

## Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.3 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	<p>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.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 2.4 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></p> <p>Point 2.11 of Hightown's Complaints Policy sets out details of third parties and representatives entitled to make a complaint. These complaints are handled in line with our Complaints Policy.</p>
1.4	<p>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.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 2.14 of Hightown's Complaints policy states : Requests for a service <i>A service request is a request from a resident to Hightown requiring action to put something right (e.g. reporting a repair or anti-social behaviour). Service requests are not complaints, but will be recorded, monitored and reviewed regularly.</i></p>

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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.17 of Hightown's Complaints Policy states: <i>A complaint will be raised if a resident expresses dissatisfaction with Hightown's response to their service request, even if the handling of the service request is ongoing. Hightown will continue to address the service request where a complaint is made.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.14 of Hightown's Complaints Policy states: <i>An expression of dissatisfaction received through a survey response is not defined as a complaint, however, Hightown will provide details on how to complain in all surveys.</i>  A link to the Complaints page of the Hightown website is included in surveys.

## 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	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.14 of Hightown's Complaints Policy sets out the matters which are not classed as complaint under the policy.  Point 2.15 of the Policy states: <i>Hightown will not take a blanket approach to excluding complaints, and will consider the individual circumstances of each complaint.</i>
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: <ul style="list-style-type: none"> <li data-bbox="360 1230 853 1337">• The issue giving rise to the complaint occurred over twelve months ago.</li> </ul>	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.14 of Hightown's Complaints Policy sets out the matters which are not classed as complaint under the policy as follows: <ul style="list-style-type: none"> <li data-bbox="1626 1118 2007 1369">• <i>The issue or the complainant becoming aware of the issue giving rise to the complaint occurred more than twelve months prior to the complaint being made.</i></li> </ul>

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			<ul style="list-style-type: none"> <li>• <i>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.</i></li> <li>• <i>Requests for a service. A service request is a request from a resident to Hightown requiring action to put something right (e.g. reporting a repair or anti-social behaviour). Service requests are not complaints, but will be recorded, monitored and reviewed regularly.</i></li> <li>• <i>Requests for advice or information</i></li> <li>• <i>Provision of parking</i></li> <li>• <i>Disputes regarding any terms and conditions of any agreement signed by the individual (e.g. tenancy agreement, lease, licence)</i></li> <li>• <i>Valuation levels</i></li> <li>• <i>Expressions of dissatisfaction or concerns from external C&amp;SH stakeholders (e.g. care managers, service finders, statutory professionals)</i></li> </ul>
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				<p><i>about a member of C&amp;SH staff or management, a policy, or approach to management of premises</i></p> <ul style="list-style-type: none"> <li>• <i>Where there is a commercial or contractual relationship that is not connected with the customer's application for, or occupation of, a property.</i></li> <li>• <i>Anonymous complaints</i></li> <li>• <i>An expression of dissatisfaction received through a survey response is not defined as a complaint, however, Hightown will provide details on how to complain in all surveys.</i></li> <li>• <i>Matters that have already been considered under this policy.</i></li> </ul>
2.3	<p>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.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 2.14 of Hightown's Complaints Policy sets out that complaints will not be managed under the policy where: <i>The issue or the complainant becoming aware of the issue giving rise to the complaint occurred more than twelve</i></p>

				<p><i>months prior to the complaint being made.</i></p> <p>Point 2.16 of the Policy states: <i>Hightown may apply discretion to accept complaints outside of the twelve month timeframe where there are good reasons to do so.</i></p>
2.4	<p>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.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 2.18 of Hightown's Complaints Policy states: <i>Hightown will accept a complaint unless there is a valid reason not to do so. 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 and signposting to the Housing Ombudsman Service.</i></p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 2.15 of Hightown's Complaints Policy states: <i>Hightown will not take a blanket approach to excluding complaints, and will consider the individual</i></p>

