

Housing Ombudsman Complaint Handling Code: Self-assessment form

V1.0 - 31/12/2020

Compliance with the Complaint Handling Code ("The Code")			
1	Definition of a complaint	Yes	No
	<p>Does the complaints process use the following definition of a complaint?</p> <p><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> <p>This is the definition recommended in the Code by the Housing Ombudsman for all social housing landlords to use. This is so that there is a consistency for all residents.</p> <p>We have taken the requirements of the new Code as an opportunity to review and clarify our formal Complaints policy and will also incorporate the new definition. Our Complaints process overview document will also include the Ombudsman's latest definition. This shorter and more customer-focussed document reflects our policy and process for complaint management and is posted or e-mailed to all residents when escalated to stage 1 for ease of understanding our process and options for contacting the Ombudsman service.</p> <p>Other revisions to our policy bring it in line with the Code as well as taking account of feedback from our residents. Changes around accepting a complaint, escalating complaints and managing unreasonable behaviour have all been added or re-worded to ensure clarity for residents and staff and to improve the chance of early resolution.</p> <p>We put these changes out to large-scale resident consultation to gauge clarity and have made changes as a result of this feedback. Following Board approval, we will have the new policy in place by early 2021.</p>		No

<p>Does the policy have exclusions where a complaint will not be considered?</p> <p>The Code requires us to be clear about any circumstances where we will not accept a complaint. These must be fair and reasonable.</p> <p><i>Our Examples are: -</i></p> <ul style="list-style-type: none"> • <i>An initial request for a service</i> • <i>Reports of neighbour nuisance or anti-social behaviour (these are dealt with by separate departments)</i> • <i>Complaints about services that are not provided by THA</i> • <i>A complaint which relates to an event more than 6 months before the date that we receive the complaint (exceptions considered where safeguarding or Health & Safety is a factor)</i> • <i>Any issue which is subject to pending or ongoing legal proceedings or investigation.</i> • <i>A complaint that has already been completed under this policy.</i> <p>In addition, we have added that: - <i>"We may not deal with correspondence or other forms of communication at any stage that is abusive to staff or contains allegations that lack substantive evidence. We reserve the right in these circumstances to contact the resident, or advocate, to explain that the complaint may be suspended or refused escalation".</i></p> <p>These exceptions have been expanded to take account of the discretions allowed within the Code and we have also stated our approach if we decide not to accept a complaint. This will ensure we communicate fully with our residents and provide a full explanation so that they can understand our position and their next steps.</p>	<p>Yes</p>	
<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon</p> <p>Extensive consultation has been used to inform changes to the policy – and this assessment. Feedback included a point made about exclusions: -</p> <p><i>"Not to disagree with its legitimacy or to undermine in any way the associations right and duty to protect itself and staff but to suggest a slight softening of its tone if you are wanting to show this new inclusive, based around the tenant/complainants needs. Might I suggest you perhaps lose the word 'inform' and replace it with 'explain'"?</i></p> <p>As a result, for example, we have changed wording in our policy from 'inform' to 'explain', that we 'may not' rather than 'will not' and that we will explain our reasons.</p>	<p>Yes</p>	

