

## 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	This definition is used in the policy and procedure and also on our website:  <a href="#">Make a complaint to Hastoe - Hastoe Group</a>	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Section 4.2 of our complaints policy and section 3.2 of our complaints procedure state:  <i>"A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction we will give them the choice to make a complaint. This includes complaints submitted by a third party or resident representative."</i>	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken	Yes	This is detailed in section 6 of our complaints policy:  <i>"Service requests are requests made by residents requiring action from Hastoe to put</i>	

	<p>to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>		<p><i>something right, such as a missed appointment, or a complaint about a neighbour. Where these are issues that can be easily put right by contacting a contractor on the resident's behalf, or raising a case for a Housing Officer to investigate antisocial behaviour, for example, we will not raise these as a complaint.</i></p> <p><i>If, however, the resident is dissatisfied with the repetitiveness of issues with handling a repair, or the resident is dissatisfied with how we've managed previous complaints of ASB, for example, then the issue should be logged as a formal complaint."</i></p> <p>In addition, section 7 of our complaints procedure details this further for staff handling complaints, including flow charts taken from the complaint handling code to assist staff in this.</p> <p>This procedure also contains details of how to log service requests on our system to enable recording, monitoring and review.</p>	
1.5	<p>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.</p>	Yes	<p>This is detailed in section 9 of our complaints procedure in relation to logging and acknowledging formal complaints:</p> <p><i>"When an issue arises that either should not or could not be resolved as a Service Request, then the member of staff should log a call on the ActiveH CRM and raise a task to the Customer Services team."</i></p>	

			<p>The responsibility for ensuring that the service request is addressed then sits with the complaint handler. At no point do staff stop their efforts in addressing the issues raised.</p>	
1.6	<p>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.</p>	Yes	<p>As part of the TSM satisfaction survey in 2023, we gave residents the opportunity to provide their details where they were dissatisfied with services. 107 residents provided this information, and they were all given the opportunity to discuss this with a director. 3 of these residents took this opportunity. In the current year, this will go further to ensure that all respondents are made aware of how to raise a complaint should they wish to.</p> <p>Residents who express dissatisfaction with our repairs service through the satisfaction survey sent following the completion of a repair are contacted by a member of the Property Services team. Moving forwards they will be given the opportunity to also raise a complaint at this point should they wish to.</p> <p>The same will apply to residents who complete the call handling survey following contact with our Customer Services team.</p>	

## 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	<p>This is detailed in section 4.3 of our complaints policy:            There are some exclusions whereby we will not investigate an issue as a complaint as follows:</p> <p><i>“The issue that is being complained about happened over twelve months ago. If there is a good reason why the issue wasn’t raised prior to this time we may consider this as a complaint, but this will be at our discretion.</i></p> <p><i>Legal proceedings have started and a claim has been filed at court.</i></p> <p><i>Matters that have previously been considered under the complaints policy.”</i></p> <p>As part of our procedure we have created a letter template that ensures that any refusal to accept a complaint is clearly explained to the resident and the resident is given the details of the HOS if they wish to challenge this decision.</p>	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or	Yes	As Above	

	<p>escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <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>			
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>This is included in section 4.3 of the Complaints policy:</p> <p><i>“The issue that is being complained about happened over twelve months ago. If there is a good reason why the issue wasn’t raised prior to this time we may consider this as a complaint, but this will be at our discretion.</i></p> <p>Also in section 7 of our Complaints policy:</p> <p><i>“Reasonable adjustments will be made to accommodate a complainant’s needs in</i></p>	