				<i>circumstances of each complaint</i>
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### 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.	Yes	<a href="#">complaints-policy.pdf</a>  <a href="#">edi-policy-2024.pdf</a>  <a href="#">complaints-handling-procedure.pdf</a>	<p>Point 3.1 of Hightown's Complaints Policy states: <i>Hightown will make it as easy as possible for customers to complain and provide different channels through which a complaint can be made. Complaints can be made in person, phone call, verbally or in writing, including by email and social media (where Hightown has a profile).</i></p> <p>The method used to make the complaint is recorded on the complaints log.</p> <p>Point 3.2 of the Policy states: <i>Hightown will adhere to the requirements of the Equality Act 2010 and consider any reasonable adjustments needed, where appropriate,</i></p>

			<p><i>to support customers to access and go through the complaints process.</i></p> <p><i>Point 4.11 of the Complaints Policy states: An interpreter or other relevant support in making a complaint will be provided upon request.</i></p> <p><i>Point 4.11 of Hightown's Equality, Diversity and Inclusion Policy states: We are committed to ensuring that no one is disadvantaged in accessing our services. To this end, we will respond to reasonable adjustment requests from customers and staff in line with the Equality Act. Given there is no prescribed list of adjustments; they depend on the individuals need, upon receipt of a request, we will discuss requirements and seek to reach an agreement on what is reasonable given the circumstances. We will let people know that we can</i></p>
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			<p><i>provide reasonable adjustments by publishing and raising awareness of our policy.</i></p> <p>Point 3.10 of Hightown's Complaints Handling procedure sets out reasonable adjustments: <i>Reasonable adjustments to the complaints process may be required to meet the needs of vulnerable customers. Reasonable adjustments may include changing the way in which the complaint is handled or responded to to meet the diverse needs of complainants. Where an adjustment is made the nature of the adjustment and the reasons for it must be clearly recorded on the Notes tab of the Complaints Log.</i></p> <p>Staff receive mandatory Equality and Diversity training.</p>
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				An Equality Impact Assessment has been completed in the review of the Complaints Policy.
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 3.3 of Hightown's Complaints Policy states: <i>A complaint can be raised in any way with any member of staff. All staff are made aware of the complaints process and will pass the complaint on to the Complaints and Resolution Team to deal with the complaint.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 7.2 of Hightown's Complaints Policy states: <i>High volumes of complaint are not seen as a negative, as they can be indicative of a well publicised and accessible complaints process.</i>  Point 7.1 of Hightown's Complaints Policy states: <i>All complaints will be centrally logged on the Complaints Log for monitoring compliance with this policy.</i>

				Complaints volumes and themes are recorded and reported to the Operations Committee and Board.
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">Hightown Compliments, complaints and feedback - Hightown Housing Association</a>	<p>The complaints policy and associated information is published on Hightown's website. An easy read guide to the procedure is also available. Hard copies can be provided upon request.</p> <p>A leaflet about Hightown's complaints process is provided to new tenants in sign up packs and a printed version is available in the Hightown offices reception area.</p> <p>An article on Hightown's complaints process is published in annually in the residents' newsletter.</p>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<a href="#">complaints-policy.pdf</a>	Point 6.2 of Hightown's Complaints Policy sets out that Hightown will publicise details of complaints

			<a href="#">Hightown Compliments, complaints and feedback - Hightown Housing Association</a>	<p>process on website and in leaflets.</p> <p>A dedicated webpage on the Hightown website sets out the complaints process and details of the Ombudsman.</p>
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.11 of Hightown's Complaints Policy sets out that 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)
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">Hightown Compliments, complaints and feedback - Hightown Housing Association</a>	<p>Hightown's complaints policy sets out information to be provided to residents regarding the Housing Ombudsman Service throughout the document.</p> <p>Information about the Housing Ombudsman Service is available on Hightown's website and is</p>