2	Accessibility		
	<p>Are multiple accessibility routes available for residents to make a complaint?</p> <p>There are many ways in which you can contact us - by phone (0300), in person, by letter, website (on-line form), e-mail (enquiries@), social media posts, Rant & Rave (our text-based feedback service). The website also provides several additional access features such as 'Browsealoud' and larger text.</p> <p>Anonymous complaints will be considered on their merit, but responses may be limited.</p>	Yes	
	Is the complaints policy and procedure available online?	Yes	
	<p>Do we have a reasonable adjustments policy?</p> <p>Whilst Together Housing Association (THA) does not currently have a stand-alone policy, we have an Equality & Diversity policy that states: -</p> <p>6.1 We are committed to ensuring that:</p> <ul style="list-style-type: none"> • There is equality of opportunity in terms of access to Together Housing's services by ensuring that particular needs of customers are recognised and accommodated, both in terms of the strategic development of our services and embedded into everyday delivery of services; • All staff and customers' needs are understood, and all services are tailored, where reasonably practical, to best fit customers' needs and requirements, including in relation to the protected characteristics; <p>We will provide staff with additional guidance in relation to reasonable adjustments in the form of Frequently Asked Questions/case studies.</p> <p>We have also added consideration of reasonable adjustments in the updated complaints policy: -</p> <p>Treating People Fairly –</p> <ul style="list-style-type: none"> • Being flexible in our application of policies and procedures to ensure we take account of individual needs and agree what reasonable adjustments can be made. <p>Together Housing provides assurance across two policy documents that we will consider our resident's needs and make reasonable adjustments where this is possible.</p>		No
	<p>Do we regularly advise residents about our complaints process?</p> <p>We provide regular updates to resident groups and annually on our website. We also publish complaint performance and data as part of our six-monthly transparency commitment. We publish these on our website, in e-mailed newsletters and in print where we know residents prefer this.</p>	Yes	

3	Complaints team and process		
	<p>Is there a complaint officer or equivalent in post? THA has a dedicated Resolution Team (RT) that formed in 2019. This was in part born out of a resident conference and other feedback where this showed a desire that a “<i>dedicated point of contact</i>” would be helpful.</p> <p>There are two complaint co-ordinators working full-time on monitoring and managing the complaint process and support all staff with advice and guidance. They manage all formal escalations, MP contacts and Ombudsman enquiries and cases.</p>	Yes	
	<p>Does the complaint officer have autonomy to resolve complaints? Incorporated in Job Descriptions and supported by managers.</p> <p><i>Essential duties - “Support and provide advice to service managers and staff across THA on identifying effective solutions to resolve complaints and ensure that complainants receive an appropriate customer focussed response”.</i></p> <p>The Resolution Team are independent and work with their colleagues to consider appropriate redress options and may also discuss this with the resident to ensure it is fair, appropriate and resolves the situation for both parties.</p>	Yes	
	<p>Does the complaint officer have authority to compel engagement from other departments to resolve disputes? The Resolution Team have developed constructive and effective relationships with all service areas and work with them to achieve positive outcomes with our residents. Their independence also ensures any disputes are considered fairly and that they reflect the needs of both sides in the resolution journey.</p> <p>This approach is incorporated in Job Descriptions and supported by managers.</p> <p><i>Job purpose – “Co-ordinate complaint and resolution management across Together Housing Association, to ensure the delivery of a high quality, customer-focussed service”.</i></p>	Yes	
	<p>If there is a third stage to the complaint procedure are residents involved in the decision making? We do not have a formal third stage. Our initial ‘Get It Sorted’ (GIS) phase is informal but is used to rectify and record failure or dissatisfaction with service delivery. If a resident sets out where this has not been achieved, we will escalate to a more formal stage 1 investigation by a manager alongside our Resolution Team. Stage 2 reviews are carried out by senior managers.</p>		N/a
	<p>Is any third stage optional for residents? No, our stage 2 review by a senior manager completes our formal process and residents are informed of their right to contact the Ombudsman and we provide their contact details.</p>		N/a

