

## Sensible Housing Co-operative Ltd - Complaint Handling Code Annual Submission

Appendix A: Self-assessment form



**Section 1: Definition of a complaint** 

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Y	Complaint policy section 1.2	
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.	Υ	Complaint policy section 1.3	Our Committee Members and third-party Service Provider are aware of the requirement to refer these to the Complaints Officer for follow up.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Υ	Complaint policy sections 1.5 & 1.6	All service requests relating to property repairs and maintenance are recorded on our housing management system by our service provider.  Service requests relating to any other service are recorded in our Complaints database as a separate category. These are reviewed and monitored by the Complaints Officer. These are reported back to the Committee regularly, usually monthly depending on the issue.



1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Υ	Complaint policy section 1.7	Any expression of dissatisfaction is referred to the Complaints Officer who will attempt to contact the member by phone to understand the issue and resolve at that stage. If contact can't be made a letter is sent outlining what we know of the issue, asking the member to contact us and advising of the Complaints policy and process.  These are logged in our Complaints database.  Any ongoing work to address the service request is unaffected.
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.	Y	Complaint policy section 1.8	We monitor all repairs satisfaction surveys as they come in and any that contain negative feedback are followed up by phone so that we can understand what went wrong and how we can put it right.  The survey also advises our tenant members that they can submit a complaint, and directs them to the policy on our website.



### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Υ	Complaint policy section 2.1	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:  • The issue giving rise to the complaint occurred over twelve months ago.  • 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.  • Matters that have previously been considered under the complaints policy.	Y	Complaint policy section 2.2	



2.3	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.	Υ	Complaint Policy section 2.3	
2.4	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.	Υ	Complaint Policy section 2.4	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Υ	Complaint Policy section 2.1	



**Section 3: Accessibility and Awareness** 

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	Υ	Complaint policy sections 1.4, 4.1 & 4.2	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Y	Complaint policy sections 1.4 & 5	We do not employ staff and the number of people to whom a resident could potentially raise a complaint is limited. All have been trained in Customer Care.  The majority of day-to-day contact with our tenant members will be with our service provider. We have shared our Complaints Policy and this self-assessment with them. They have been briefed on our complaints process and will refer any expressions of dissatisfaction to the Complaints Officer for follow up.  Occasionally an expression of dissatisfaction will be made to one of our committee members, who have all been briefed to refer to the Complaints Officer for follow up.



3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Y	Complaint policy section 4.3	We recognise that low volumes of complaints are potentially a sign that residents are unable to complain, and we take steps to mitigate for that.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Y	Complaint policy section 4.4	Our Complaints Policy is primarily published on our website each year along with information about the Ombudsman and this Code. We share a copy with our tenant members via our closed Facebook Group.  We include a copy in our Members Handbook and this is emailed to new members when they sign up for a property.  We offer a hard copy on request, and we will consider requests for alternative formats where needed.  Throughout the year we will remind people of the policy and process through our Facebook group and through our member newsletter as appropriate.  We publish details of Complaints received and our performance on complaints in our Annual Report which is presented to tenant members at our Annual General Meeting.



3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	Complaint policy section 4.4	As above
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.	Y	Complaint policy section 4.5	
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.	Y	Complaint policy sections 7.2, 8.5, 8.7 & Section 13	



Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Y	Complaint policy Sections 5 & 6	We have appointed our Chair as our Complaints Officer as they have the necessary skills and knowledge to ensure complaints are handled fairly and in line with the HO Code. They are also familiar with all our policies and procedures and are the main point of contact with our service provider.  We have appointed our Secretary as Appeals Officer and they will be supported where needed by our service provider.  Our service provider does not have a major role in our complaints process but they do have a social housing background and are familiar with the HO Code. They are able to provide support and expertise if needed.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Y		The Co-operative does not employ staff. Instead we contract with a third party to provide rent collection and repairs delivery plus some housing management functions. The Complaints Officer is the main point of contact with our service provider.  The Complaints Officer is also our Chair which gives them the authority and autonomy to resolve disputes promptly and fairly.



4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Y	Complaint policy section 5.4	Complaints Officer has undertaken dispute resolution training. Complaints Officer and service provider are trained in customer care.
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# **Section 5: The Complaint Handling Process**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Υ	One complaint policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Υ	Complaint policy section 7 & 8	Only two complaint stages
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Υ	As above	As above



5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Υ	The complaint policy section 7.4	Complaints are not ordinarily handled by a third party at any stage.  The only time a third party would be involved in managing complaints is if all the committee members are conflicted out. In this unlikely event the co-op's service provider would be asked to handle the complaint at the relevant stage. This would form part of the two stage complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	As above	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Υ	Complaint policy sections 7.1 & 8.3	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Υ	Complaint policy sections 7.1 & 8.3	



5.8	At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and  d. consider all relevant information and evidence carefully.	Y	Complaint policy section 6	
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.	Υ	Complaint policy section 7.2 & 8.5	
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.	Y	Complaint policy sections 4.1 & 4.2	Records of any disabilities, reasonable adjustments and vulnerabilities are recorded at tenancy sign up and are reviewed regularly as part of customer contacts, including service requests and complaints. These are held on our housing management database.  The co-operative has written to all tenant members requesting that they confirm or update their details and this will be repeated every year.  We have adopted a Vulnerabilities and Reasonable Adjustments Policy.