				<p>included in resident newsletters.</p> <p>Template complaint response letters include information about the Housing Ombudsman Service and contact details.</p>
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## 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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	<p>Section 10 of Hightown's Complaints Policy and Section 15 of Hightown's Complaints Handling Procedure set out roles and responsibilities for complaints handling, monitoring and reporting</p> <p>Point 4.9 of Hightown's Complaints Policy states: A Team Member from a different department to the complaint issue may be asked to support an investigation to demonstrate an independent review. The person investigating a complaint at any stage should speak to or arrange a meeting with the complainant, (with the Complaints and Resolution Officer / Manager as appropriate) to discuss the matter and to understanding</p>



				<p>the resolution the customer is seeking.</p> <p>Hightown has recently restructured its staff resource for complaint handling with the introduction of a new Customer Resolution team. The accountability as Director level has been reassigned to the Director of Corporate Services, with delegated responsibility to the newly appointed Complaints and Resolution Manager.</p> <p>.</p> <p>The Complaints and Resolution Manager and Head of C&amp;SH Support will report monthly and quarterly on the number of complaints received and escalated and the service areas to which they pertain. The Director of Corporate Services monitors these reports and presents at Directors group and Board meetings.</p>
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4.2	<p>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.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>The Complaints and Resolution Team has a good working relationship across the organisation, working with staff in different teams on a day to day basis to support with the prompt and fair resolution of complaints.</p> <p>The Complaints and Resolution Manager chairs internal learning from complaints meetings quarterly and has the autonomy to resolve disputes promptly and fairly.</p>
4.3	<p>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</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p> <p><a href="#">hightown-annual-report-2024.pdf</a></p> <p><a href="#">annual-report-for-residents-2023-24.pdf</a></p> <p><a href="#">annual-complaint-performance-and-service-improvement-report-2023-24.pdf</a></p>	<p>Complaints and Resolution team meet quarterly with the Service Managers to review learning from complaints, as set out in point 9.2 of Hightown's Complaints Policy.</p> <p>Learning from complaints is publicised to residents in the Annual report for residents and regular newsletters</p>

## 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.	Yes	<a href="#">complaints-policy.pdf</a>  <a href="#">higher-risk-building-complaints-policy.pdf</a>	<p>A single Complaints policy is in place</p> <p>In accordance with the Building Safety Act 2022 there is a separate High Risk Buildings Complaints policy, which set out Hightown's policy on "relevant complaints" associated with Higher Risk Buildings as defined under the Act.</p>
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.	Yes	<a href="#">complaints-policy.pdf</a>	<p>There are no informal complaint stages within Hightown's Complaints policy.</p>
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	<a href="#">complaints-policy.pdf</a>	<p>Hightown has a two stage complaints process as set out in the policy</p>

	complaint process unduly long and delay access to the Ombudsman.			
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.	Yes	<a href="#">complaints-policy.pdf</a>	All complaints are managed internally. Complaints about contractors are managed under Hightown's complaints policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="#">complaints-policy.pdf</a>	All complaints are managed internally.
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	Point 3.7 of Hightown's Complaints Handling procedure states: <i>The complaint must be acknowledged within five working days to set out Hightown's understanding of the complaint and confirm the complaint reference number.</i>  Point 4.14 of Hightown's Complaints Policy states: <i>Throughout the complaints process, the customer shall be given a fair opportunity to:</i>

				<ul style="list-style-type: none"> <li>• <i>set out their position</i></li> <li>• <i>comment on any adverse findings before a final decision is made</i></li> </ul> <p>Hightown's understanding of the complaint is set out in complaint responses.</p>
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.	Yes	<a href="#">complaints-policy.pdf</a>	<p>Reasons for not accepting a complaint are set out in the complaints policy 2.14 and explained to the complainant, making it clear any aspects of the complaint that Hightown is not responsible for.</p> <p>Complaint responses will signpost to third party responsibility where applicable.</p>
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> </ul>	Yes	<a href="#">complaints-policy.pdf</a>	Point 5.2 of Hightown's Complaints Handling procedure sets out the points required in point 5.8 of the Complaints Handling Code.

