

# Housing Ombudsman Complaint Handling Code: Self-assessment form



Must have requirements

Should have requirements

Compliance with the Complaint Handling Code		Yes	No	Additional information
<b>1</b>	<b>Definition of a complaint</b>			
1.2	<p><b>Does the complaints process use the following definition of a complaint?</b>  <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></p>	✓		<i>The definition is referenced in our Complaints Policy Section 2.0 Scope</i>
1.3	<p><b>Does the customer have to use the word complaints for it to be treated as such?</b>                      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 should still be handled in line with the landlord's complaints policy.</p>	✓		<i>Colleagues are trained to recognise service failures and acknowledge complaints even if not formally expressed. Complaints can also be submitted by third parties and/or representatives.</i>
1.4	<p><b>Do we recognise the difference between service requests and complaints?</b>                      A service request is a request from a resident to their landlord requiring action to be taken to put something right. Service requests should be recorded, monitored and reviewed regularly</p>	✓		<i>Early resolution is Accents equivalent to a service request. It is an informal stage, where the issue is rectified promptly and without the need to escalate onto formal complaint stages. We log early resolution (service requests) through our complaints system to allow for reporting, but we accept they are not a formal complaint. This stage is not reported on to our Benchmarking partners. We have acted early to avoid a complaint and early resolution was deemed the appropriate use of language. Work might be needed to solidify this language and the use of this stage in line with HOS code. Regular performance analysis is needed to ensure formal complaints are not incorrectly recorded at this stage. Our complaints policy will need reviewing in line with this definition. This is highlighted in section 2.0 Scope in our Complaints Policy.</i>
1.5	<p><b>Do we treat survey feedback as a complaint?</b>                      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.</p>		✓	<i>Customers who provide low scoring satisfaction scores via our transaction surveys are contacted to resolve any issues, including providing the option to escalate through the complaints process where appropriate. On surveys with anonymised contact information we are unable to provide any follow up activity. Where possible we would try and contact customers that have reported dissatisfaction through surveys, but this is not in 100% of cases. Aim to have this embedded by Q4 due to potential changes in survey provider.</i>

1.6*	<p><b>Are we correctly raising a formal complaint when a service request has failed to be resolved?</b> Chasers on a service request, such as a missed appointment, can often be resolved 'there and then' with an apology and the provision of another appointment and may not need to enter the complaints system. However, if further enquiries are needed to resolve the matter, or if the resident requests it, the issue should be logged as a complaint.</p> <p>*No details available on Code of conduct table (Must/Should unknown)</p>	✓		<p><i>Accent identified repairs complaints in particular were being raised where a complaint wasn't needed. New training implemented in September where the agreed process will be for Accent colleagues to raise a complaint if the customer requests or if the customer experiences the same service failure 3 or more times. An ongoing review will be completed to align the remainder of the complaints being raised with the same process if necessary.</i></p>
1.7	<p><b>Does the policy have exclusions where a complaint will not be considered?</b> A landlord must accept a complaint unless there is a valid reason not to do so.</p>	✓		<p><i>We set out any reasons why we may not accept a complaint in Paragraphs 2.0 Scope, Section 4.0 How to make a complaint and 9.0 Appendices – Appendix 1 – Exclusions to this policy</i></p>
1.8	<p><b>Are these exclusions reasonable and fair to residents? Evidence relied upon</b> 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.</p>	✓		<p><i>Accent's National Scrutiny Group have reviewed the exclusions and deem these fair to residents. We set out any reasons why we may not accept a complaint in Paragraphs 2.0 Scope, Section 4.0 How to make a complaint and 9.0 Appendices – Appendix 1 – Exclusions to this policy.</i></p>
1.9	<p><b>Do we provide a detailed explanation if we do not accept a customers complaint?</b> If a landlord decides not to accept a complaint, a detailed explanation should 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.</p>	✓		<p><i>There is potentially an over-reliance on verbal communication of these messages, a more detailed review of this activity is needed to assess full compliance with this. It has been noted as best practice and will be reviewed. The right to escalate to the Ombudsman features in every letter sent out to customers following their complaint.</i></p>
<b>2</b>	<b>Accessibility</b>			
2.1	<p><b>Are multiple accessibility routes available for customers to make a complaint?</b> 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.</p>	✓		<p><i>Complaints can be made via our website, by telephone, in person, online and in writing.</i></p>
2.2	<p><b>Do we provide details of how complaints made via social media will be dealt with?</b> 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.</p>		✓	<p><i>The complaints policy does not explicitly reference the route that complaints via social media are dealt with. It has been noted as best practice and will be reviewed.</i></p>
2.3	<p><b>Is out complaints policy available in a clear and accessible format?</b> 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.</p>	✓		<p><i>Our complaints policy is accessible on our website and can be provided to customers in paper form if required. This details the stages and timescales involved.</i></p>
2.4	<p><b>Is the complaints policy and procedure available online?</b> 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.</p>	✓		<p><i>Please see 2.3 above.</i></p>