			<p><i>accordance with the Equality Act 2010. This may include changes to the complaints policy, procedure or process.”</i></p> <p>In addition, in our Complaints Procedure, section 4:</p> <p><i>“At all parts of our complaints process, those involved in logging, investigating and responding to complaints should consider whether reasonable adjustments are required either to this procedure or other policies and procedures to take into account any vulnerabilities presented by the complainant.”</i></p> <p>There is also a review conducted of any issue raised where it is being considered to not accept it as a complaint, as detailed in our Complaints Procedure section 6.2:</p> <p><i>“Where it is considered that the complaint should be excluded from our process, the issue should be tasked to the Customer Services Manager who will decide whether or not to exclude the complaint. Where it is decided that we will not accept a complaint, a detailed explanation will be provided to the complainant and the right to take the decision to the Ombudsman. The individual circumstances of each complaint will be considered by the Customer Services Manager before making this</i></p>	
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			<i>decision. Letter 1 must be used in these circumstances.”</i>	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	This is set out in our Complaints policy and procedure as detailed in the sections above.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is set out in our Complaints policy and procedure as detailed in the sections above	



### 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	<p>This is detailed in section 4.5 – 4.7 of our Complaints policy:</p> <p><i>“We aim to make it as easy as possible to make a complaint. A complaint can be made to Hastoe by:</i></p> <ul style="list-style-type: none"> <li>• <i>Telephone</i></li> <li>• <i>Face to face</i></li> <li>• <i>SMS</i></li> <li>• <i>The Hastoe website or MyHastoe portal</i></li> <li>• <i>In writing by letter or email</i></li> <li>• <i>A third party such as an MP, Councillor, advocate, friend or family member.</i></li> </ul> <p><i>Although the complainant will have to give permission in most circumstances.</i></p> <p><i>If a resident raises a complaint via social media, we will not deal with the complaint via social media, but we will advise how they can raise a formal complaint using another channel.</i></p> <p><i>Residents can raise their complaints with any member of Hastoe staff, who will advise the</i></p>	

		<p><i>Customer Services team of the complaint so that it can be formally logged on our systems.”</i></p> <p>This information is also included on our website:</p> <p><a href="https://www.hastoe.com/contact-us/make-a-complaint/">https://www.hastoe.com/contact-us/make-a-complaint/</a></p> <p>Reasonable Adjustments are addressed in section 7.1 – 7.2 of our Complaints policy:</p> <p><i>“Reasonable adjustments will be made to accommodate a complainant’s needs in accordance with the Equality Act 2010. This may include changes to the complaints policy, procedure or process.</i></p> <p><i>When investigating a complaint, the complaint handler will consider whether reasonable adjustments should have been made to policies, procedures or processes relevant to the complaint to accommodate the needs of the complainant.”</i></p> <p>In addition, in section 4.1 of our Complaints procedure:</p> <p><i>“At all parts of our complaints process, those involved in logging, investigating and responding to complaints should consider</i></p>	
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			<i>whether reasonable adjustments are required either to this procedure or other policies and procedures to take into account any vulnerabilities presented by the complainant.”</i>	
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	<p>This is detailed in Section 4 of our Complaints policy:</p> <p><i>“Residents can raise their complaints with any member of Hastoe staff, who will advise the Customer Services team of the complaint so that it can be formally logged on our systems.”</i></p> <p>In addition, all staff are advised about our Complaints policy and procedures via their managers to ensure that complaints are passed to our Customer Services team and full copies of our Policy and Procedure are located on the staff intranet to ensure that all staff have access to them.</p>	
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	<p>Complaints are not seen as negative, and our focus is on using complaints to learn lessons and improve services.</p> <p>A key area of system monitoring against complaints is the lessons learned/service improvements.</p>	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	This is on our website:	

	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.		<a href="https://www.hastoe.com/contact-us/make-a-complaint/">https://www.hastoe.com/contact-us/make-a-complaint/</a>  Our website also has Google Accessibility functionality to allow for translation, for the text to be read to the user, and to change contrasts and fonts.  We have a leaflet that summarises our policy and the complaints process to make this easy to understand and this is sent if people request information about our complaints policy but are unable to access our website, and when all complaints are acknowledged.	
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	This is covered in section 2.2 of the complaints policy:  <i>"This policy will be publicised on our website, resident newsletters, the annual tenant report and via other communications such as appropriate emails and letters and by our own staff in conversation with residents."</i>	
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	This is detailed in section 4.5 of our Complaints policy:  <i>"We aim to make it as easy as possible to make a complaint. A complaint can be made to Hastoe by:....."</i>	

