

Complaints Handling Code Self-Assessment Form - 2023

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

| Definition of a complaint - Mandatory 'must' requirements | | | |
|---|---|----------------|---|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 1.2 | A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i> | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 4.1. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 4.2 and 5.2. |
| 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 set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 4.4. |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 5.1. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 8.1 and 8.2. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 8.1 and 8.2. |

| Definition of a complaint - Best practice 'should' requirements | | | |
|--|---|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 1.4 | Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received. | Yes | In addition to our formal complaints procedure, Orwell recognises initial enquiries regarding situations which require an intervention. We aim to resolve initial enquiries within two working days. |
| 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 | Orwell uses transactional surveys to gauge and monitor customer satisfaction with several processes such as responsive repairs. If negative feedback is received in a survey, we don't automatically escalate it as a formal complaint. However, all negative comments received in transactional surveys are followed up by contact from a member of staff and customers are advised how they can make a formal complaint if they wish to. |

Section 2 - Accessibility and awareness

| Accessibility and awareness - Mandatory 'must' requirements | | | |
|--|---|-----------------------|---|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 | Customers can complain online, face to face, by telephone, via the portal (we will soon have a tenant's app also), social media and in writing (letter or email). This is set out in our Complaints, Compliments and Compensation Policy within paragraph 6.1. |
| 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, Compliments and Compensation Policy is available on our website. Customers can also request a paper copy, an easy read option if required, and the read aloud function can be used online. Our policy details the stages of our procedure, what happens at each stage, and the timelines for responses in Section 7 (paragraphs 7.1-7.6). |
| 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 | There is a section dedicated to complaints on our website including our policy here: https://www.orwell-housing.co.uk/about-us/complaints-compliments-policy-and-procedure/ Our online complaints form is available here: https://www.orwell-housing.co.uk/contact-us/do-you-want-to-make-a-complaint/ |

| Accessibility and awareness - Mandatory 'must' requirements | | | |
|--|---|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 | This is included within our Complaints, Compliments and Compensation Policy at paragraph 2.1 and in sections 13 and 14 (paragraphs 13.1 -14.4). The customer service team have received training on the Equality Act, Neurodiversity and mental health awareness. Orwell has an accreditation with HDN for ED&I and has won a Bronze Neurodiversity Champion Award. Orwell is fully committed to ED&I, and our strategy and further information on this can be found here: https://www.orwell-housing.co.uk/about-us/equality-diversity-and-inclusion-at-orwell/ |
| 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 | The complaints policy and process are available online, as is the Ombudsman's Complaint Handling Code and our self-assessment of compliance with it and information about the Housing Ombudsman. This can be found here: https://www.orwell-housing.co.uk/about-us/complaints-compliments-policy-and-procedure/ and here: https://www.orwell-housing.co.uk/latest-news/orwell-news/complaints-handling-code-strengthened/ and here: https://www.orwell-housing.co.uk/media/2689/summary-of-complaints-performance.pdf Information about complaints, including lessons learned, is included in our Annual Report. The Housing Ombudsman scheme is referred to in complaints correspondence, on our website and in other communication with customers. The process has been featured in customer newsletters. |

| Accessibility and awareness - Mandatory 'must' requirements | | | |
|--|--|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | This is included in stage one and two response letters. It is also covered when writing to acknowledge a delay in responding. This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 10.1. Orwell's regular e-newsletter to residents has also featured the Ombudsman's service, and we will refresh this at regular intervals. |
| 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 | This advice is included in our complaints acknowledgements which are sent to all complaints logged within 5 calendar days, and in our stage 1 and stage 2 responses. |

| Accessibility and awareness - Best practice 'should' requirements | | | |
|--|--|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 6.2. |

Section 3 - Complaint handling personnel

| Complaint handling personnel - Mandatory 'must' requirements | | | |
|---|---|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 | The Head of Customer Service is currently the Complaints Officer. This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 6.1 |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | Regular training on complaint handling is provided as part of CPD for all staff who may be asked to investigate ad complaint. When cases are allocated, the complaints handler chosen will not have previously been involved with the case to ensure impartiality. |

| Complaint handling personnel - Best practice 'should' requirements | | | |
|---|---|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 3.3 | Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | Our complaints are allocated to leaders within the organisation, who all receive training to enable them to handle complaints sensitively and fairly. Staff across all areas of the business handle complaints to ensure access to all departments as required. The Complaints Officer has the autonomy to resolve some complaints themselves and award compensation up to a level set out in the Standing Orders. All leaders can award compensation up to levels set out within the Standing Orders. |

