

Housing Ombudsman Handling Code - Self-Assessment Action plan 2024

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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	<p>Review training offer to colleagues handling complaints.</p> <p>Design and deliver training sessions in conjunction with Service Leads to raise awareness and increase knowledge.</p> <p>Review training offer for new starters. We need to ensure all colleagues that deal with complaints are trained on this aspect of the stage of complaints and understand how to respond and record these.</p> <p>Review and update policies and procedures where changes are required</p>	<p>September 2024</p> <p>September 2024</p> <p>August 2024</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with	Yes	Introduce a regular review and audit of complaints to check that	September 2024

	<p>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>		<p>cases are being correctly registered and managed through the process</p> <p>Update and include in training resources & communications.</p>	<p>September 2024</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>	<p>Yes</p>	<p>Review data as part of annual performance report</p>	<p>June 2025</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Need to include in training plan	September 2024

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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.		<p>Review housing new staff induction as part of training review</p> <p>Create a communications and engagement plan for complaints handling to raise awareness across teams</p>	<p>September 2024</p> <p>August 2024</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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	Review training needs and role	September 2024
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		Review training offer for staff Introduce collaborative meetings to share learnings from complaints across teams, monitor performance and share good practice	September 2024 July 2024

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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 need a robust way to record service requests -review use of Pentana to correctly capture these consistently or agree another in system option to record and report on these.	September 2024
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	We need to have a procedure with our third-party contractors on complaint handling Training needed for staff and contractors -If complaint around repairs, quality, attendance & workmanship sent back to contractor first instance sent back to contractor to reattend. Not recording or capturing this within an existing system. No operational procedures for this – update in repairs & maintenance policy and Contractor Code of Conduct. Contract management issues and resource constraints. Gap around contractors	September 2024

			feedback to assist with effective handling – feed into repairs service redesign	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		Repairs hub to communicate with contractor directly – Contractors are sitting within the repairs hub two days a week which has been implemented to drive up service improvements around repairs. Review procedures & training around this to include information for contractors. Review what is included within procurement process for repairs service as part of re-design work underway.	September 2024 December 2024
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	Review and roll out complaints training. Review learning from complaints and share across teams. Introduce a complaints case review process.	September 2024
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with	Yes	Review and roll out complaints training.	September 2024

	the resident suitable intervals for keeping them informed about their complaint.			
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.		Need to review how we are capturing where reasonable adjustments have been made as part of handling complaints – training & procedures to be reviewed.	September 2024
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	Review and update procedure around this. Training for staff to get consistency around record keeping. Review systems and tools to help colleagues record and view information on complaints.	August 2024 September 2024 Ongoing
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.		Include in refreshed training offer	September 2024
5.14	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard		Persistent complaints policy being reviewed. Need to share updates	August 2024

	for the provisions of the Equality Act 2010.			
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	Review and update policy and procedures around this	August 2024

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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>Further awareness and guidance on the complaint handling code to staff responding to complaints to be added to communication and engagement plan for housing.</p> <p>Training to be reviewed and rolled out to staff</p> <p>Review systems and tools for staff to record contact with resident as part of complaint handling.</p>	<p>September 2024</p> <p>September & ongoing as part of staff induction</p> <p>December 2024</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	Introduce a complaints handling review regime to sample check responses.	October 2024

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 unreasonably delay the response, the new issues must be logged as a new complaint.	No	Staff training / awareness sessions	September 2024
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	Introduce a complaints handling review regime to sample check responses	October 2024

Stage 2

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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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 awareness and training for staff.	September 2024
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Change the response to stage 2 from 10 to 20 days if decision to adopt this corporately has been made.	August 2024
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	Introduce a complaints handling review regime to sample check responses.	October 2024
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	Include approach to tracking outstanding actions and communication with resident in refreshed training.	September 2024
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	Introduce a complaints handling review regime to sample check responses.	October 2024
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;	Yes	Introduce a complaints handling review regime to sample check responses.	October 2024

	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.			
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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: <ul style="list-style-type: none"> • 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; 	Yes	Introduce a complaints handling review regime to sample check responses. Staff training / awareness sessions to be rolled out.	October 2024 September 2024

	<ul style="list-style-type: none"> Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 			
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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>	Yes	<p>Develop an annual complaints performance and service improvement report which is clear and accessible for all</p> <p>Work with TACT and other groups to co design and review the report</p> <p>Review the triangulation of our data in our performance reporting</p> <p>Work collaboratively with teams and residents to carry out a qualitative and quantitative analysis of complaints performance data and resident feedback</p>	<p>January 2025</p> <p>January 2025</p> <p>January 2025</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>			
8.2	<p>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.</p>		<p>Share annual report with TACT board once new group are formulated</p> <p>Publish the Governing Body's response to the report on the website (post election)</p>	<p>September 2024</p> <p>August 2024</p>
8.5	<p>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.</p>	Yes	<p>Add to complaints procedure. Check if this is in the emergency planning guidance</p>	<p>August 2024</p>

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Improvement plan	Action by date
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	Review lessons learnt log to help identify areas for service improvements Standing agenda item on complaints meeting to discuss lessons learnt	September 2024 & ongoing as part of continuous improvement July 2024
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	Analyse all complaints to see if there are any themes or trends	October 2024
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	Agree how complaints performance and lessons learnt will be scrutinised by residents through TACT and consumer standards focus groups Agree with Operational managers how learning from complaints will be shared across teams	September 2024 September 2024
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for	No	Appoint a Governing body member to take the lead role as MRC and agreed at the next	September 2024

	complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').		Cabinet committee housing meeting post election period.	
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: <ul style="list-style-type: none"> a. have a collaborative and co-operative 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	<p>Need a universally agreed objective in place.</p> <p>Agree communications and messaging around this with teams.</p>	September 2024