

## Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

### Section 1 - Definition of a complaint

#### Mandatory ‘must’ requirements

| Code section | Code requirement                                                                                                                                                                                                                                                               | Comply: Yes/No | Evidence, commentary and any explanations                                                                                           |
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| 1.2          | A complaint must be defined as:<br><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i> | Yes            | In our complaints policy on our website, we include this within section 3.1. The link to this can be located <a href="#">here</a> . |
| 1.3          | The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.                                                    | Yes            | We review each expression of dissatisfaction on its own merits irrespective of whether the resident uses the word “complaint”.      |
| 1.6          | ... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.                                                                                                                                            | Yes            | This is also included in our complaints policy under sections 3.1 and 3.3.1The link to this can be located <a href="#">here</a> .   |
| 1.7          | A landlord must accept a complaint unless there is a valid reason not to do so.                                                                                                                                                                                                | Yes            | We will not refuse a complaint unless it is within the list of exclusions. The list of exclusion is under section 3.3.              |

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| 1.8 | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.                                                                         | Yes | See section 3.3                                                                                                                                                                                            |
| 1.9 | If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. | Yes | A full explanation as to why a complaint has been refused would be provided to resident along with Ombudsman referral rights.<br><br>The refusal will also be logged on CHUB to ensure a good audit trail. |

### Best practice 'should' requirements

| Code section | Code requirement                                                                                                                                                                                                                                    | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                      |
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| 1.4          | Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received. | Yes            | Section 3.2 of complaints policy document. We are very clear on the distinct difference in what is to be considered a complaint.<br><br>The link to this can be located <a href="#">here</a> . |
| 1.5          | Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.                   | Yes            | Tenant Satisfaction Measures were introduced in October 2022, been collected for SNG and will be published in accordance with requirements from April 2024.                                    |

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                      | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                           |
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| 2.1          | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes            | We accept all these channels. In addition, residents can use social media (twitter/Facebook etc).<br><br>Also included in our complaints policy section 3.5. The link to this can be located <a href="#">here</a> .                                                                                 |
| 2.3          | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.                                                                                                                                                                            | Yes            | Our Complaints, Compensation and Habitual Complainants Policy Documents are all visible to the public via our Website and upon request we will issue a copy if required.<br><br>We can also provide large print or translate the policies upon request.                                             |
| 2.4          | Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.                                                                                                                                                                                                                                        | Yes            | On our Website we have a section ' <i>complaints and compliments</i> ' which provides the relevant links to our policies and how to raise a complaint.                                                                                                                                              |
| 2.5          | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.     | Yes            | Included in section 9 of our complaints policy.<br><br>The link to this can be located <a href="#">here</a> .                                                                                                                                                                                       |
| 2.6          | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.                                                                                                                                                                              | Yes            | We publicise our Complaint Policy and Handling Code self-cert on our website and by way of our S1/S2 responses. We also engage with residents via quarterly Resident Panel meetings to discuss hot topics.<br><br>We also highlight in newsletters and the collation of TSM data (see section 1.5). |

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| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.                                                                        | Yes | <p>We actively encourage residents to contact the Ombudsman for guidance on matters. We provide contact details for doing this.</p> <p>We also ensure that residents are correctly provided with Ombudsman referral rights at Stage 2 of the complaint process or if we refuse to log a complaint.</p>                                                                                                                              |
| 2.8 | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted. | Yes | <p>As referred above, we encourage residents to contact the Ombudsman to seek guidance on their rights at all stages. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• Refusing a complaint</li> <li>• How far back we will investigate a complaint</li> <li>• Timeframes to respond to a complaint</li> <li>• Level of compensation awarded</li> <li>• Decision/Outcome of a complaint</li> </ul> |

### Best practice 'should' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                                               | Comply: Yes/No | Evidence, commentary and any explanations                                                                                  |
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| 2.2          | Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes            | <p>As detailed in complaints policy section 3.5 and 3.5.1</p> <p>The link to this can be located <a href="#">here</a>.</p> |

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                              | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                   |
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| 3.1          | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer". | Yes            | There are trained individuals/managers who deal with complaints in low complaint volume areas.<br><br>In areas which attract a high volume (such as repairs) we have specialised complaints officers who are supported by a central complaints team who are responsible for allocation, escalations and complex cases. See section 3.9 of complaints policy |
| 3.2          | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.                                                                                                                                                              | yes            | As detailed in section 3.10 of complaints policy.                                                                                                                                                                                                                                                                                                           |

