits |
| **4.14** | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints |  | In accordance with our Stage 2 escalation protocols, we escalate a case whenever a resident asks for an escalation. It is the Council’s Corporate Complaint team who determines whether a request is refused. Cases are typically refused where it relates to an insurance claim which is managed through a separate process. |

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|  | 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. |  |  |
| **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. |  | This is evidence within iCasework – our complaints management 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. |  | We have a persistent users and vexatious policy |

Best practice ‘should’ requirements

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| **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 |  | As part of our call-backs to residents, staff are expected to have conversations on what outcomes may be realistic. Training on conflict management will be rolled out in the coming months to provide staff training and support on having difficult conversations. |
| **4.4** | A complaint should be resolved at the earliest possible |  | We require all complainants to be called back within 2 working days of their complaint being logged. We also encourage staff to resolve complaints at this stage if possible. We have mechanisms to monitor performance on this area and will be monitoring more closely. |
| 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. |
| **4.5** | Landlords should give residents the opportunity to have |  | This is covered in our Complaints policy and procedure |
| 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. |
| **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. |  | Prompts for staff are included in the Stage 1 response template to ensure this is addressed where required. |
| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. |  | Included a prompt in the Stage 1 response |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. |  | Generally, this is done, using corrective actions and To Do’s in our complaint system. Timescales are provided in the acknowledgement |
| **4.16** | Landlords should seek feedback from residents in |  | An external organisation carries out a complaint survey after the response is sent. Additionally, we have re-introduced a 5 day feedback emails/calls after response is sent to make sure the complaint is resolved. |
| relation to the landlord’s complaint handling as part of |
| the drive to encourage a positive complaint and |
| learning culture. |
| **4.17** | Landlords should recognise the impact that being |  | We share the quarterly complaints report with staff and hold 6 weekly meetings with the service areas to look at the learning from complaints.  We also hold specific learning circles when we receive a detrimental determination from the Housing Ombudsman |
| 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 |
| **4.19** | Any restrictions placed on a resident’s contact due to |  | Persistent and Vexatious Service User Guide |
| unacceptable behaviour should be appropriate to their |
| needs and should demonstrate regard for the |
| provisions of the Equality Act 2010. |

Section 5 - Complaint stages Mandatory ‘must’ requirements Stage 1

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.1** | Landlords must respond to the complaint **within 10 working days** 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. |  | THH are responsible for Stage 1 complaints and is required to operate in in accordance with London Borough of Tower Hamlets policy which sets a 20-day response target. We have an internal target to respond within 10 working days in line with the Housing Ombudsman’s Code – Performance 97% 2021/2022 |
| **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. |  | We respond to complaints in line with our 10-working day target and set out our commitments which are tracked using iCasework. |

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| **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. |  | Prompts are made available in the Stage 1 response template to ensure staff address all points and make appropriate reference to policy and law where applicable. |
| **5.8** | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:   * 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 |  | This information is provided in all our responses which are subsequently reviewed and signed off by a Head of Service |

Stage 2

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| **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 |  | We escalate in accordance with our Stage 2 escalation protocols to the Council to review  In instances where the escalation is declined by the Council, there is a letter within the complaint system which is generated to state the reasons for not escalating |
| 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. |
| **5.10** | On receipt of the escalation request, landlords must set out their |  | We are working with the Council who review Stage 2 escalation requests to meet this best practice requirement. |
| 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. |
| **5.11** | Landlords must only escalate a complaint to stage two once it |  | This requirement is complied with |
| has completed stage one and at the request of the resident. |

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| **5.12** | The person considering the complaint at stage two, must not be |  | THH responds at Stage 1, whilst the Council responds at Stage 2. This prevents the possibility of the escalation being considered by the same person. |
| the same person that considered the complaint at stage one. |
| **5.13** | Landlords must respond to the stage two complaint **within 20** |  | In the event of a Stage 2 not being sent within timeframe, holding response is sent to resident with new timescale as a matter of courtesy |
| **working days** 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. |
| **5.16** | Landlords must confirm the following in writing to the resident at |  | The Council undertakes this function and meets this requirement |
| the completion of stage two in clear, plain language: |
| * 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** |
| * 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. |

