

Appendix B – Self-Assessment Form

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

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <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>	Yes	Point 3.2 of Hightown's complaints policy states: <i>A complaint is 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".</i>
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.	Yes	Point 3.2.1 of Hightown's complaints policy states: <i>The customer does not have to use the word "complaint" in order for their expression of dissatisfaction to be treated as such under this policy.</i> Point 3.6 of the policy details third parties and representatives entitled to make a complaint.

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.	Yes	Exclusions are set out in Point 3.9 of Hightown's complaints policy
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.	Yes	Point 3.9.1 of Hightown's complaints policy states: <i>Where a matter is not eligible to be considered under this policy, a detailed explanation will be provided setting out the reasons why the matter is not suitable for the complaints process.</i>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a 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.	Yes	Point 3.9 of complaints policy sets out that requests for a service (e.g. reporting a repair or anti-social behaviour) will not be treated as a complaint.
1.5	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.	Yes	Provision in policy to respond to social media. Provision in procedure to respond to online reviews. A link to the Complaints page of the Hightown website is included in surveys

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

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.	Yes	Point 4.1 of Hightown's complaints policy states: <i>We will make it as easy as possible for customers to complain and will accept complaints made in person, verbally or in writing, including by email and social media. Reasonable adjustments will be made, where appropriate, to support customers with a through the complaints process.</i>
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.	Yes	Point 1.6 of Hightown's complaints policy states: <i>The complaints process, including details of each stage and contact information for the Housing Ombudsman, will be publicised in leaflets and on the Hightown website, and will be included in the tenants' newsletter each spring and the Annual Report to Residents. In relation to C&SH, this is also included in Welcome/Sign-up packs & displayed on service notice boards. Information about the complaints process will also be provided upon request and at each stage of a complaint. It will be provided in other formats (e.g. Braille, brousealoud, other languages etc upon request).</i>
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.	Yes	The Complaints policy is publicised on Hightown's website. Accessed through search function: https://www.hightownha.org.uk/residents/report-an-issue/complaints/

<p>2.5</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>Yes</p>	<p>Point 1.7 of Hightown's complaints policy states: <i>Staff handling complaints should make reasonable adjustments in the implementation of this policy, where required, to meet the needs of customers. Any such adjustments made to meet the needs of a customer will be clearly recorded.</i></p> <p>Point 2.1 of the policy confirms it has been developed in accordance with the Equality Act 2010.</p> <p>Point 4.1 of the policy states: <i>Reasonable adjustments will be made, where appropriate, to support customers with a through the complaints process.</i></p> <p>Equality and Diversity elearning is mandatory for staff at inductions and refreshers are required on periodic basis.</p>
<p>2.6</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>Yes</p>	<p>Hightown's complaints policy and the Housing Ombudsman scheme are promoted in leaflets and on website. Also periodically included in resident newsletters. Hightown's Complaint Handling Code Self-Assessment is published on Hightown's website. A link to Ombudsman Website and reference to the Complaints Handling Code is available on the Hightown website at: Compliments & complaints Hightown Housing Association (hightownha.org.uk)</p>

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Referenced in policy at Point 1.6. Also included in Formal Stage 2 responses and in leaflet enclosed in responses at every stage. Information on complaints included periodically in resident newsletters, and Ombudsman contact details are on the Complaints page of the Hightown website at: Compliments & complaints Hightown Housing Association (hightownha.org.uk)
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.	Yes	Information on the Ombudsman's Dispute Support Advice service is included in Making a Complaint leaflet which is sent with each complaint response

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	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.	Yes	Point 4.2 of Hightown's complaints policy states: <i>Where complaints are received via social media, the Communications team will alert the relevant staff member to log the complaint and make direct contact with the complainant, where they can be identified, and manage the complaint outside of the social media channel. If the customer cannot be identified, we will encourage them to make a complaint directly to us.</i>