	<ul style="list-style-type: none"> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.5 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 detailed. The contact details for the Ombudsman service will also be provided. Any extension to a complaint response timescale must not exceed a further 10 working days for Stage 1 or 20 working days for Stage 2 without good reason.</i>
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	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">edi-policy-2024.pdf</a>	Point 1.6 of Hightown's complaints policy states: <i>Staff handling complaints should make reasonable adjustments in the implementation of this policy, where required, to</i>

	<p>reasonable adjustments must be kept under active review.</p>			<p><i>meet the needs of customers. Any such adjustments made to meet the needs of a customer will be clearly recorded.</i></p> <p>The central complaints logging system captures records of adjustments agreed and made.</p> <p>Point 4.11 of Hightown's Equality, Diversity and Inclusion Policy states: <i>We are committed to ensuring that no one is disadvantaged in accessing our services. To this end, we will respond to reasonable adjustment requests from customers and staff in line with the Equality Act. Given there is no prescribed list of adjustments; they depend on the individuals need, upon receipt of a request, we will discuss requirements and seek to reach an agreement on what is reasonable given the circumstances. We will</i></p>
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				<p><i>let people know that we can provide reasonable adjustments by publishing and raising awareness of our policy.</i></p> <p>Hightown's Equality and Diversity Disabilities and vulnerabilities are recorded on Hightown's Housing Management system. A flag system is in place on the Complaints Log which enables the Complaints and Resolution team to identify any known needs of the resident.</p> <p>All Hightown staff receive mandatory training on equality, diversity and inclusion.</p> <p>Hightown's complaints policy has undergone an Equality Impact Assessment.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has		<a href="#">complaints-policy.pdf</a>	Matters that will not be treated as a complaint are set out point 2.14 of



	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.			Hightown's complaints policy. In practice, Hightown has not refused to escalate a complaint through its internal complaints process.
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.	Yes	<a href="#">complaints-handling-procedure.pdf</a>	Hightown has a central logging system for Complaints, in which full records of the complaint and outcomes are logged.  Requirements for logging complaints and all associated correspondence are set out in in Hightown's Complaints Handling procedure
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.	Yes	<a href="#">complaints-policy.pdf</a>	The aim of Hightown's Complaints Policy is to resolve complaints at the earliest opportunity
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	Yes	<a href="#">complaints-policy.pdf</a>	Hightown's approach to unacceptable complainant behaviour is set out at Appendix 1 of the Complaints policy

	must keep restrictions under regular review.			
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">edi-policy-2024.pdf</a>	Hightown's approach to unacceptable complainant behaviour is set out at Appendix 1 of the Complaints policy. The policy has undergone an Equality Impact Assessment.

## 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.	Yes	<a href="#">complaints-policy.pdf</a>	<p>The aim of Hightown's complaints process is to resolve complaints at the earliest opportunity.</p> <p>Point 4.1 of Hightown's Complaints Policy states: <i>Hightown aims to resolve complaints as early as possible and will consider which complaints can be responded to as early as possible, and which require further investigation taking into consideration factors such as the complexity of the complaint and whether the complainant is vulnerable or at risk.</i></p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">complaints-policy.pdf</a>	The timescale of five working days to log and acknowledge a complaint is set out at point 4.2 of Hightown's Complaints Policy.

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.4 of Hightown's Complaints Policy has a table which sets out a 10 working day response target for Stage 1 complaints. The Complaints leaflet sets out the timescales for our responses to complaints in a flowchart
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.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.5 of Hightown's 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 detailed. The contact details for the Ombudsman service will also be provided. Any extension to a complaint response timescale must not exceed a further 10 working days for Stage 1 or 20 working days for Stage 2 without good reason.</i>
6.5	When an organisation informs a resident about an extension to these	Yes	<a href="#">complaints-policy.pdf</a>	Point 6.4 of Hightown's Policy states: <i>If it is not possible for a Stage 1 or</i>

	timescales, they must be provided with the contact details of the Ombudsman.			<i>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 detailed. The contact details for the Ombudsman service will also be provided. Any extension to a complaint response timescale must not exceed a further 10 working days for Stage 1 or 20 working days for Stage 2 without good reason.</i>
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.	Yes	<a href="#">complaints-handling-procedure.pdf</a>	Point 5.8 of Hightown's Complaints Handling procedure states: <i>Complaint responses must be sent to the complainant once the investigation has been carried out, and within the prescribed timescales. Responses should not be deferred to when outstanding actions relating to the complaint have been completed. Outstanding actions will be tracked by the Customer</i>

