Housing Ombudsman Complaint Handling Code: Self-assessment form.

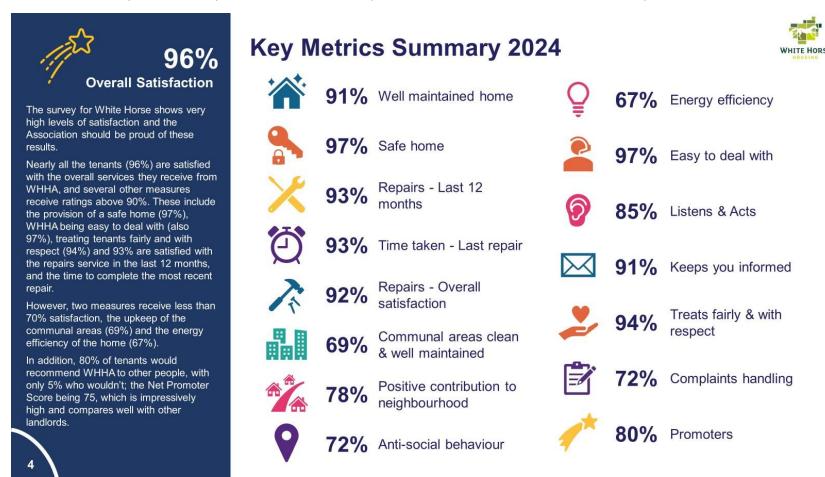
In April 2024, the Housing Ombudsman published a new Complaints Handling Code. The code is now a statutory requirement for all social landlords. The purpose of the Code is to enable landlords to resolve complaints raised by their residents quickly and to use the learning from complaints to drive service improvements. It will also help to create a positive complaint handling culture amongst staff and residents.

White Horse Housing has always had a positive approach to complaints, underpinned by a robust Complaints Policy and high quality customer service standards. We are proud of our successes in resolving complaints quickly and taking measures, where possible and practical, to ensure further service failures in that area does not occur again. We monitor all complaints we receive and report the overall headlines to our Board every quarter. We also provide the Board and Resident's Scrutiny Panel with an annual report setting out the number of complaints dealt with during the previous financial year, the complaint type and reason, our response and resolution and any learning points taken from the process. A copy of the 2024-25 complaints log – as presented, is set out below:

Complaint number	Scheme The Merchants, Luckington.	Refers To Contractor	Reason Tenant dissatisfied with work to change the immersion heater carried out by 3 Solutions Ltd.	28/05/2024	Internal Owner Maintenance Manager	Resolution Date Target	Complainant	Resolved Date and Time	Stage	Days To Resolve	Upheld Yes	How Resolved DS contacted 3Solutions Director and requested an investigation. Following this he wrote to the tenant, upheld the complaint and apologised.	Learning Outcomes Better communication is needed between our Contractors Operatives.
2025000001	The Gardens, Rushall.	Department	Tenant wanted to have a tree felled but this was objected to by other residents. DS cancelled the felling of the tree and tenant was dissatisfied with communication from repairs and maintenance team when dealing with the matter and objected to the tree overhanging his parking space.	05/02/2025	Operations Director	18/02/2025	N/A	14/02/2025	1	8	No	Operations Director liaises with DS to gain information. Satisfied that tenant was sent letters when dealing with the matter and had opportunities to give feedback. Letter to tenant and tree inspection report included with the letter. Tree was not felled but was cut back.	Ensure scheme wide consultation is given before raising orders to fell trees.

The new Complaint Handling Code requires all landlords to undertake a self-assessment of their current policy and procedure and make any adjustments necessary to ensure full compliance is achieved. A copy of the self-assessment for White Horse Housing is attached below. Whilst some minor amendments were needed to our existing procedures, we are pleased to say that our existing policy was both comprehensive and robust and met the majority of the new requirements.

The 2023-24 Tenant Satisfaction Measure results are also set out below. They demonstrate the Association enjoys high levels of tenant satisfaction, including how it handles complaints, the way it treats tenants with respect, listens and acts on their views and is easy to deal with.



A copy of the Association's Complaints Leaflet is available on our website – <u>www.whitehorsehousing.co.uk</u> and a full copy of the Complaints Policy is available on request.

Steve Warran, Chief Executive.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Complaints Policy	Complaints Policy reviewed and approved by the Board in May 2024
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.	No	Complaints Policy	Any expression of dis-satisfaction, (e.g. through our surveys etc.), is followed up by a member of staff to understand what the issue is (or was), if it has been resolved OR if it needs to be escalated as a complaint for further investigation.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy	Complaints handling Code flow charts included within the complaints policy for future reference.

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	Complaints Policy	All complaints/actions/and learning points are logged on the Home master system.
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		Any expression of dis-satisfaction, (e.g. through our surveys etc.), is followed up by a member of staff to understand what the issue is (or was), if it has been resolved OR if it needs to be escalated as a complaint for further investigation.