### Best practice 'should' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                  | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 3.3          | Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul> | Yes            | <p>Through the use of Gober training which is embedded in our culture. All complaints are reviewed by a manager, but complaints officers do have authority to, for example raise repairs or liaise with other staff members/contractors to ensure quick resolutions.</p> <p>All those investigating and responding to complaints has had on the job training.</p> <p>We are also in the process of putting together compulsory complaints training for all new and existing staff (To start roll out in Jan 24). We are also looking at if we can introduce e-learning modules for complaint handling.</p> |

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Comply:<br>Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                               |
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| 4.1          | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt.</b> | Yes               | We operate a 2-stage process in line with Ombudsman guidance. All complaints are recorded on CHUB and acknowledged within 5 working days.<br><br>We will either log a complaint or refuse one (explaining why). We do not look to resolve at "stage 0". |

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| 4.2 | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.                                                                                                                                                                                   | Yes | Our Stage 1 acknowledgement letter is complainant with this. It summarises the complaint points and confirms the date by which a response is due. As part of the Stage 1 investigation, we ask what resolution the resident is seeking and clarify any ambiguity/questions over the complaint points/issues.                                                                                                                       |
| 4.6 | A complaint investigation must be conducted in an impartial manner.                                                                                                                                                                                                                                                                                                                                                                                                        | Yes | <p>This is why we have dedicated complaint handlers who are training to look into matters impartially and consider issues from the residents point of view.</p> <p>Additionally, as detailed in the Complaints Policy we would never ask a staff member to look into a complaint about themselves – this would be done either by a manager or complaints officer.</p> <p>The link to this can be located <a href="#">here</a>.</p> |
| 4.7 | <p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul> | Yes | We are complainant with this in line with the comments above (4.6)                                                                                                                                                                                                                                                                                                                                                                 |



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| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication                                                                                                                                                                                                                                      | Yes | <p>Our acknowledgements at S1/S2 give timescales for responses. The method of communication is generally decided by the resident, and we will follow this to make sure the resident is being communicated with using the method they are most comfortable with.</p> <p>We will also consider and potentially agree to certain level of contact and method of communication on a case-by-case basis.</p>                                                                                                                                                                                                                                                                                                                                     |
| 4.12 | <p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>                                                                          | Yes | Any complaint investigation is impartial, and all parties involved in a complaint (resident or staff) will be given the opportunity to discuss the complaint, air their side of events and what they considered happened, leading to the complaint being logged and any actions to be taken forward (if applicable).                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint                                                                                                                                                                                                                                               | Yes | <p>Complaint's policy section 3.8</p> <p>The link to this can be located <a href="#">here</a>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4.14 | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint. | Yes | <p>We would not escalate a complaint from Stage 1 to Stage 2 for the following reasons:</p> <p>Insufficient information was provided as part of the escalation request. In order for us to proceed we need to understand why the resident remains dissatisfied with the Stage 1 response and how they would like us to resolve the issue(s).</p> <p>The concerns/issues raised by the resident at the escalation stage did not form part of the original complaint and as such have not been investigated at Stage 1. (A new Stage 1 complaint would be logged for this).</p> <p>In any event a full explanation for opting not to escalate a complaint to Stage 2 would be provided to resident, along with Ombudsman referral rights.</p> |

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| 4.15 | A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared. | Yes | This is all recorded on CHUB as it is an audit requirement that all communications about the complaint are stored here.                                                             |
| 4.18 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.                                                                                                      | Yes | Section 6 of complaints policy and also within the Habitual Complainants policy which is also accessible on our website.<br><br>Both policies can be located <a href="#">here</a> . |

### Best practice 'should' requirements

| Code section | Code requirement                                                                                                                    | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 4.3          | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes            | <p>We always tried to do this and is one of the reasons why we made the decision to publish our Compensation Policy document on our website.</p> <p>As part of Stage 1/S2 investigations we also seek to understand what resolution the resident is seeking and will have any necessary discussions to ensure we manage resident expectations.</p> <p>An example of this is a missed repair appointment. Residents may feel they are entitled a payment equal to a day's loss of earnings. However, our Complaints and Compensation policies explain that a standard award of £30 is to be provided in the event of a missed appointment.</p> |