5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Y	Complaints policy section 2	
5.12	A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.	Y		We use a complaints database to record information at every stage of a complaint. This provides a clear audit trail and is used to inform learning.  We use SharePoint as our content management system for all correspondence and relevant supporting documentation relating to an individual complaint.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Y	Compensation Policy	We have a Compensation Policy which complies with the HOS guidance on remedies.
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.	Y	Complaint Policy section 3	We have an Unacceptable Behaviour Policy in place. Each case would be reviewed and any restrictions amended as required.



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.	Y	As above	
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## **Section 6: Complaints Stages**

# Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation.  Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Y		Our complaints to date have all been resolved at stage 1.
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.	Υ	Complaint policy Section 7.1	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Υ	Complaint policy Section 7.2	



6.4	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 working days without good reason, and the reason(s) must be clearly explained to the resident.	Υ	Complaint policy Section 7.2	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Υ	Complaint policy Section 7.2	
6.6	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.	Υ	Complaint policy Section 7.3	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Υ	Complaint policy Section 7.8	



6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Y	Complaint policy Section 7.7	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Y	Complaint policy Section 7.8	



Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Υ	Complaint policy Section 8.1	
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.	Υ	Complaint policy Section 8.3	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Υ	Complaint policy Section 8.2	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Υ	Complaint policy section 8.1	Complaint Officer stage 1 Appeals Officer stage 2
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Y	Complaint policy 8.4	



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 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Y	Complaint policy section 8.5	
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.	Υ	Complaint policy section 8.5	
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.	Y	Complaint policy section 8.6	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Υ	Complaint policy section 8.7	





## **Section 7: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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. These can include:  • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Y	Complaints policy Section 9.1	Where service failure is found this will be acknowledged and information provided to the resident.  We review every complaint and consider if/how we could have better met the residents expectations. This may be through service improvements or policy changes, or conversely by better communicating what residents can expect.  We would also consider if improvements were needed to our policy and practice even if service failure wasn't found, for example if our repairs policy or standard was found to deliver below what our tenant members would expect.  An example of this would be where we changed the way we procure boiler replacements in order to shorten timescales for residents experiencing total loss of heating and hot water.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Complaint policy section 9.2	Co-operative compensation policy uses the Housing Ombudsman remedies and guidance procedure when assessing remedial action and/or compensation.



7.3	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.	Y	Complaint policy section 9.3	The response would include a clear timeline and provide information on our next steps to resolve the complaint through to completion
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Υ	Complaint policy section 9.4	Any remedies would be in line with the Housing Ombudsman remedies and guidance procedure.



**Section 8: Self-assessment, reporting and compliance** 

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and  f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Y	Annual complaint's performance and service improvement report providing all the information requested	The self – assessment against the code is produced annually by the Complaints Officer with the Appeals Officer providing a scrutiny function. This is then shared with the Management Committee, our service provider and our tenant members.



8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Y	The governing body/ board of trustee's statement must be in response to the Annual complaint's performance and service improvement report 2023/2024 Publish on the Co-Operative website	The annual report will be reported to our Management Committee and published on our website.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	N/A		No such changes have taken place. We acknowledge that we understand the requirement of this provision.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A		No such request has been made. We acknowledge that we understand the requirement of this provision.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	N/A		Not applicable. We acknowledge that we understand the requirement of this provision.



Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Y	Annual complaint's performance and service improvement report	We review every complaint and consider if/how we could have better met the residents expectations. This may be through service improvements or policy changes, or conversely by better communicating what residents can expect.  We would also consider if improvements were needed to our policy and practice even if service failure wasn't found, for example if our repairs policy or standard was found to deliver below what our tenant members would expect.  Our Management Committee and our service provider review the Annual complaint's performance and service improvement report.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Y	Annual complaint's performance and service improvement report	We use feedback from complaints alongside survey feedback to identify areas where our <b>service delivery</b> is in need of improvement. We would raise this with our service provider and agree how improvements can be made.  We use feedback from complaints alongside survey feedback to identify areas where our <b>service standards</b> are no longer meeting the expectations of our tenant members.



9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Y	Annual complaint's performance and service improvement report	Our policies and service standards are set by our tenant members so ultimately they get to decide if/when they need to be changed.  Our Annual complaint's performance and service improvement report is reviewed by our Management Committee alongside feedback from our repairs satisfaction surveys and our TSMs. Any trends would be identified and we would either make the required improvements or invite our tenant members to a discussion to further explore issues and solutions.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Υ	Complaint Policy Section 10.1	This is our Chair who also acts as our Complaints Officer and leads on investigating Stage 1 complaints.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Υ	Complaint Policy section 10.2	Our Complaints Officer and Chair is also our Member Responsible for Complaints.  Given the size of our organisation, the low number of complaints and our objective of keeping complaints handling in-house, it works best for us to have this as a combined role.



9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Υ	The MRC necessarily attends all our Management Meetings and is the main point of contact between the Co-op and our service provider. The MRC has full access to all our systems and files so is able to investigate fully any issues.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and  d. annual complaints performance and service improvement report.	Y	Due to the low number of complaints the MRC would ordinarily report each time we receive a complaint and outline the nature of the complaint. Progress would be reported to each subsequent committee meeting until the complaint is resolved.  This is in addition to end of year reporting and analysis.  We acknowledge the requirements of this provision and would adjust our reporting accordingly should the number of complaints increase.



9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Y	We collaborate with our service provider with the shared aim of providing good quality services to our tenant members that are in line with service expectations.  We proactively review any areas where service delivery falls short of expectations and identify ways to improve.  Our shared intention is to resolve complaints at Stage 1 and in doing so we will acknowledge any shortfalls in service delivery.
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