	<p>Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service? We have a standard paragraph in our stage 2 (final) letter template. This right to contact the Ombudsman is also set out in documentation on our website and leaflets.</p> <p><i>"We have now exhausted our complaint process. However, if you feel more could have been done, you can refer your complaint to a local MP or Councillor. They may then contact us or refer your complaint to the Housing Ombudsman. Alternatively, following an 8-week period you can contact the Housing Ombudsman directly at:</i></p> <p><i>Housing Ombudsman Service PO Box 152 Liverpool, L33 7WQ".</i></p>	Yes	
	<p>Do we keep a record of complaint correspondence including correspondence from the resident? We make notes of any conversations and copies of e-mails are transferred to our Housing Management System. Longer notes and letters between us are also added to a document retention system that is available to all staff.</p>	Yes	
	<p>At what stage are most complaints resolved? We are pleased report that most dissatisfaction and complaints are resolved at the first point of contact, our informal "Get It Sorted" (GIS) stage. In the first six months of 2020/21 (April-September) 98.7% were resolved at this point. (<i>Out of 925 GIS, just 12 were escalated to stage 1</i>).</p>	98.7%	
4	Communication		
	<p>Are residents kept informed and updated during the complaints process? Acknowledgements are sent as part of the formal stages, but we also confirm actions, report progress and next steps at our informal GIS stage too, through e-mails and phone calls. These contacts are also recorded as notes on our housing management system so that all staff are aware and can inform and update the resident if necessary.</p>	Yes	
	<p>Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision? Yes. The published policy and process states any GIS (Get It Sorted) can be escalated to a Manager for a Stage 1 investigation and that this in turn can be reviewed by a senior manager (Stage 2).</p> <p>We also ensure that they are given a chance to respond and challenge any area of dispute. <i>"The resident can set out their position, what outcome they are seeking and request that this is investigated/reviewed..."</i>). The option for these escalations is also included in the correspondence and the following is in our stage 1 (formal) responses: -</p>	Yes	

	<p>"We trust this explains the situation but if you don't feel THA has addressed your concerns, please tell us why. If we do not hear from you within 10 working days (xx/xx/xxxx) we will assume the issues have been resolved".</p>		
	<p>Are all complaints acknowledged and logged within five days? All calls to the Contact centre are immediately assessed and prioritised (triaged) and logged on our system. The resident is informed where the complaint is being sent and that they will be contacted. Complaints by e-mail or through the website or other means get an immediate acknowledgement and informed they will be contacted within five days.</p>	Yes	
	<p>Are residents advised of how to escalate at the end of each stage? We make sure our process is available on our website, but this is also posted out as a hard copy when escalating at stage 1. We have a standard paragraph on the letter templates and in any GIS correspondence: -</p> <p>"We trust this explains the situation but if you don't feel THA has addressed your concerns, please tell us why. If we do not hear from you within 10 working days (xx/xx/xxxx) we will assume the issues have been resolved".</p> <p>However, if we don't feel that escalation is appropriate, we will always fully explain this to our residents and inform them of their option to contact the Ombudsman. Our policy states: - <i>"We look to manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.</i></p> <p><i>This means that if there is nothing further that can be done, we will explain why escalation to stage 1 will serve no purpose and that the complaints process has been exhausted. We will provide contact details of the Ombudsman at this point. This decision will be agreed by the Resolution Team".</i></p>	Yes	
	<p>What proportion of complaints are resolved at stage one? Using the last 6-months data – 33% have been resolved at this stage. In the first six months there were 12 stage 1 and 8 stage 2 complaints (no. s1 raised (12) against no. s2 escalated (8))</p>	33%	
	<p>What proportion of complaints are resolved at stage two? Using the last 6-months data – 87.5% have been resolved at this stage. In the first six months there were 8 stage 2 complaints and one went to the Ombudsman (no. s2 against THO cases)</p>	87.5%	
	<p>What proportion of complaint responses are sent within Code timescales?</p> <p>Six months (April-Sept 2020)</p> <ul style="list-style-type: none"> • Stage one Stage one (with extension) • Stage two Stage two (with extension) 	<p>GIS</p> <p>S1 Ext.</p> <p>S2 Ext.</p>	<p>85%</p> <p>82.2%¹ 7.8%</p> <p>67% 33%</p>