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| 4.4 | A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required. | Yes | <p>All teams are aware of the need to act swiftly and resolve an issue/complaint at the earliest opportunity possible. Any decision needs to be based on sound theory and rationale.</p> <p>A typical situation for this would be a missed appointment where the £30 can be offered without the need for a full complaint response. This is something that can be checked by our customer facing teams (typically our contact centre) quickly and gives the resident a quick resolution to the issue.</p> |
| 4.5 | Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.                                  | Yes | <p>All residents can ask someone to act on their behalf as long as we have the correct permissions in place allowing us to discuss matters with said 3<sup>rd</sup> party.</p> <p>Typically, this would be done by way of completing a Representative Consent Form (below) but can also be completed over the telephone if the account holder (our resident) is present. (This is usually a temporary measure).</p> <p><a href="#">Representative Consent Form (office.com)</a></p>                       |
| 4.8 | Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.                                                                                  | Yes | As referred if there are any issues linked to legal obligations (usually referred in Tenancy Agreement) we would seek advise from our legal, LH and Neighbourhood teams to ensure we are clear on our obligations, which we would then clearly set out to the resident.                                                                                                                                                                                                                                   |

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| 4.9  | Communication with the resident should not generally identify individual members of staff or contractors.                                                                                                                                 | Yes | <p>We will only typically refer to staff/contract members if the resident has bought someone to our attention and considered part of the complaint to be investigated.</p> <p>We may refer to the decision makers within SNG if needed to demonstrate that the appropriate person has been involved in discussions/investigations and made said decision.</p>                                                                                                                                                            |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation.                                                                                                                                                | Yes | We ensure we do this at all stages possible. This would also include post complaint stage, where we have agreed to follow up and progress an issue through to completion/resolution.                                                                                                                                                                                                                                                                                                                                     |
| 4.16 | Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.                                                               | Yes | Tenant Satisfaction Measures were introduced in October 2022, been collected for SNG and will be published in accordance with requirements from April 2024.                                                                                                                                                                                                                                                                                                                                                              |
| 4.17 | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained. | Yes | <p>We agree and acting to change the complaints culture at SNG. All complaints raised should lead to a learning that can be taken forward. This will ensure that service delivery improves.</p> <p>We also hold quarterly Ombudsman Determination review meetings in which errors at ground level are openly discussed, alongside learnings highlighted by the Ombudsman to be implemented to bring about meaningful change. This is attended by those involved with the underlying complaint and senior management.</p> |

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| 4.19 | Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010. | Yes | This is detailed within sections 2, 4 and 11 of our Habitual Complaints policy located <a href="#">here</a> . |
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## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

| Code section | Code requirement                                                                                                                                                                                                                                                                                                   | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 5.1          | Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes            | <p>We expect that only in rare instances should a complaint response be sent outside of 10 working days.</p> <p><b>SNG</b> 90% 1,427 out of 1,587 on time</p> <p><b>SW9</b> 73% 59 out of 81 on time</p> <p>To reinforce this, a weekly email is sent to all who have open complaints reminding them of what is due/overdue each week.</p> <p>In the event we do breach the 10 working day timeframe we will contact the resident to agree a revised timeframe, not exceeding a further 10 working days.</p> |
| 5.5          | A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.                    | Yes            | We comply with this to ensure that the resident has an answer/outcome to their complaint as early as possible. This would include where we have agreed actions yet to be completed but would resolve the                                                                                                                                                                                                                                                                                                     |

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| <p><b>5.6</b></p> | <p>Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>                                                                                                                                                                                                                                                                                                                                      | <p>Yes</p> | <p>We are compliant with this. Both Stage 1 and Stage 2 responses are designed to make sure we clearly set out the concerns a resident has raised, our investigation, findings and decision/outcome. Decisions/outcomes should be based on evidence identified in the investigation and explained to the complainant accordingly.</p> <p>If we are to award compensation, we would expect some rationale to explain why.</p> <p>Any outstanding actions to be taken forward are clearly documented along with details over who is responsible to completing said actions.</p>                                                                                                                                                                                      |
| <p><b>5.8</b></p> | <p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul> | <p>Yes</p> | <p>We are compliant with this. As referred above both Stage 1 and Stage 2 responses are designed to make sure we clearly set out the concerns a resident has raised, our investigation, findings and decision/outcome. Decisions/outcomes should be based on evidence identified in the investigation and explained to the complainant accordingly.</p> <p>If we are to award compensation, we would expect some rationale to explain why.</p> <p>Any outstanding actions to be taken forward are clearly documented along with details over who is responsible to completing said actions.</p> <p>We also ensure that referral rights are provided accordingly. (At S1, S2 escalation rights are provided and at S2, Ombudsman referral rights are provided).</p> |