			<ul style="list-style-type: none"> <li>• <i>A third party such as an MP, Councillor, advocate, friend or family member. Although the complainant will have to give permission in most circumstances.”</i></li> </ul>	
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	<p>This information is included on our website:  <a href="https://www.hastoe.com/contact-us/make-a-complaint/">https://www.hastoe.com/contact-us/make-a-complaint/</a></p> <p>In the complaints information sent out with every stage one complaint acknowledgement and in each template response letter sent to residents during the complaints process.</p>	

## 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	This is set out in section 6.2 of our Complaints policy:  <i>"The Housing Director has responsibility for ensuring that complaints are reported to the Board and will lead in liaison with the Housing Ombudsman. The Housing Director will act as the 'complaints officer' as defined by the Housing Ombudsman's complaint handling code."</i>	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Complaints Officer is a director so has access to all staff at all levels and the authority and autonomy to resolve disputes promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Staff involved in the complaints handling process have objectives set in relation to complaint handling. In January 2024 all staff handling complaints received in house training delivered by HQN.	

			<p>By October 2023 all staff handling complaints completed the Housing Ombudsman Service elearning.</p> <p>As the majority of our complaints are in relation to repairs and maintenance services, we have recruited an additional member of staff in our Property Services team with responsibility of solely dealing with complaints to ensure that they are given the necessary priority.</p>	
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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We only have one Complaints policy.	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	We only have a 2 stage complaints process in compliance with the Complaint Handling Code.	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	We only have a 2 stage complaints process in compliance with the Complaint Handling Code.	

	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	This is not applicable as we deal directly with all complaints about Hastoe services, whether they are delivered directly by Hastoe staff or contractors.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Not applicable, as above.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<p>This is set out in section 10.1 of our Complaints policy in relation to stage one complaints:</p> <p><i>"The acknowledgement will clearly detail what the complaint is about and what the complainant would like as an outcome to their complaint."</i></p> <p>11.2 of our Complaints policy in relation to stage two complaints:</p> <p><i>"The acknowledgement must be clear on what the complaint is in relation to and what the complainant is requesting as an outcome."</i></p>	



			<p>It is also set out in section 9.2 of our Complaints procedure in relation to stage one complaints:</p> <p><i>“When this is received by the Customer Services team, either directly from the resident or via a task raised by another Hastoe staff member, the Customer Services Advisor should discuss with the resident or their representative the issue that they are dissatisfied with to fully understand what the complaint is about and what they would like as a resolution to the complaint.”</i></p> <p>Section 10.1 of the Complaints Procedure in relation to stage two complaints:</p> <p><i>“Although residents must not be required to explain their reasons for requesting an escalation to stage 2, the stage 2 complaint handler should contact the resident on receipt of the case to introduce themselves and try to establish why the resident remains dissatisfied following the stage 1 response”</i></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	Yes	The complaint is discussed with the resident at each stage prior to the acknowledgement letter being sent. A template letter is used at each stage	

	clarify any areas where this is not clear.		which details the areas of complaint (complaint definition).	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>deal with complaints on their merits, act independently, and have an open mind;</li> <li>give the resident a fair chance to set out their position;</li> <li>take measures to address any actual or perceived conflict of interest; and</li> <li>consider all relevant information and evidence carefully.</li> </ol>	Yes	<p>This is set out in section 8.3 of our Complaints policy:</p> <p><i>“At each stage of the complaints process, complaint handlers will:</i></p> <ul style="list-style-type: none"> <li><i>Deal with the complaint on its merits, act independently, and have an open mind.</i></li> <li><i>Give the complainant the opportunity to set out their position.</i></li> <li><i>Take measures to address any actual or perceived conflict of interest (which may include referring the complaint to an alternative complaint handler).”</i></li> </ul> <p><i>Section 9.8 and 9.10 of our Complaints Procedure:</i></p> <p><i>On receipt of the case in ActiveH the stage 1 complaint handler should contact the resident to introduce themselves and summarise what they will be investigating and what the resident has requested as an outcome following the acknowledgement letter sent by the Customer Services team. They should confirm with the resident if this is correct</i></p>	