Section 4 - Complaint handling principles

| Complaint handling principles - Mandatory 'must' requirements | | | |
|---|---|----------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 within five days of receipt. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 4.4 and 7.1. Orwell has a CRM system where all complaints are logged, which provides an audit trail. |
| 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 | Orwell uses letter templates which allow a section for staff to cover their understanding of the complaint and what their complaint is about. Complaint handlers are advised to clarify with a customer if they are unclear what the complaint is about. |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 3.3 |
| 4.7 | The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 3.3. Orwell staff all have to read the Policy annually as part of their training and compliance and are therefore reminded of this point. |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 14.4. |

| Complaint handling principles - Mandatory 'must' requirements | | | |
|--|---|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 4.12 | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. | Yes | Customers are given the opportunity to comment on any findings made and can contact us at any point throughout the complaints' procedure. Staff may also be asked to comment on their position and the complaint handler's findings where relevant. This is set out in our Complaints, Compliments and Compensation Policy and procedure within 9.1. |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure at paragraph 7.6. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 8.1. |
| 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 | These records are all kept within the case on our CRM system. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 12.1. Orwell has an unreasonable behaviour and demands policy and procedure which covers this. |

| Complaint handling principles - Best practice 'should' requirements | | | |
|--|--|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | This is what we recommend and train staff to do. We always endeavour to be clear about we can do and what we can't. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.2. The complaints officer monitors all complaints and would respond accordingly should there be an urgent action required. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 5.2, 13.1, 13.2 and 14.3. |
| 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 | Where a complaint refers to legal obligations, legal advice would be sought by Orwell and our understanding of obligations on all sides set out. |
| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | No | Orwell is a small organisation and so staff are sometimes referred to by name in complaints. Training will be rolled out to staff to avoid this wherever possible going forwards, however this is not always possible. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | This is what we recommend and train staff to do. This is also set out within our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |
| 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 | A transactional survey is sent to all customers who make a complaint. Lessons learned from these surveys are shared with the Customer Insight Committee and relevant members of staff. |
| 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 | Feedback is shared and complaints surveys discussed. Complaint information including lessons learned is shared and discussed at Full Management Team every six-months and in 121s. |

| Complaint handling principles - Best practice 'should' requirements | | | |
|--|---|-----------------------|---|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 covered within our Unacceptable Behaviour and Unreasonable Demands Policy and Procedure. https://www.orwell-housing.co.uk/media/3269/unacceptable-behaviour-and-unreasonable-demands-policy-and-procedure.pdf |

Section 5 - Complaint stages

| Complaint stages - Mandatory 'must' requirements - Stage1 | | | |
|---|--|----------------|---|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 5.1 | Landlords must respond to the complaint <u>within 10 working days</u> 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 9.1 to 9.4. |
| 5.6 | 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. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 9.3 |
| 5.8 | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure at paragraph 9.2 |

| Complaint handling principles - Mandatory 'must' requirements – Stage 2 | | | |
|--|--|-----------------------|--|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.6 |
| 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 | Orwell uses letter templates including sections for complaint handlers to set out their understanding of the complaint and the outcomes being sought. Complaint handlers are advised to clarify with a customer if they are unclear about any aspect of a complaint. There is a specific letter template within the suite which colleagues can use to request additional information from customers. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.3. |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.3. |
| 5.13 | Landlords must respond to the stage two complaint <u>within 20 working days</u> 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.3. |
| 5.16 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 9.2. Orwell does not have a third stage to its complaints procedure. |

Complaint handling principles - Mandatory 'must' requirements – Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| | <ul style="list-style-type: none"> • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | | |

| Complaint handling principles - Mandatory 'must' requirements – 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 | Orwell operates a two stage complaints policy and procedure which can be found here: https://www.orwell-housing.co.uk/about-us/complaints-compliments-policy-and-procedure/ |
| 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"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | N/A | N/A |

| Complaint handling principles - 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |
| 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 | As part of our complaints investigations, previous issues of a similar nature are considered as part of the background to the complaint. Our CRM system and all other available records are scrutinised by complaint handlers to ensure all relevant background information is taken into account.. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within 7.4. |
| 5.12 | The person considering the complaint at stage two must not be the same person that considered the complaint at stage one. | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within 7.4. |
| 5.13 | Landlords must respond to the stage two complaint <u>within 20 working days</u> 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.3. |
| 5.16 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition | Yes | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 9.2. Orwell does not have a third stage to its complaints procedure. |