				<i>Resolution Officer, and updates provided to the complainant.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	<p>Point 4.13 of the Complaints Policy states: <i>Any remedy offered as a result will reflect the extend 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"> <li><i>Acknowledging where things have gone wrong •</i></li> <li><i>Providing an explanation, assistance or reasons •</i></li> <li><i>Apologising •</i></li> <li><i>Taking action if there has been a delay •</i></li> <li><i>Reconsidering or changing a decision •</i></li> <li><i>Amending a record or adding a correction or addendum •</i></li> <li><i>Changing policies, procedures, or practices</i></li> </ul> <p>.....</p> <p>Point 5.2 of Hightown's Complaints Handling procedure states: <i>The response to a complaint must address all points raised in the</i></p>

				<p><i>complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. They must:</i></p> <ul style="list-style-type: none"> <li><i>• deal with complaints on their merits</i></li> <li><i>• act independently and have an open mind</i></li> <li><i>• take measures to address any actual or perceived conflict of interest</i></li> <li><i>• consider all information and evidence carefully</i></li> <li><i>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</i></li> </ul> <p>Complaint response letters are based on templates recommended by the Ombudsman.</p>
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	Yes	<a href="#">complaints-policy.pdf</a>	Point 2.19 of Hightown's Complaints Policy states: <i>Where a customer has made a complaint which is being investigated under</i>

	<p>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.</p>			<p><i>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></p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 4.6 of Hightown's Complaints Policy states: <i>At the completion of each stage of the complaints process we will write to the customer advising them of the following:</i></p> <ul style="list-style-type: none"> <li>• <i>The complaint stage</i></li> <li>• <i>The outcome of the complaint</i></li> <li>• <i>The reasons for any decisions made</i></li> <li>• <i>The details of any remedy being offered to put things right</i></li> </ul>



				<ul style="list-style-type: none"> <li>• <i>Details of any outstanding actions</i></li> <li>• <i>Details of how to escalate the matter if the customer remains dissatisfied</i></li> </ul>
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## 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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	Section 6.2 of Hightown's Complaints Handling procedure sets out that complaints are escalated to Stage 2 where the complainant is dissatisfied with the Stage 1 response. Point 4.7 of the Complaints Policy states: <i>Complainants are not required to explain their reasons for requesting to escalate their complaint to formal stage Two.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	The timescale of five working days to log and acknowledge a complaint is set out at point 4.3 of Hightown's Complaints Policy.

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.		<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	Point 4.7 of Hightown's Complaints Policy confirms that complainants are not required to explain their reasons for requesting to escalate their complaint to Formal Stage Two.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.4 of Hightown's Complaints policy sets out a table advising that Stage 1 complaints are responded to by Complaints and Resolution Officer or C&SH Operations Manager and that 2 complaints are investigated and responded to by a the Complaints and Resolution Manager or C&SH Contracts Manager.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.4 of Hightown's Complaints Policy sets out a table advising 20 working day response target for Stage 2 complaints.
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,	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.5 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</i>

	and the reason(s) must be clearly explained to the resident.			<i>the customer and an extension to the response deadline detailed. The contact details for the Ombudsman service will also be provided. Any extension to a complaint response timescale must not exceed a further 10 working days for Stage 1 or 20 working days for Stage 2 without good reason.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	Hightown's Complaints policy and procedure confirms that Hightown will provide contact details for the Ombudsman throughout the internal complaints process
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	Point 5.8 of Hightown's Complaints Handling procedure states: <i>Complaint responses must be sent to the complainant once the investigation has been carried out, and within the prescribed timescales. Responses should not be deferred to when outstanding actions relating to the complaint have been completed.</i>