<p>2.5 <b>Do we have a reasonable adjustments policy?</b></p> <p>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.</p>	✓	<p>Not formally named reasonable adjustments policy. Accent offer their publications in multiple languages, formats and font sizes upon request.</p>
<p>2.6 <b>Do we regularly advise customers about our complaints process?</b></p> <p>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.</p>	✓	<p>As a result of this assessment Accent has improved how we are publicising our complaints policy and the HOS code outside of our online channels. We will regularly keep our website up to date &amp; make the complaints process as easily accessible to our customers as possible.</p>
<p>2.7 <b>Do we provide residents with contact information for the HOS as part of regular correspondence?</b></p> <p>Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.</p>	✓	<p>This has always been an expectation however, we have formalised the template for a formal response to ensure we comply.</p>
<p>2.8 <b>Do we provide early advice to customers about the HOS?</b></p> <p>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.</p>	✓	<p>This is as an expected behaviour, however internal analysis would be required to determine the robustness of this within our regular contact. This is stated in all correspondence to customers who have raised a complaint and is also stated in our Complaints Policy Section 8.0 External Review.</p>
<p><b>3 Complaints handling personnel</b></p>		
<p>3.1 <b>Is there a complaint officer/team or equivalent in post?</b></p> <p>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".</p>	✓	<p>All our customer-facing colleagues are responsible for handling complaints and resolving complaints to the customer's satisfaction. We have recently recruited a Complaints Performance Manager (June 2022) who will be reviewing our approach to complaints ownership and overall oversight.</p>
<p>3.2 <b>Does the complaint officer have autonomy to resolve complaints?</b></p> <p>the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.</p>	✓	<p>Customer-facing colleagues are fully trained and empowered to resolve customer complaints.</p>
<p>3.3 <b>Does the complaint officer/handlers have adequate experience/training and authority to compel engagement from other departments to resolve disputes?</b></p> <p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	✓	<p>All colleagues are encouraged to collaborate to ensure the best resolution for the customer. Continuous training needs are assessed and delivered in-house.</p>
<p><b>4 Complaint handling principles</b></p>		

4.1	<p><b>Are all complaints acknowledged and logged within five days?</b></p> <p>The Ombudsman does not consider it appropriate for complaints to be handled 'informally', at 'stage 0', 'pre-complaint stage' or in any other way that keeps the complaint outside of the complaints process, even for a short time. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	✓		<i>This is in line with our policy, both Manager Investigation (Stage 1) and Director Investigation</i>
4.2	<p><b>Are we providing a clear complaint acknowledgement?</b></p> <p>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.</p>	✓		<i>This is in line with our policy expectations.</i>
4.3	<p><b>Are we managing customer expectations?</b></p> <p>Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic</p>	✓		
4.4	<p><b>Are we resolving complaints at the earliest opportunity?</b></p> <p>A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.</p>	✓		
4.5	<p><b>Are we giving the customer the opportunity to have a representative deal with their complaint?</b></p> <p>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.</p>	✓		<i>Internal analysis would be required to determine how well this is communicated and understood, something that we will review as part of this assessment.</i>
4.6	<p><b>Are we investigation complaints in an impartial manner?</b></p> <p>A complaint investigation must be conducted in an impartial manner, seeking sufficient, reliable information from both parties so that fair and appropriate findings and recommendations can be made.</p>	✓		
4.7	<p><b>Are our complaint handlers responding and acting in the correct way?</b></p> <p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> </ul> <p>keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</p>	✓		
4.8	<p><b>Are we clearly setting out legal obligations?</b></p> <p>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.</p>	✓		<i>Where a resident expresses their concern regarding Accent not meeting their legal obligations, colleagues will consult our Legal Team prior to issuing a response. We will update our internal guidance to ensure this process is clear.</i>