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

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".	Yes	<p>No complaints team, but service led complaint handling. Customer Resolution Officer supports with early resolution of complaints. Responsibility for logging, investigating and responding to complaints is set out in policy at Point 5.3.3.</p> <p>The Operations Committee receives quarterly and annual reports on complaints performance, which includes lessons learned from complaints and changes made or proposed amendments to policy so that the learning is embedded. The Committee also receives the annual review of the Housing Ombudsman's Complaints Handling Code self-assessment</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Staff receive training on complaints handling. Key managers have completed Ombudsman elearning. Policy provides for line managers to investigate complaint against staff to avoid conflict of interest at Point 3.8. Procedure also references alternative Senior Manager to investigate.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • 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. 	Yes	<p>Complaints and abusive contact handling training for staff.</p> <p>Customer charter and customer service standards</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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.</p>	Yes	<p>Policy confirms that all formal complaints will be acknowledged within three working days.</p> <p>Early resolution step included in complaints policy at the request of the Residents Voice and Scrutiny Panel as they felt that it would encourage people to raise concerns, promote quick resolution of more simple issues, and would be beneficial to those who would be reluctant to go through a formal process.</p>

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.	Yes	Has been included in sample checks of complaint acknowledgements, and is outlined in the Dealing with Correspondence and Complaints procedure
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>Hightown's complaints policy states: <i>Hightown is committed to providing excellent services and to dealing with complaints fairly and impartially</i></p> <p>Policy provides for line managers to investigate complaint against staff to avoid conflict of interest at Point 3.8. Procedure also references alternative Senior Manager to investigate.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • 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. 	Yes	The investigation process outlined in Hightown's Dealing with Correspondence and Complaints procedure covers these points.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Not stipulated in policy, but is part of our approach to customer service
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>Point 5.13 of Hightown's complaints policy states: Throughout the complaints process, the customer shall be given a fair opportunity to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made

			Staff subject to the complaint would be interviewed as part of the investigation.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Referenced in the Closing a Complaint section of Hightown's complaints policy at Point 6.1 which confirms a complaint will be closed if: <i>The customer does not contact us to advise that they wish to escalate their complaint to the next stage of the complaints process within 20 working days of the date of the response at any stage.</i>
4.14	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.	Yes	Reasons for closing or refusing to escalate a complaint are outlined in Point 6.1 of Hightown's complaints policy. The Unacceptable Complainant Behaviour policy sets out Hightown's definition and response to unacceptable complainant behaviour
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.	Yes	Details and documents relating to complaints are logged and stored on the Complaints log, Hightown's contact management system (QL), document storage system, tenancy summary and estates summary.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Hightown's Unacceptable Complainant Behaviour policy is attached to the complaints policy as an appendix. Hightown's Call handling procedure also sets out Hightown's approach to managing unacceptable behaviour/customer contact

Best practice 'should' requirements

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	Yes	Hightown's complaints policy provides for full investigation for the response to address all points of the complaint. Template response letters outline giving clear reasons and explanations in cases where desired outcome is not possible.
4.4	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.	Yes	Included in policy. Early resolution step also provides opportunity for quick resolution
4.5	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.	Yes	<p>Point 3.6 of Hightown's complaints policy sets out that representatives may deal with customer complaints as follows:</p> <p><i>A non-legal representative/advocate of any of the above where Hightown has received their express authorisation for that person to pursue a complaint on their behalf (for example a friend or family member)</i></p> <p><i>A non-legal representative of any of the first four people above who does not have capacity to authorise a representative to act on their behalf</i></p> <p><i>A person with the legal capacity to make a complaint on behalf of any of the first three people above who is deceased (the Executor or Administrator of the estate).</i></p> <p>Point 3.9 of the policy also sets out that the complaints process will be offered in disrepair claims as Alternative Dispute Resolution under Clause 4.2 of the Pre-Action Protocol for Housing Repair Claims.</p>

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.	Yes	Staff review legal obligations, for example those in Tenancy Agreements and legislation when investigating and responding to a complaint. These set out Hightown's understanding of the legal position. Policy stipulates at Point 5.14 that this should not be taken as legal advice. Complainant is also signposted to sources of independent legal advice.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Point 3.4.3 of Hightown's Dealing with Correspondence and Complaints procedure states: <i>Communication with the resident should not generally identify individual members of staff or contractors as their actions are undertaken on behalf Hightown.</i>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Target acknowledgement and response dates are set out to the complainant. Where further information is needed from the complainant, additional contact will be made. Hightown's Dealing with Correspondence and Complaints Procedure includes provision for updates to complainant in longer term investigations
4.16	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.	Yes	Hightown's Complaints Scrutiny Group, made up of a panel of residents, reviews complaints handling and learning from complaints on a quarterly basis. Consideration in being given to follow up surveys for complainants as part of a new complaints logging/monitoring system which is being developed.