Stage 3

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| **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 have a 2-stage process |

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| **5.20** | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:   * 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 have a 2-stage process |

Best practice ‘should’ requirements Stage 1

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| **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 |  | Requests for extensions and correspondence from residents is documented in our complaint system |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.3** | Where agreement over an extension period cannot be reached, |  | 97% of all our Stage 1 responses are completed within timescale. Where additional time is required due to the complexity of a case, we will seek an extension. If this is not agreed, the complainant will be referred to the Ombudsman. Our policies will reflect this requirement. This is currently not an issue for THH. |
| 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. |
| **5.4** | Where the problem is a recurring issue, the landlord should |  | We check for previous members enquiries and complaints in iCasework which is our complaints and enquiries management system. |
| consider any older reports as part of the background to the |
| complaint if this will help to resolve the issue for the resident. |
| **5.7** | Where residents raise additional complaints during the |  | We do aim to address additional points that may be raised by a resident in subsequent conversations with us prior to issuing a Stage 1 response. Where matters raised are entirely unrelated to the original complaint, we will log a new complaint |
| 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. |

Stage 2

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| **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 |  | The Council undertakes its investigation at Stage 2 within 20 working days in line with its complaints policy. The number of instances where an extension is sought is low and typically do not exceed 10 working days. |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.15** | Where agreement over an extension period cannot be reached, |  | We will work with the Council to embed this best practice requirement. |
| 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 |

Stage 3

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| **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 | N/A | This is not applicable to Tower Hamlets Homes as we operate a 2 stage process. |
| 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. |
| **5.19** | Where agreement over an extension period cannot be reached, | N/A |
| 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. |

Section 6 - Putting things right Mandatory ‘must’ requirements

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| **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. |  | Our complaints management system allows us to maintain an affective audit trail of communication and track corrective actions agreed with residents through the complaints process. |
| **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. |  | Our current policy covers this. We are in the process revising our redress policy which will help us better acknowledge and respond to issues of service failures whilst taking into account individual circumstances. |
| **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. |  | We have a new procedure for tracking remedies that have been offered and these are tracked via our complaints system |
| **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. |  | This is covered in our existing policy and proposed new Redress Policy |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.3** | Landlords should look beyond the circumstances of the |  | We are in the process of reviewing our redress policy and this will consider how we can better manage events such as communal heating outages and other such similar events. |
| individual complaint and consider whether anything needs to be |
| ‘put right’ in terms of process or systems to the benefit of all |
| residents. |
| **6.7** | In some cases, a resident may have a legal entitlement to |  | We have sought legal advice where needed |
| redress. The landlord should still offer a resolution where |
| possible, obtaining legal advice as to how any offer of resolution |
| should be worded. |

Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **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. |  | This is looked at and reported to SMT/Staff/Standards Committee/Resident Scrutiny Committee  We will produce a summary of our Lessons Learnt in the Annual Report |

**Best practice ‘should’ requirements**

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| **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 |  | This will be the whole of the THH Board |
| 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. |
| **7.4** | As a minimum, governing bodies should receive: |  | Reported to SMT/EMT/Standards Committee  CRM tracks all ombudsman determination to ensure they are complied with  The annual self-assessment will be signed off by our Standards Committee and Board |
| * 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. |

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| **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. |  | This is reported internally within our governance structures and acted upon |
| **7.6** | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:   * 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. |  | There is an objective set around complaint handling for all employees |

Section 8 - Self-assessment and compliance Mandatory ‘must’ requirements

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| **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. |  | THH has complied with this requirement since the introduction of this requirement. |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. |  | A further self-assessment will be undertaken in the event of the ALMO going back in house to the Council. Decision likely to be made Spring 2023 |
| **8.3** | Following each self-assessment, a landlord must:   * 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 |  | This self-assessment has been reported to THH Board and also the Council to share with elected members  Once signed off by Board and the Council this will be uploaded onto our website, replacing the existing one.  A summary of the annual report will be provided in the annual report |