	<p>Multi-service complaint complexity mean extensions are likely, but these are always in agreement with the resident.</p> <p>We are reviewing our case management process to help us improve how we identify and report on timescales required by the Code.</p>		
	<p>Where timescales have been extended, did we have good reason? We will always explain any reasons for extension and the agreements we have discussed with residents are recorded in our housing management system and on their file.</p>	Yes	
	<p>Where timescales have been extended, did we keep the resident informed? We will always try and avoid extending our timescales for resolving complaints. We will therefore contact the resident to explain the reasons and give an indication of what they can expect. These conversations are recorded and can be evidenced in our housing/case management and document retention system. For GIS, this can be both written or verbal, for stage 1 & stage 2, we maintain written evidence on file.</p> <p>We are reviewing our case management process to help us improve how we identify and report on timescales required by the Code.</p>	Yes	
	<p>What proportion of complaints do we resolve to residents' satisfaction? Although this is not currently independently checked or recorded, we are going to establish sample telephone checks through the resident engagement team on all complaint stages.</p> <p>We are moving this to a pilot and will have some results early in the New Year.</p>		No data
5	Co-operation with Housing Ombudsman Service		
	<p>Were all requests for evidence responded to within 15 days? Having a Resolution Team means we are in a good position to provide information in good time. The only case we have had this year (to date) was managed within this timescale. For any future cases, evidence will be available for scrutiny as this is recorded in in our housing management system.</p>	Yes	
	<p>Where the timescale was extended, did we keep the Ombudsman informed?</p>	N/a	
6	Fairness in complaint handling		
	<p>Are residents able to complain via a representative throughout? The option for using an advocate has always been included in our published policy and in on-line documentation.</p> <p>"THA will accept complaints from authorised advocates acting on behalf of another person, where that person has a right to complain".</p>	Yes	

	<p>If advice was given, was this accurate and easy to understand? We quality check conversations our contact centre staff have with our residents daily. This is done by regular side by side assessments with senior advisors and will identify and learn from any issues raised.</p> <p>Information of advice given is also recorded and monitored as part of the regular data analysis of complaints.</p>	Yes	
	<p>How many cases did we refuse to escalate? There have been just two so far in 2020/21 (April-September)</p> <p>What was the reason for the refusal? Persistent abusive language and behaviour Refusal to accept explanations in responses</p>	2	
	<p>Did we explain our decision to the resident? We will always explain our reasons for not escalating a complaint and all information provided and correspondence sent are available in our housing management and document retention systems.</p> <p>This is also explicit in our policy: -</p> <p><i>"We look to manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.</i></p> <p><i>"This means that if there is nothing further that can be done, we will explain why escalation to stage 1 will serve no purpose and that the complaints process has been exhausted. We will provide contact details of the Ombudsman at this point. This decision will be agreed by the Resolution Team".</i></p>	Yes	
7	Outcomes and remedies		
	<p>Where something has gone wrong, are we taking appropriate steps to put things right? We have a specific 'compensation' policy on our website and a procedure that sets out our approach to redress. We also have specific expense codes in our financial system so that we can monitor and report on payments made under this policy.</p> <p>Any actions taken such as apologies, changing processes, arranging further work, training for staff and financial recognition are also evidenced in our responses to the resident.</p>	Yes	
8	Continuous learning and improvement		
	<p>What improvements have we made as a result of learning from complaints? Any specific changes made are logged and used to capture what the issue was and how we have, or plan to, address the issue. Information on such learning is shared with residents, staff and senior managers. Some examples are: -</p> <ul style="list-style-type: none"> • New Anti-social Behaviour (ASB) triage system – easier to manage 		

	<ul style="list-style-type: none"> • Repairs pledge has been introduced • Reminders to staff about improving communication around appointments • Gas letters have been made easier to understand • Initiated a review of pest control • Improved quality checking framework for Contact centre staff (listening and assessing calls). 		
	<p>How do we share these lessons with: -</p> <p>a) residents? Transparency reports every six months on our website and in e-magazine. Annual Report also contains complaint data and learning. Information presented to Local Panel (resident) groups across the regions.</p> <p>b) the board/governing body? Information report annually and six-monthly reports to Operations Committee.</p> <p>c) In the Annual Report? Yes – this is available on our website and other formats.</p>		
	<p>Has the Code made a difference to how we respond to complaints? We have tightened up our reporting practices and are regularly reviewing compliance with the Code. We are also adding satisfaction and resident participation to our processes as a result.</p>	<p>Yes</p>	
	<p>What changes have we made?</p> <ul style="list-style-type: none"> • Updated the complaints policy following extensive consultation – including new definition • Ensuring ‘Reasonable Adjustments’ are referred to in our Equality & Diversity and Complaints policies and improving guidance to staff. • Starting to monitor satisfaction with the process • Improving our communication with residents 		