4.9	<b>Are we maintaining anonymity where appropriate?</b> Communication with the resident should not generally identify individual members of staff or contractors.	✓	<i>This would require a case review to assess robustness, something we will review in line with this assessment.</i>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	✓	<i>This in a regular area of performance analysis</i>
4.11	<b>Are we accommodating reasonable adjustments in communication?</b> Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	✓	<i>This is in line with the expectations set in our complaints training</i>
4.12	<b>Are we giving all subjects a fair chance to represent their position?</b> 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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	✓	<i>This is in line with the expectations set in our complaints training</i>
4.13	<b>Are we providing details of escalation process within Complaints policy?</b> A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	✓	
4.14	<b>Are we unreasonably refusing to escalate complaints?</b> 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.	✓	<i>We do not expect any staff member to refuse escalation without a reasonable explanation. This is set out in our Complaints Policy in sections 5,6 &amp; 7.</i>
4.15	<b>Are we keeping adequate records of complaints?</b> 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.	✓	<i>We use a complaints management system to electronically record, store and report on complaints.</i>
4.16	<b>Are we seeking customer feedback on our complaints service?</b> 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	✓	<i>A complaint closure survey is sent to the customer asking for their feedback.</i>
4.17	<b>Are we learning from complaints and engaging colleagues?</b> 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	✓	<i>A monthly learning lab takes place to discuss cases and address any performance concerns. The membership, scope and outcome of this lab are currently under review.</i>
4.18	<b>Do we have policies and procedures in place to manage unacceptable behaviour?</b>	✓	<i>Accent has a warning messages guide</i>

	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.			
4.19	<p><b>Are we taking appropriate action in relation to unacceptable behaviour in line with the Equality Act 2010?</b></p> <p>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</p>	✓		<i>We would always expect colleagues to act with the appropriate needs of customers in mind. This isn't easily reportable but could be assessed on a case by case basis through regular auditing. Noted as best practice.</i>
<b>5</b>	<b>Complaint stages</b>			
	<b>Stage 1</b>			
5.1	<p><b>Are we responding to complaints within HOS timescales?</b></p> <p>Landlords must respond to the complaint <b>within 10 working days</b> 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.</p>	✓		<i>Accents definition of response: Acknowledged complaint and replied to customer with appropriate response. Accents target is currently within 5 days, which is a higher threshold than expected by HOS.</i>
5.2	<p><b>Are we seeking agreement where an extension is needed beyond 10 days?</b></p> <p>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.</p>	✓		<i>Any extensions are expected to be agreed with customer</i>
5.3	<p><b>Are we following the correct procedure for overcoming extension disputes?</b></p> <p>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.</p> <p>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.</p>	✓		<i>Housing Ombudsman's contact details are set out at all stages of our complaints process. Contact details for the Ombudsman are detailed in Section 8.0 External review.</i>
5.4	<p><b>Are we considering previous reports when handling reoccurring complaints?</b></p> <p>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.</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
5.5	<p><b>Are we closing the complaint at the correct time?</b></p> <p>A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>		✓	<i>After a recent evaluation of our complaints process, we have established that current practices do not mirror the HOS code, we will be addressing this by updating our complaints closure process and retraining of colleagues. Immediate changes have been communicated to all colleagues, end of Q3 colleagues are expected to be completing this process.</i>
5.6	<p><b>Are we providing a thorough response to customers?</b></p> <p>Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
5.7	<p><b>Are we raising new additional complaints correctly?</b></p> <p>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</p>	✓		<i>As a whole complaints are being raised correctly. However, it has been identified there are occasions particularly related to repairs complaints have been logged when we didn't need to. This has been</i>

	stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.			<i>addressed in the new complaints training for the technical hub.</i>
5.8	<p><b>Are we confirming the correct information to customers in writing at Stage 1 completion ?</b></p> <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"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	✓		<i>This is in line with the expectations set in our complaints training</i>
<b>Stage 2</b>				
5.9	<p><b>Are we correctly escalating to Stage 2?</b></p> <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>	✓		<i>This is a regular area of performance monitoring</i>
5.10	<p><b>Are we providing customers with the correct information following an escalation request?</b></p> <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>	✓		<i>This is in line with the expectations set in our complaints training</i>
5.11	<p><b>Are we escalating in line with a customers request?</b></p> <p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
5.12	<p><b>Are we ensuring the complaint is dealt with by appropriate people?</b></p> <p>The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.</p>	✓		
5.13	<p><b>Are we responding to Stage 2 complaints within HOS timescales?</b></p> <p>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.</p>	✓		<i>Accents target is currently within 5 days, which is a higher threshold than expected by HOS.</i>
5.14	<p><b>Are we seeking agreement where an extension is needed beyond 20 days?</b></p> <p>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.</p>	✓		<i>See 5.2</i>
5.15	<p><b>Are we following the correct procedure for overcoming extension disputes?</b></p> <p>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</p>	✓		<i>See 5.3</i>