4.17	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	Yes	Complaints are welcomed as an opportunity to learn and drive service improvements (Point 1.3 of policy and Point 1.2 of procedure). Lessons learnt discussed with individual staff members and at team meetings
4.19	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.	Yes	Equality Act 2010 is referenced in the complaints policy. The Unacceptable Complainant Behaviour policy provides for management of unacceptable behaviour to be assessed on a case by case basis.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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.	Yes	Point 5.3.3 of the complaints policy outlines the target response time for Formal Stage 1 complaints as 10 working days. Compliance with target response time and any agreed extensions are recorded and reported through the complaints log.
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.	Yes	Referenced in Hightown's complaints policy at Point 5.3.3 regarding responding within timeframes and 5.5 regarding agreeing extensions

<p>5.6</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>	<p>Yes</p>	<p>Point 5.6 of Hightown's complaints policy states: <i>All complaints will be responded to in writing, addressing all points in the complaints and providing clear reasons for any decisions. Where the customer has requested a verbal response, this will be given and confirmed in writing.</i></p> <p>Point 4.2 of Hightown's Dealing with Correspondence and Complaints procedure states: <i>The staff member responding to a complaint 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.</i></p> <p>Complaint template response letters outline the requirements to cover all points of the complaint and reasons for any decisions.</p>
<p>5.8</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"> • 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 	<p>Yes</p>	<p>Outlined 5.6 of Hightown's complaints policy and in template response letters</p>

Stage 2

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 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.	Yes	The escalation process is outlined in Hightown's Complaints Policy and the Dealing with Correspondence and Complaints Procedure
5.10	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.	Yes	Set out in Hightown's Dealing with Correspondence and Complaints procedure as follows: <i>If, within 20 working days of the Formal Stage One response, the complainant requests to escalate their complaint to Formal Stage Two of Hightown's complaints process, the staff member receiving notification of this should obtain details of the reasons the complainant remains dissatisfied and confirm with the complainant what outcome they are seeking from their complaint.</i>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Set out in Hightown's Dealing with Correspondence and Complaints procedure as follows: <i>If, within 20 working days of the Formal Stage One response, the complainant requests to escalate their complaint to Formal Stage Two of Hightown's complaints process, the staff member receiving notification of this should obtain details of the reasons the complainant remains dissatisfied and confirm with the complainant what outcome they are seeking from their complaint.</i>

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Set out in 5.3.3 of policy. Stage One complaints are investigated by a Head of Service, Stage Two complaints by a Director or the Chief Executive.
5.13	Landlords must respond to the stage two complaint within 20 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.	Yes	Hightown's Complaints Policy sets out response time of 15 working days at 5.3.3 and extensions at 5.5
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> 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. 	Yes	Set out in Hightown's Complaints Policy at Point 5.6 and is included in template response letters

Stage 3

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.	Yes	Hightown's complaints policy stipulates a two stage formal process

5.20	<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"> • 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	Hightown does not have a 3 stage process
------	--	-----	--

Best practice 'should' requirements

Stage 1

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 landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Point 5.5 of Hightown's complaints policy states: <i>If it is not possible for a Stage 1 or Stage 2 complaint to be responded to within the timescales above, an explanation will be given to the customer and an extension to the response deadline will be agreed with them. This should not exceed a further 10 working days without good reason.</i>
5.3	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.	Yes	Point 3.4.7 of Hightown's Dealing with Correspondence and Complaints procedure states: <i>Where an agreement over an extension cannot be reached, the staff member should provide the complainant with the contact details of the Housing Ombudsman, so that they can challenge the plan or proposed timeliness of the response via the Ombudsman.</i>
5.4	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.	Yes	Set out at point 3.3.8 of Hightown's Dealing with Correspondence and Complaints procedure.