			<p><i>and whether they have anything they wish to add to this.</i></p> <p><i>As part of the investigation, the stage 1 complaint handler may need to request additional evidence to support the resident's complaint. They should advise the resident on how to provide this evidence and when they will need this by to enable the complaint investigation and response to be made within the 10 working day deadline."</i></p>	
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	Our policy and procedure complies with the Complaint Handling Code. We have not had reason to extend complaint responses to date outside of the code timescales.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>Reasonable Adjustments are addressed in section 7.1 – 7.2 of our Complaints policy:</p> <p><i>"Reasonable adjustments will be made to accommodate a complainant's needs in accordance with the Equality Act 2010. This may include changes to the complaints policy, procedure or process.</i></p> <p><i>When investigating a complaint, the complaint handler will consider whether reasonable adjustments should have been made to policies, procedures or</i></p>	An additional data collection exercise outside of the complaints process is planned for 2024/25

		<p><i>processes relevant to the complaint to accommodate the needs of the complainant.”</i></p> <p>In addition, in section 4.1 of our Complaints procedure:</p> <p><i>“At all parts of our complaints process, those involved in logging, investigating and responding to complaints should consider whether reasonable adjustments are required either to this procedure or other policies and procedures to take into account any vulnerabilities presented by the complainant.”</i></p> <p>Section 9.3 of our Complaints procedure:</p> <p><i>“When discussing the complaint with the resident, the Customer Services Advisor, should try to establish whether the resident is vulnerable or at risk and their communication preferences with the complaint handler.”</i></p> <p>The ActiveH CRM system has the ability to record this data and we have information in relation to existing residents where this information has been disclosed.</p>	
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5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<p>Section 11.1 of our Complaints policy:  <i>"If the complainant remains dissatisfied following the stage one response then it must be escalated to stage two of the process."</i></p> <p>If we've accepted the complaint then we always allow for escalation to stage two.</p>	
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	<p>All complaints are logged on our ActiveH Housing Management system and documentation in relation to the case are saved to our document repository system, Liberty.</p> <p>Guidance on how to use the systems is provided to staff specifically in relation to complaints and saved to our intranet to ensure that all staff can access this.</p>	
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	<p>This is included in Section 13 of our Complaints policy:</p> <p><b><i>"Remedies</i></b>  <i>Where something has gone wrong we will acknowledge this and set out, as part of the complaint response, actions already taken or we intend to take to put things right. These may include:</i></p> <ul style="list-style-type: none"> <li>• <i>An apology</i></li> <li>• <i>Acknowledging where things have gone wrong</i></li> </ul>	

			<ul style="list-style-type: none"><li>• <i>Providing an explanation, assistance or reasons</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>Providing a financial remedy (this will be in accordance with our compensation policy)</i></li><li>• <i>Changing policies, procedures or practices</i></li></ul> <p><i>Any remedy offered will reflect the impact on the complainant as a result of any fault identified.</i></p> <p><i>The remedy offer will clearly set out what will happen and by when, in agreement with the complainant where this is appropriate. Any remedy proposed must be followed through to completion.</i></p> <p><i>When considering an appropriate remedy the complaint handler will take account of the guidance issued by the Housing Ombudsman:</i></p> <p><a href="https://www.housing-ombudsman.org.uk/landlords-info/guidance-notes/ombudsmans-policy-and-guidance-on-remedies/">https://www.housing-ombudsman.org.uk/landlords-info/guidance-notes/ombudsmans-policy-and-guidance-on-remedies/</a></p>	
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5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<p>We have an Acceptable Behaviour policy and procedure that is referenced in both the Complaints policy and procedure:</p> <p>Section 9 of our Complaints policy and section 5 of the Complaints procedure:</p> <p><b><i>“Acceptable Behaviour</i></b>  <i>From time to time a small minority of complainants may behave in a way that makes it difficult to effectively investigate their complaint and become overly time consuming to manage.</i>  <i>Staff handling complaints from residents or their representatives displaying unacceptable behaviours should refer to the Acceptable Behaviour policy. “</i></p>	
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	This is detailed in our Acceptable Behaviour policy and procedure, with a requirement to undertake a proportionality assessment as part of the procedure.	