<p><b>5.16 Are we confirming the correct information to customers in writing at Stage 2 completion?</b></p> <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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> </ul> <p>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</p>	✓		See 5.8
<b>Stage 3</b>			
<p><b>5.17 Do we have more than 2 stages?</b></p> <p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.</p>		✓	
<p><b>5.18 If we had a third stage, would we know what was expected?</b></p> <p>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 <b>within 20 working days</b> 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.</p>	n/a	n/a	We do not have a Stage 3
<p><b>5.19 Are we following the correct procedure for overcoming extension disputes?</b></p> <p>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.</p>	n/a	n/a	We do not have a Stage 3
<p><b>5.20 Are we confirming the correct information to customers in writing at Stage 3 completion?</b></p> <p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> </ul>	n/a	n/a	We do not have a Stage 3



	<ul style="list-style-type: none"> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul> <p>details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</p>			
<b>6</b>	<b>Putting things right</b>			
6.1	<p><b>Do we have a clear complaints resolution process?</b> 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.</p>	✓		
6.2	<p><b>Are we managing customers expectations?</b> 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.</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
6.3	<p><b>Are we considering wider improvements as part of complaints learning?</b> 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.</p>	✓		<i>Discussed at a monthly learning lab. The membership, scope and outcome of this lab is currently under review.</i>
6.4*	<p><b>Are we considering the right things when considering resolution response?</b> Factors to consider in formulating a remedy can include, but are not limited to, the:</p> <ul style="list-style-type: none"> <li>length of time that a situation has been ongoing</li> <li>frequency with which something has occurred</li> <li>severity of any service failure or omission</li> <li>number of different failures</li> <li>cumulative impact on the resident</li> <li>resident's particular circumstances or vulnerabilities.</li> </ul> <p>*No details available on Code of conduct table (Must/Should unknown)</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
6.5	<p><b>Are we clearly describing what will happen and by when?</b> 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.</p>	✓		<i>This is in line with the expectations set in our complaints training</i>
6.6	<p><b>Do we have an adequate compensation policy that meets the HOS?</b> 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.</p>	✓		<i>The compensation policy adheres to the guidance in place for statutory payments.</i>
6.7	<p><b>Are we responding appropriately even when a customer is pursuing legal action?</b> 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.</p>	✓		<i>When a resident is pursuing legal action colleagues will consult with our legal team to ensure we are responding appropriately.</i>
<b>7</b>	<b>Continuous learning and improvement</b>			

7.1*	<p><b>Do we have a positive complaint handling culture?</b></p> <p>A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes, the quality of the service provided, the ability to learn and improve, and the relationship with their residents. The Ombudsman encourages landlords to use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.</p> <p>*No details available on Code of conduct table (Must/Should unknown)</p>	✓		<p><i>Accent has introduced a Complaints Performance Manager role to enhance controls around complaints performance and improve the overall learnings from complaints to ensure we are preventing service failures.</i></p>
7.2	<p><b>Are we reporting on wider learning of complaints?</b></p> <p>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.</p>	✓		<p><i>Discussed at a monthly learning lab. The membership, scope and outcome of this lab is currently under review. A new website page is being developed to provide customers with the opportunity to scrutinise performance more regularly. This will include regular complaints performance figures and updates on how we have responded to and/or prevented service failures.</i></p>
7.3	<p><b>Do we have a lead governing body for complaints?</b></p> <p>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.</p>	✓		<p><i>Helen Jagger – Chair of Customer Experience Committee has been appointed into this lead role. The CEC are provided with complaints performance reports on a quarterly basis.</i></p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> </ul> <p>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.</p>	✓		<p><i>The governing body does receive regular reports on complaints as well as the annual performance report. We are working to establish the role for more individual complaint outcomes and will do this through the use of our Learning Lab as this will provide reviews of any issues and trends as this could be improved.</i></p>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	✓		<p><i>Discussed at a monthly learning lab. The membership, scope and outcome of this lab is currently under review. More work is needed to raise the profile of complaints with senior leaders.</i></p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> </ul> <p>act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing</p>	✓		<p><i>This is in line with the expectations set in our complaints training</i></p>
8	<p><b>Self-assessment and compliance</b></p>			

8.1	<p><b>Are we carrying out an annual assessment against the code?</b> Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.</p>	✓		<i>We will aim to carry this out in Autumn each year between August - October</i>
8.2	<p><b>Are we carrying out an assessment following significant change?</b> Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.</p>	✓		<i>Currently a change in customer contact arrangements at the same time of the self assessment so has been carried out.</i>
8.3	<p><b>Are we making the self-assessment available to all the right people and places?</b> Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	✓		