Complaint handling principles - Best practice 'should' requirements – Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|---------------------|---|-----------------------|--|
| | <ul style="list-style-type: none"> • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | | |

Complaint handling principles - Best practice 'should' requirements – 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 7.5. |

Complaint handling principles - Best practice 'should' requirements – 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 <u>within 20 working days</u> 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 | N/A |
| 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 | N/A |

Section 6 - Putting things right

| 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 | Orwell considers all complaints to be a rich source of feedback to help us to improve our services and processes. We want to resolve complaints and learn from them. We review all learning on complaints and have a Complaints Handling Assessment Team who review complaints each quarter to ensure we are acting fairly. Our Policy sets out that we acknowledge our failings in our complaint letters where things have gone wrong, and set out what we have done or will do to put things right. This is at paragraph 9.2. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within 9.2, 17.1 and 17.2. We also provide staff training on complaints which covers this area. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraph 9.2 and 9.3. |
| 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 | This is set out in our Complaints, Compliments and Compensation Policy and procedure within paragraphs 17.1 and 17.2. |

| Putting things right - 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 | Orwell considers all complaints to be a rich source of feedback to help us to improve our services and processes. This is our practice and widely encouraged by the Complaints Officer. We also review all learning on complaints and have a Complaints Handling Assessment Team who review complaints each quarter to ensure we are acting fairly. |
| 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. | Yes | Orwell recognises that customers sometimes have recourse to legal redress. In these circumstances, we will continue to investigate a complaint and offer a resolution unless we receive legal advice to the contrary. We will obtain relevant legal advice in such cases. |

Section 7 - Continuous learning and improvement

| 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 | We publish our themes from learning to colleagues and customers in our annual report. We have introduced a customer Complaint Handling Assessment Team to scrutinise complaint handling on a quarterly basis. We also have a Customer Insight Committee who review Complaint Reports on a quarterly basis including learning. An annual report taken to our Board setting out information on complaints received that year, with a focus on key themes and areas for improvement. Complaints re reviewed bimonthly at Full Management Team meetings, and feedback and learning on individual cases is shared with colleagues on a case by cases basis as appropriate. |

| Continuous learning and improvement - 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 | A member of the Board (Chair of the Customer Insight Committee) has been appointed to this position. |
| 7.4 | As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling • The annual performance report produced by the Ombudsman, where applicable • 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. | Yes | Complaints information including learning and themes is reported to each Board as part of an overall performance report. Details of any cases referred to the Ombudsman, and outcomes, are included. Complaints information is also shared on a quarterly basis with our Customer Insight Committee and CHAT group, and annually with Board. It is published to our customers in our annual report. Ombudsman complaint outcomes are shared with colleagues and closely tracked by the Complaints Officer. |
| 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 | Complaints themes are shared at bimonthly FMT meetings, at Customer Insight Committee and Board. The Executive Team also discuss any complex complaints, including cases referred to the Ombudsman, including outcomes, resolution and learning points. Actual cases inform training for colleague son complaints and are fed into training and the contract monitoring process for contractors where appropriate. |

| Continuous learning and improvement - Best practice 'should' requirements | | | |
|--|---|-----------------------|---|
| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
| 7.6 | <p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | No | <p>One of Orwell's organisational values is 'collaborative.' As such, our culture and practice is to work co-operatively across teams and departments to resolve complaints. This requirement is also included in our code of conduct which every employee and board member signs annually.</p> |

Section 8 - Self-assessment and compliance

| 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 | This is done annually and can be found on our website here: https://www.orwell-housing.co.uk/about-us/complaints-compliments-policy-and-procedure/ |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | As above. This would be refreshed after any significant changes. |
| 8.3 | Following each self-assessment, a landlord must: <ul style="list-style-type: none"> • 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; • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents; • include the self-assessment in their annual report section on complaints handling performance. | Yes | Our self-assessment is scrutinised by Customer Insight Committee and reported to Board. The outcome is published on our website (as above) and in our annual report. |