## 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	<p>This is detailed in section 10.4 of our Complaints policy:</p> <p><i>“A full written response to the complaint should be made within 10 working days of the complaint being acknowledged. The complaint handler must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the complainant of the expected timescale of the 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.”</i></p> <p>Resident vulnerability is addressed in Section 9.3 of our Complaints procedure:</p> <p><i>“When discussing the complaint with the resident, the Customer Services Advisor, should try to establish whether the resident is vulnerable or at risk and their communication preferences with the complaint handler.”</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	Section 10.1 of our Complaints policy:  <i>“All complaints received will be raised as a stage one complaint. These will be logged and acknowledged within 5 working days of receipt. The acknowledgement will clearly detail what the complaint is about and what the complainant would like as an outcome to their complaint.”</i>	
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	This is detailed in section 10.4 of our Complaints policy:  <i>“A full written response to the complaint should be made within 10 working days of the complaint being acknowledged. The complaint handler must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the complainant of the expected timescale of the 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.”</i>	
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	Yes	Set out above	

	10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<p>Set out in section 10.5 of our policy:</p> <p><i>“When extending the timescale, the complainant must also be provided with the contact details for the Housing Ombudsman.”</i></p> <p>A template letter is provided to staff to ensure compliance with this.</p>	
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	<p>Set out in section 10.6 of our policy:</p> <p><i>“The response to the complaint must be provided to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issues are completed. Outstanding actions must be tracked be tracked by the complaint handler until all issues are resolved. The complaint handler must provide regular updates to the complainant.”</i></p> <p>Further detail in section 9.16 – 9.17 of our Complaints procedure:</p> <p><i>“Once the stage one response has been sent to the complainant, or their third party representative, any outstanding actions left to address the issues or service</i></p>	

			<p><i>improvements to be implemented must be detailed in the Incident tab in the complaint case in ActiveH. The incident tab must be kept updated by the stage one complaint handler for each contact made to the resident in relation to progress with these actions or other action the complaint handler has taken.</i></p> <p><i>The complaint must be left open and regularly monitored by the stage one complaint handler until all actions are completed. The stage one complaint handler must provide the resident with regular updates.”</i></p>	
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	<p>Set out in section 10.7 of our policy:</p> <p><i>“The complaint response must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice as appropriate.”</i></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 issued. Where the stage 1 response has been issued, the new issues are	Yes	<p>Set out in section 10.8 of our policy:</p> <p><i>“Where the complainant raises additional complaints during the investigation, these must be incorporated into the stage one response if they are related and the stage one response has not been issued. Where</i></p>	

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.		<i>the stage one 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.”</i>	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <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	Set out in section 10.9 of our policy:  <i>“The complaint response letter will be clear and contain the following information:</i> <ul style="list-style-type: none"> <li>• <i>The complaint stage</i></li> <li>• <i>The detail of the complaint and what the complainant requested as an outcome.</i></li> <li>• <i>The decision on the complaint</i></li> <li>• <i>The reasons for any decisions made</i></li> <li>• <i>The details of any remedy offered to put things right.</i></li> <li>• <i>Details of any outstanding actions and,</i></li> <li>• <i>Details of how to escalate the complaint to stage two if the complainant remains dissatisfied.”</i></li> </ul>	

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	Section 11.1 of the Complaints policy: <i>"If the complainant remains dissatisfied following the stage one response then it must be escalated to stage two of the process."</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	Section 11.2 of the Complaints policy: <i>"The stage two complaint must be acknowledged and logged within five working days of the request to escalate being received. The acknowledgement must be clear on what the complaint is in relation to and what the complainant is requesting as an outcome."</i>	
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.	Yes	Section 11.3 of the Complaints policy: <i>"The complainant is not required to explain their reasons for escalating the complaint, but the stage two complaint handler will try to contact the complainant to understand why they remain unhappy."</i>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 11.4 of the Complaints policy: <i>"The stage two complaint handler will ordinarily be the director responsible for the</i>	