				<i>Outstanding actions will be tracked by the Customer Resolution Officer, and updates provided to the complainant.</i>
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.	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	<p>Point 5.2 of Hightown's Complaints Handling procedure states: <i>The response 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. They must:</i></p> <ul style="list-style-type: none"> <li>• <i>deal with complaints on their merits</i></li> <li>• <i>act independently and have an open mind</i></li> <li>• <i>take measures to address any actual or perceived conflict of interest</i></li> <li>• <i>consider all information and evidence carefully</i></li> <li>• <i>keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</i></li> </ul>

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol>	Yes	<a href="#">complaints-policy.pdf</a>	<p>Point 4.6 of Hightown's Complaints Policy states: <i>At the completion of each stage of the complaints process we will write to the customer advising them of the following:</i></p> <ul style="list-style-type: none"> <li>• <i>The complaint stage</i></li> <li>• <i>Definition of the complaint</i></li> <li>• <i>The outcome of the complaint</i></li> <li>• <i>The reasons for any decisions made</i></li> <li>• <i>The details of any remedy being offered to put things right</i></li> <li>• <i>Details of any outstanding actions</i></li> <li>• <i>Details of how to escalate the matter if the customer remains dissatisfied</i></li> </ul>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<a href="#">complaints-policy.pdf</a> <a href="#">complaints-handling-procedure.pdf</a>	<p>Complaint response letters confirm the method of investigation, including staff involved in the investigation and the issuing of the response</p>

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p><a href="#">complaints-policy.pdf</a></p> <p><a href="#">complaints-handling-procedure.pdf</a></p>	<p>Point 4.13 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"> <li>• <i>Acknowledging where things have gone wrong</i></li> <li>• <i>Providing an explanation, assistance or reasons</i></li> <li>• <i>Apologising</i></li> <li>• <i>Taking action if there has been a delay</i></li> <li>• <i>Reconsidering or changing a decision</i></li> <li>• <i>Amending a record or adding a correction or addendum</i></li> <li>• <i>Changing policies, procedures, or practices</i></li> </ul>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p><a href="#">complaints-policy.pdf</a></p>	<p>Point 4.13 of Hightown's Complaints Policy states: <i>Any remedy offered as a result of the complaint will reflect the extent of any</i></p>

				<p><i>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"> <li><i>• Acknowledging where things have gone wrong</i></li> <li><i>• Providing an explanation, assistance or reasons</i></li> <li><i>• Apologising</i></li> <li><i>• Taking action if there has been a delay</i></li> <li><i>• Reconsidering or changing a decision</i></li> <li><i>• Amending a record or adding a correction or addendum</i></li> <li><i>• Changing policies, procedures, or practices</i></li> </ul>
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.	Yes	<a href="#">complaints-policy.pdf</a>	Remedies offered are set out in complaint response letters
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<a href="#">complaints-policy.pdf</a>	Point 4.12 of Hightown's Complaints Policy confirms: Where the investigation into the complaint confirms that there has been a service failure, we will take reasonable steps to put it right. Consideration will be given to the Ombudsman's

				<i>Guidance on remedies. Where appropriate, the staff member should refer to Hightown's Compensation Policy.</i>
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## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p><a href="#">annual-complaint-performance-and-service-improvement-report-2023-24.pdf</a></p>	<p>An annual report is available on Hightown's website and covers the requirements outlined in the Code.</p>