## Stage 2

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                       | Comply:<br>Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                             |
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| 5.9          | If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision. | Yes               | <p>We do not decline an escalation unless the reason for this is a new issue or an exclusion under our complaints policy – although this would most likely have been excluded at stage 1.</p> <p>Ombudsman contact details are offered at this stage.</p> <p>Please also see section 4.14, above.</p> |
| 5.10         | On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.                                                                                                                          | Yes               | <p>As referred above we will always look to do this at the point of acknowledging the escalation request and when investigating the issues raised.</p> <p>We will always look to clarify any issues that are not clear.</p>                                                                           |
| 5.11         | Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.                                                                                                                                                                                                                                                                                              | Yes               | <p>We are compliant with this.</p> <p>On occasion we receive request from residents to log/escalate stage 2 complaint before a Stage 1 has been logged. We explain the process and log a stage 1 as appropriate.</p>                                                                                  |

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| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes | <p>This is confirmed within our Complaints Policy and ensures that there is a degree of separation and a fresh pair of eyes investigating the complaint.</p> <p>The link to this can be located <a href="#">here</a>.</p>                                                                                                                                                                                                                                                                                                                                                        |
| 5.13 | Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.                                                                                                                                                                                                                                                                                                                                                                                                                | Yes | <p>The vast majority meet this expectation.</p> <p>The % of S2 responses issued on time between 01/11/22 – 31/10/23.</p> <p>SNG <b>96%</b> 384 out of 401 on time<br/>SW9 <b>85%</b> 22 out of 26 on time</p> <p>All response timeframes are monitored and reported in our quarterly reports which are shared on our website for complete transparency.</p> <p>If a response is to be issued late, we will inform the resident with a revised timeframe. This will not exceed 10 working days unless absolutely necessary and unavoidable (we will explain why to resident).</p> |
| 5.16 | <p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident</li> </ul> | Yes | <p>We are compliant with this. As referred above both Stage 1 and Stage 2 responses are designed to make sure we clearly set out the concerns a resident has raised, our investigation, findings, and decision/outcome. Decisions/outcomes should be based on evidence identified in the investigation and explained to the complainant accordingly.</p> <p>If we are to award compensation, we would expect some rationale to explain why.</p> <p>Any outstanding actions to be taken</p>                                                                                       |



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|  | remains dissatisfied. |  | forward are clearly documented along with details over who is responsible to completing said actions.<br><br>We also ensure that referral rights are provided accordingly. We do not operate a Stage 3 complaints process. |
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### Stage 3

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes/No | Evidence, commentary and any explanations                       |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------|
| 5.17         | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances. | Yes            | We have operated a 2 stage complaints process since April 2019. |

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |                                                |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|------------------------------------------------|
| 5.20 | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul> | N/A | We don't operate a Stage 3 complaints process. |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|------------------------------------------------|

## Best practice 'should' requirements

### Stage 1

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                  | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                      |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.2          | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.                                                                                                                                                                                               | Yes            | We will always seek a residents approval to look at a complaint if it likely to go beyond 20 works days, but if approval is not agreed the resident is provided with Ombudsman referral rights.                                                                                                                                                                                                |
| 5.3          | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.                                                                                            | Yes            | Please see above (5.2)                                                                                                                                                                                                                                                                                                                                                                         |
| 5.4          | Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.                                                                                                                                                        | Yes            | <p>Although our complaints policy says we will only investigate a 6-month history, we have rewritten our Complaints Policy to empower complaints officers to investigate as far back as they deem necessary. This would include older reports linked to the issue(s) of concern.</p> <p>All involved as aware that they should seek guidance from the Central Complaints Team if needs be.</p> |
| 5.7          | Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. | Yes            | We are compliant with this as explained in section 4.14.                                                                                                                                                                                                                                                                                                                                       |

## Stage 2

| Code section | Code requirement                                                                                                                                                                                                                                      | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                         |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.14         | If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.                                                                                                   | Yes            | We will always seek a residents approval to look at a complaint if it likely to go beyond 10 works days after the Stage 1 response is due, but if approval is not agreed the resident is provided with Ombudsman referral rights. |
| 5.15         | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response | Yes            | When any extension is discussed, Ombudsman referral rights are always given.                                                                                                                                                      |

## Stage 3

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-------------------------------------------|
| 5.18         | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | N/A            | We don't operate a 3-stage process.       |
| 5.19         | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.                                                                                                                                                                                                                                          | N/A            | We don't operate a 3-stage process.       |