			<p><i>service area complained about, but may be any Director of the organisation.”</i></p> <p>Directors do not deal with stage one complaints. In a situation where they do, or they’ve been involved in the complaint at stage one, then another director will investigate the complaint.</p>	
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	<p>Section 11.5 of the Complaints policy:</p> <p><i>“The stage two full response must be made within 20 working days of the complaint being acknowledged. The complaint handler must decide whether an extension to this timescale is needed when considering the complexity of the complaint then inform the complainant of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the complainant.”</i></p>	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	As above	

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	<p>Section 11.6 of the Complaints policy:</p> <p><i>“When extending the timescale, the complainant must also be provided with the contact details for the Housing Ombudsman”</i></p> <p>A template letter is provided to staff to ensure compliance with this.</p>	
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	<p>Section 11.7 of the Complaints policy:</p> <p><i>“The response to the complaint must be provided to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issues are completed. Outstanding actions must be tracked by the complaint handler until all issues are resolved. The complainant must be provided with appropriate updates.”</i></p> <p>Section 10.7 and 10.8 of the Complaints procedure provides further guidance:</p> <p><i>“Once the stage 2 response has been sent to the complainant, or their third party representative, any outstanding actions left to address the issues or service improvements to be implemented must be detailed in the Incident tab in the complaint case in ActiveH. The incident tab must be</i></p>	

			<p><i>kept updated by the stage two complaint handler for each contact made to the resident in relation to progress with these actions or other action the complaint handler has taken.</i></p> <p><i>The complaint must be left open and regularly monitored by the stage two complaint handler until all actions are completed. The stage two complaint handler must provide the resident with regular updates.”</i></p>	
6.18	<p>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.</p>	Yes	<p>Section 11.9 of the Complaints policy:</p> <p><i>“The complaint response letter will be clear and contain the following information:</i></p> <ul style="list-style-type: none"> <li>• <i>The complaint stage</i></li> <li>• <i>The detail of the complaint and what the complainant requested as an outcome.</i></li> <li>• <i>The decision on the complaint</i></li> <li>• <i>The reasons for any decisions made</i></li> <li>• <i>The details of any remedy offered to put things right.</i></li> <li>• <i>Details of any outstanding actions and,</i></li> <li>• <i>Details of how to escalate the complaint to the Housing Ombudsman if the complainant remains dissatisfied.”</i></li> </ul>	



6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	As above	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 complaints are handled by directors, so will include other staff as and when necessary.	

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising;	Yes	Section 13.1 of the Complaints policy: <i>Where something has gone wrong we will acknowledge this and set out, as part of the complaint response, actions already taken</i>	

	<ul style="list-style-type: none"> <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>		<p><i>or we intend to take to put things right. These may include:</i></p> <ul style="list-style-type: none"> <li>• <i>An apology</i></li> <li>• <i>Acknowledging where things have gone wrong</i></li> <li>• <i>Providing an explanation, assistance or reasons</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>Providing a financial remedy (this will be in accordance with our compensation policy)</i></li> <li>• <i>Changing policies, procedures or practices</i></li> </ul>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Section 13.2 of the Complaints policy:</p> <p><i>Any remedy offered will reflect the impact on the complainant as a result of any fault identified.</i></p>	
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	<p>Section 13.3 of the Complaints policy:</p> <p><i>The remedy offer will clearly set out what will happen and by when, in agreement with the complainant where this is appropriate. Any remedy proposed must be followed through to completion.</i></p>	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 13.4 of the Complaints policy:  <i>When considering an appropriate remedy the complaint handler will take account of the guidance issued by the Housing Ombudsman:</i>  <a href="https://www.housing-ombudsman.org.uk/landlords-info/guidance-notes/ombudsmans-policy-and-guidance-on-remedies/">https://www.housing-ombudsman.org.uk/landlords-info/guidance-notes/ombudsmans-policy-and-guidance-on-remedies/</a>	
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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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<p>Section 14.1 of the Complaints policy:</p> <p><i>A report of complaints performance and service improvements will be produced on an annual basis and reported to the Board. This report will include:</i></p> <ul style="list-style-type: none"> <li>• <i>The annual self-assessment against the Housing Ombudsman Complaint Handling Code.</i></li> <li>• <i>A quantitative and qualitative analysis of our complaint handling performance, including a summary of the types of complaints we have refused to accept.</i></li> <li>• <i>Any findings of non-compliance with the Complaint Handling Code made by the Housing Ombudsman.</i></li> <li>• <i>Service improvements made as a result of complaints.</i></li> <li>• <i>Any annual report about our performance from the Ombudsman.</i></li> <li>• <i>Any other relevant reports or publications produced by the Ombudsman in relation to our work.</i></li> </ul>	