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.	Yes	<a href="#">annual-complaint-performance-and-service-improvement-report-2023-24.pdf</a>	The Hightown Board last received an annual complaints performance report in June 2024. The 2023/24 annual report and self-assessment have been published on Hightown's website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<a href="#">Hightown Compliments, complaints and feedback - Hightown Housing Association</a>	Hightown carried out a further self-assessment in November 2024 following a restructure which introduced a dedicated Complaints and Resolution team
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<a href="#">complaints-policy.pdf</a>	Hightown originally carried out a review of the Complaints Policy following discussion with the Ombudsman in November 2023. The self-assessment was reviewed, updated and submitted to the Ombudsman at this time. As Hightown has recently created a Complaints and Resolution team to enable complaints to be managed consistently and objectively It has updated its Complaints Policy to reflect the changes, and a further

				self-assessment has been completed
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.	Yes	<a href="#">complaints-policy.pdf</a>	Hightown is aware of its obligations in this regard. The Communications Team would lead on informing any residents who may be affected and the Complaints and Resolution Manager or Director of Corporate Services would lead on notifying the Ombudsman in the event of non-compliance with the Code due to exceptional circumstances.

## 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.	Yes	<a href="#">complaints-policy.pdf</a>	The Complaints and Resolution Team meets with service managers quarterly to review lessons learned and service improvements from complaints. Trends in complaints are reported quarterly to Hightown's Operations Committee and Complaints Scrutiny Group
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.	Yes	<a href="#">complaints-policy.pdf</a>	As set out in point 1.3 of the Complaints Policy, Hightown welcomes complaints as an opportunity to improve and develop services. We are committed to learning from customer feedback and proactively use this to drive service improvements
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	Yes	<a href="#">annual-complaint-performance-and-service-improvement-report-2023-24.pdf</a>  <a href="#">hightown-annual-report-2024.pdf</a>	Quarterly and Annual complaints performance reports are presented to Operations Committee and Board.

	stakeholders, such as residents' panels, staff and relevant committees.		<a href="#">annual-report-for-residents-2023-24.pdf</a>	<p>Hightown's Complaints Scrutiny Group, made up of residents, meet quarterly to consider themes and learning from complaints.</p> <p>The Annual Report to Residents includes complaints information and lessons learned.</p> <p>The Annual Complaints Report and Service Improvement Plan is published on the Hightown website.</p> <p>You Said/We Did is included in resident newsletters.</p>
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.	Yes	<a href="#">complaints-handling-procedure.pdf</a>	<p>The Director of Corporate Services is accountable for complaint handling and reporting. Complaints are managed and monitored by the Complaints and Resolution Manager on a daily basis. Reported on monthly to the Directors group, quarterly and annually by the Director of Corporate Services</p>

				Operations Committee and Board.
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').	Yes	Hightown's Operations Committee terms of reference states that it is the responsibility of the Committee Chair <i>To act as Complaints Lead on behalf of the Association as required by the Complaints Handling Code.</i>	Hightown's Operations Committee is the named corporate body responsible for monitoring and scrutinising complaints, which the Chair of the Committee named as the MRC.
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.	Yes	Hightown's Operations Committee Terms of Reference state that it is a function of the Committee <i>To receive reports on complaints from residents/service users/Complaints Scrutiny Group and an annual report on complaints.</i>	Complaints performance is reported to the Operations Committee quarterly and annually. The Annual Complaints Report is also presented to the Board. Meeting minutes record outcomes from Board and Committee consideration of complaints.
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	Yes	Hightown's Operations Committee Terms of Reference state that it is a function of the Committee <i>To receive reports on complaints from residents/service users/Complaints Scrutiny Group and an annual report on complaints.</i>	Complaints performance is reported to the Operations Committee quarterly and annually. The Annual Complaints Report is also presented to the Board. Meeting minutes record outcomes from Board and Committee consideration of complaints.

	<p>investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p><a href="#">customer-charter-may-23-final.pdf</a></p> <p><a href="#">Hightown's Mission, Values and Culture - Hightown Housing Association</a></p>	<p>Hightown's Corporate Vision and Values.</p> <p>Objectives are set during staff annual appraisal process.</p> <p>Job Descriptions include a requirement to comply with Hightown's Policies and Procedures, which includes complaints for relevant employees.</p>