## Section 6 - Putting things right

### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                 | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                     |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.1          | Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.                                                           | Yes            | <p>The format of our Stage 1/Stage 2 responses leads us to be completely transparent and fair to admit errors where they have occurred. Often part of the resolution is a plan to put things right.</p> <p>Complaints culture has changed to owing mistakes and learning from them, not hiding from them.</p> |
| 6.2          | Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents. | Yes            | <p>All remedies are offered in line with our published compensation policy which is designed to be fair to all residents.</p> <p>Our Compensation Policy is on our website for residents to review and can be located <a href="#">here</a>.</p>                                                               |
| 6.5          | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.                                                                                                                | Yes            | <p>All actions considered part of the remedy are clearly explained within the Stage 1/Stage 2 responses. This would include scheduling and timeframes. When things do not go to plan we will contact resident at earliest opportunity to discuss.</p>                                                         |
| 6.6          | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.                                                      | Yes            | <p>As detailed in our compensation policy, such issues are taken into account.</p> <p>Our Compensation Policy can be located <a href="#">here</a>.</p>                                                                                                                                                        |

## Best practice 'should' requirements

| Code section | Code requirement                                                                                                                                                                                           | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.3          | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.           | Yes            | <p>This is always a consideration when investigating any complaint at any stage.</p> <p>Our Ombudsman Determination reviews ensuring we learn from our mistakes.</p> <p>We also hold 4 weekly High-Profile meetings in which cases and problematic issues can be discussed with a view to resolving the issue and making to change to ensure the same issues are not repeated.</p>                                                                           |
| 6.7          | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | No             | <p>We can't see where a legal entitlement to compensation would arise. Usually, the issues are kept very separate once the issue in hand becomes a legal matter.</p> <p>Until a court date has been set, as per HOS guidance the complaints route is always a viable option to resolve a dispute, and this may lead to the award of compensation.</p> <p>Further guidance on this will need to be sought from both the Ombudsman and our own legal team.</p> |

## Section 7 - Continuous learning and improvement

### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                                                                                                                                               | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.2          | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels. | Yes            | <p>Weekly reports are circulated internally. Quarterly reports are circulated to resident panels as well as CSC and EB.</p> <p>Our quarterly Complaints report is also open to public scrutiny via our website.</p> <p>We provide feedback to residents in their response letters highlighting any learnings.</p> <p>We hold quarterly Ombudsman Determination case review meetings to discuss all cases and actions to be undertaken from lessons learnt. This is aimed at all involved with a specific determination, and key stakeholders from within the business.</p> |

### Best practice 'should' requirements

| Code section | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                         | Comply: Yes/No | Evidence, commentary and any explanations                                                                                                                 |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.3          | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.                                                                                   | Yes            | Jamie Ratcliff, Chief Communities & Sustainability Officer is responsible for Sovereign Network Homes complaints and sits on the SNG Executive Board      |
| 7.4          | <p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> </ul> | Yes            | All of these will be reported to Customer Services Committee on an ongoing basis as part of demonstration of compliance with the complaint handling code. |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                        |  |  |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | <ul style="list-style-type: none"><li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li></ul> |  |  |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.5 | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.                                                                                                                                                                                                                                                                                                                             | Yes | Any issues to be considered systemic or an ongoing serious risk are flogged in High-Profile meetings that are held 4 times a week. These are overseen by senior management. This leads to effective and swift changes to policy, process etc when needed.                                                                                                                                                                                                                                                                           |
| 7.6 | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul> | Yes | It is often the case that complaints span more than one department, for example, repairs and planned works. In this instance, the teams will collaborate and feed into the responses to make sure that a full and detailed answer to a residents concerns are made. We have a 'one team' approach and so no blame is attached to complaints, they are used as learning tools to better our service.<br><br>We always look to engage with complaints as set by the Chartered Institute of Housing and the Housing Ombudsman Service. |

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

| Code section | Code requirement                                                                                                                              | Comply: Yes/No              | Evidence, commentary and any explanations                                                                                                                                                                                                                                                                             |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.1          | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. | Yes                         | Carried out annually and added to our website.                                                                                                                                                                                                                                                                        |
| 8.2          | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.                              | Yes/Not applicable just yet | We have just merged with Sovereign to become SNG. Over the next 18 months (aim April 2025) we will bring complaints together, looking to combine the best of both organisations.<br><br>As part of figuring out what this looks like we will be considerate of the code and complete the self-assessment accordingly. |



|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                                                             |
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|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                                                             |
| <b>8.3</b> | <p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"><li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li><li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li><li>• include the self-assessment in their annual report section on complaints handling performance</li></ul> | Yes | We currently report self-assessment to our CSC and Resident Panels. We also add to website. |