			This is due to be reported to the Hastoe Board in June 2024.	
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	As above, and per section 14.2 of the Complaints policy:  <i>This report will also be published on the complaints section of our website alongside the Board's response to the report.</i>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	As per section 14.3 of the Complaints policy:  <i>A self-assessment against the complaint handling code will also be carried out following any significant restructure, merger and/or change in procedures.</i>  This isn't currently applicable for Hastoe.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Not currently applicable, but it will be reviewed should the HOS request this.	
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	This hasn't been applicable to date, but will be complied with should the need arise.	



## 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	<p>Section 1.1 of the Complaints policy: <i>This policy is designed to effectively manage complaints about Hastoe's services with a focus on learning lessons and improving services. Complaints are a core Hastoe service.</i></p> <p>Service improvements and lessons learned are also recorded on our systems and reporting in place to enable monitoring.</p>	
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	<p>As above and section 6.4 of the Complaints policy: <i>A member of the Board will have lead responsibility for complaints to support a positive complaint handling culture. This person(s) will be referred to as the Member Responsible for Complaints (MRC).</i></p> <p>Service improvements following complaints are also discussed at relevant meetings with employees to promote the importance of resident complaints.</p>	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<p>Learning from complaints is contained within resident newsletters: <a href="https://www.hastoe.com/improvements/">https://www.hastoe.com/improvements/</a> The annual residents' report: <a href="https://www.hastoe.com/about-us/performance/annual-report-to-tenants/">https://www.hastoe.com/about-us/performance/annual-report-to-tenants/</a></p> <p>We hold bi annual resident complaint scrutiny sessions, with the next one scheduled for 16 April 24.</p>	

			<p>Learning from complaints is discussed with staff at relevant meetings, and complaints performance is a KPI reported to the Board.</p> <p>In 2023 the Board formed a task and finish group to review complaint handling and recommendations were made which are being implemented as part of our Business strategy.</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	<p>This is the Housing Director as set out in section 6.3 of the Complaints policy:</p> <p><i>The Housing Director is accountable for complaint handling and will assess themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.</i></p>	
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	<p>Two Board members have been appointed by the Board to take on this role in March 2024. This is set out in sections 6.4 and 14.4 of the Complaints policy:</p> <p><i>A member of the Board will have lead responsibility for complaints to support a positive complaint handling culture. This person(s) will be referred to as the Member Responsible for Complaints (MRC).</i></p> <p>The job description of the MRC requires attendance to at least one staff event per annum to promote the importance of complaints.</p>	



9.6	<p>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.</p>	Yes	<p>This is contained within the Job Description of the MRC and is contained in section 14.4 of the Complaints policy:</p> <p><i>The Member Responsible for Complaints (MRC) and the Board will receive:</i></p> <ul style="list-style-type: none"> <li>• <i>Regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</i></li> <li>• <i>Regular reviews of issues and trends arising from complaint handling</i></li> <li>• <i>Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings, and</i></li> <li>• <i>The annual complaints performance and service improvement report.</i></li> </ul>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in</li> </ol>	Yes	As above	

	<p>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>The following objective will be added to all relevant employees objectives as part of the 2024 appraisal process:</p> <p><i>Complaints must be handled in accordance with the Complaints policy and procedure, ensuring that you:</i></p> <ul style="list-style-type: none"> <li>• <i>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</i></li> <li>• <i>take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</i></li> <li>• <i>act within the professional standards for engaging with complaints as set by any relevant professional body.</i></li> </ul>	