5.7	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 stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Point 3.11 of Hightown's complaints policy states: <i>Where a customer has made a complaint which is being investigated under Hightown's formal complaints process, they may provide additional information regarding the issue where applicable. However, additional unrelated matters will not be added to an existing complaint. Where an unrelated matter meets the categories of complaints outlined above, these will be logged and investigated as a separate complaint.</i>
-----	---	-----	--

Stage 2

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 landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Point 5.5 of Hightown's complaints policy states: <i>If it is not possible for a Stage 1 or Stage 2 complaint to be responded to within the timescales above, an explanation will be given to the customer and an extension to the response deadline will be agreed with them. This should not exceed a further 10 working days without good reason.</i>
5.15	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	Yes	Point 3.4.7 of Hightown's Dealing with Correspondence and Complaints procedure states: <i>Where an agreement over an extension cannot be reached, the staff member should provide the complainant with the contact details of the Housing Ombudsman, so that they can challenge the plan or proposed timeliness of the response via the Ombudsman.</i>

Stage 3

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 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 <u>within 20 working days</u> 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.	N/A	Hightown does not have a 3 stage process
5.19	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.	N/A	Hightown does not have a 3 stage process

Section 6 - Putting things right

Mandatory 'must' requirements

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.	Yes	<p>Points 5.11 and 5.12 of Hightown's complaints policy state: <i>Where the investigation into the complaint confirms that there has been a service failure, we will take reasonable steps to put it right. Where appropriate, the staff member should refer to Hightown's Compensation Policy.</i></p> <p>Hightown's Compensation policy also includes reference to compensation for service failures</p>
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.	Yes	<p>Point 5.12 of Hightown's complaints policy states: <i>Any remedy offered as a result of the complaint will reflect the extent of any and all service failure, and the level of detriment caused to the customer as a result. These will include:</i></p> <ul style="list-style-type: none"> <i>Acknowledging where things have gone wrong</i> <i>Providing an explanation, assistance or reasons</i> <i>Apologising</i> <i>Taking action if there has been a delay</i> <i>Reconsidering or changing a decision</i> <i>Amending a record</i> <i>Changing policies, procedures, or practices</i>

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.	Yes	Set out in template complaint response letters
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.	Yes	Set out in Hightown's compensation policy

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	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.	Yes	Lessons learned are recorded on the Complaints Log for each upheld complaint. Lessons learned and changes made to service provision are reported in the Annual Report to Residents.
6.7	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.	Yes	Set out in compensation policy, although does not make reference to seeking legal advice

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

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.	Yes	Annual report to residents, resident newsletters, Complaints Scrutiny Group and Residents Voice and Scrutiny Panel receive information on complaints and service delivery. Discussed individually with staff and at team meetings

Best practice 'should' requirements

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 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.	Yes	Hightown's Operations Committee is the named corporate body responsible for monitoring and scrutinising complaints, with the Chair of the Committee named as the Complaints Champion.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> 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. 	Yes	Complaints volumes and escalations reported monthly by Head of Housing and Head of C&SH Support, these are considered by Directors and uploaded onto Board portal. Operations Committee receive quarterly reports on complaints, including Formal Stage 2 complaints and all Ombudsman determinations. Annual self-assessment considered by Operations committee Annual report on complaints goes to Operations Committee each July

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.	Yes	Complaints themes and trends considered by Complaints Scrutiny Group and Head of Housing.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • 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. 	Yes	Objectives for complaints handling are set out in the Complaints Policy.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

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.	Yes	Annual self-assessment carried out in July of each year.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Would be completed as part of policy review or restructure of complaints handling
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> • 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 	Yes	Self-Assessment considered at Operations committee, then will be published on website to replace previous self-assessment. Link to self assessment to be included in Annual Report to Residents