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	Exclusions are listed within the Complaints policy	Exclusions embrace the Ombudsman's Complaints Handling Code
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy.	Yes	As above	As above

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	As above	As above
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 would be done verbally and followed up in writing.	These circumstances would be rare as we wish to use any issues raised as learning points to influence future service provision.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy	This would not happen. All complaints/enquiries/service failures are taken seriously and dealt with quickly.

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	Complaints policy	Complaints can be received through a wide variety of channels, including through third parties.
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	Staff 1-2-1's/training logs	Staff training given
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	Annual complaints report to Board/tenants	As above, we use any issues raised as a future learning point.

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	Complaints leaflets available. Full policy available on request or through the web-site.	Complaints information included on the website and the tenants portal.
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	Complaints Policy	
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	Complaints Policy	Third party complaints and assistance for residents is welcomed.
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	Complaints Policy	Within the available information

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	Operations Director takes the lead on complaints.	
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	Staffing Structure	Operations Director is a senior member of the team and has access to all staff, files and IT systems.
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 1-2-1's/training logs	Operations Director oversees all complaints and ensures they are logged, tracked and responded to within the timescales prescribed.

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	Complaints Policy	No one is discriminated against.
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	Complaints Policy	We aim to resolve all issues at the first point of contact OR at Stage 1 of the complaints process.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints Policy	Two stage process now in place.
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	Complaints Policy	We do not use third parties to resolve complaints. We take responsibility for them ourselves.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy	See 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	Complaints Policy sets out how this is achieved.	We always try to understand the root cause of the issue and what the complaint is actually about otherwise it can never be addressed.
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	Complaints Policy	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Complaints Policy	All tenants are treated with fairness and respect. We will "go the extra mile" to resolve any issued raised and ensure the tenants is satisfied with the outcome.

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	Complaints Policy	Should an extension of time be required we always agree this with the complainant first.
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	Equality and Diversity Policy	We use a range of measures to ensure full accessibility to our services, including making a complaint.
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	Complaints Policy	
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	Yes	Complaints Policy	All complaints are logged and tracked on our Home Master IT system. This includes outcomes and learning points.

	any relevant supporting documentation such as reports or surveys.			
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	Complaints Policy	It is in our, and the tenants, interest to resolve any issues as quickly as possible. We got 96% overall satisfaction and a 75 Net Promoter Score in our 2023/24 TSM survey.
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	Anti-Social Behaviour Policy and procedure in place.	
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	Complaints Policy.	

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	Complaints Policy	It is in our, and the tenants, interest to resolve any issues as quickly as possible. Almost all complaints are resolved at Stage 1. We got 96% overall satisfaction and a 75 Net Promoter Score in our 2023/24 TSM survey.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaints Policy	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints Policy	
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	Yes	Complaints Policy	

	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	Complaints Policy	Extensions are mutually agreed and reason for them are always provided.
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	Complaints Log	Logged on Home Master
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	Complaints Policy	We always seek to address all issues raised, but, in particular, the core issue behind the complaint.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would	Yes	Complaints Policy	We always seek to address all issues raised, but, in particular, the core issue behind the complaint.

	unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Complaint response letters	

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	Complaint response letters	

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	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.	Yes	Complaints Policy	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints Policy	
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	Complaints Policy	Extensions are mutually agreed and reason for them are always provided.
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	Complaints Policy	

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		
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		
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	Complaint response letters	

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		CEO does all Stage 2 complaint investigations.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	 Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 	Yes	Complaints response letters – compensation payments as set out in the complaints policy.	We always take responsibility where things go wrong and ensure am appropriate response is provided.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We always take responsibility where things go wrong and ensure an appropriate response is provided.
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	We always take responsibility where things go wrong and ensure an appropriate response is provided.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We always take responsibility where things go wrong and ensure an appropriate response is provided.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. g.	Yes	Self -Assessment is published on our website. Annual complaints report to the Board (May each year). Complaints, performance and survey results are scrutinised by the Tenant's Scrutiny Panel and recommendations made. Annual Review and Annual Report to Tenants' include a complaints report. New Complaints web-page created.	

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.		Self -Assessment is published on our website. Annual complaints report to the Board (May each year). Complaints, performance and survey results are scrutinised by the Tenant's Scrutiny Panel and recommendations made. Annual Review and Annual Report to Tenants' include a complaints	
			report.	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes		Unlikely to happen at WHHA given our small size.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We would always act on external advice where policy needs to be improved.
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		We believe we can comply with the code fully.

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	Learning points are logged, reported and acted on.	
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	Staff training and coaching.	
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	Self -Assessment is published on our website. Annual complaints report to the Board and the Resident's Scrutiny Pane. Annual Review and Annual Report to Tenants' include a complaints report.	
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	The Operations Director is the named Complaints Officer	

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	Complaints Policy. Lead Board member is the Chair of the Board.	
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	Reports provided as described above.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Reports provided as described above.	

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes		Once again, it is in our interest to take all complaints seriously, investigate them thoroughly and seek to resolve them as quickly as possible.
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