

Housing Ombudsman Complaint Handling Code

Self-Assessment of Compliance – Lewes & Eastbourne Councils

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	Actions required to comply by 1 st October
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	Whilst the Corporate Complaints Procedure does not include this definition, a resident-led scrutiny review of complaints handling identified the need for a specific procedure for Homes First. The Homes First Complaints Resolution Policy and Procedure includes this definition.	Place HF Complaint Resolution Policy and Procedure on the website. Include link in this self-assessment doc.
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	Officers can identify directly in emails or with the customer during phone calls whether the customer would like a complaint created and then action accordingly. Complaints submitted by a third party or representative are managed in line with the corporate complaints process.	NFA

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	All complaints are logged for further investigation in line with the complaints resolution procedure.	NFA
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Complaints are accepted in line with our Corporate complaints procedure which details the exclusions (valid reasons not to do so). If deemed an initial request for service where the council has not had the opportunity to rectify the issue, then the matter will be referred to the relevant team for action and the customer will be informed accordingly	NFA
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	The corporate complaints policy clearly stipulates matters which are not considered to be a complaint and the reasons.	NFA
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	Customers are informed why a complaint is not accepted and advised what alternative action can be taken and given the appropriate advice.	NFA

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	Staff receive online and face to face training regarding the complaints process and the importance of determining whether the customer's concerns meet the criteria for a "complaint".	NFA
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.	Partly	All perception and transactional surveys include 'in-survey' triggers and ask participants if they would like to receive a call back about any expressions of dissatisfaction or issues they are experiencing at the time.	Formal process for dealing with requests for call-backs and onward performance monitoring to be agreed.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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	Complaints can be made through the online complaints for, letter, email and over the telephone if customers are unable to use any of the other means.	Include link to CRP&P
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	The complaints policy is available on-line and hard copies can be sent to customers who do not use the internet.	NFA
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	The complaints procedure is documented online, available to download and easily searchable by entering 'complaints'. Customers can also ask Ellis, our chatbot about complaints and be directed to the complaints page.	NFA

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	The complaints procedure details support available to complete the complaints form through the contact centre or staff visit if the customer is unable to attend our offices. All Homes First Staff are required to complete a mandatory online training course on Equality and Diversity. Specialist complaints staff are able to identify any reasonable adjustment requirements through initial contact to confirm the nature of the complaint.	NFA
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	Information about the complaints process and complaints handling performance is publicised through Tenants Open Voice and our Annual Report to Tenants, which are also published on our website. Information relating to the Housing Ombudsman Scheme is contained within the complaints procedure on the website.	NFA
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is provided as part of the Stage 2 response and we now provide information as early as tenancy welcome information pack.	NFA
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	As Above	NFA

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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.	Partly	Complaints made on social media are picked up by officers and actioned, which could include determining that a complaint should be logged or Customer First sharing a link to the online complaints form.	Discuss with Linda

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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 is a dedicated Customer Experience team which equates to 4FTE (Team leader and 3 Specialist Advisors (1 fixed-term to November 2023), responsible for the management and resolution of Stage 1 and 2 complaints.	NFA
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Relevant training is provided as part of Induction, and ongoing during the role. The Team are independent of the rest of the service. Any conflict of interests are declared and if for example the Advisor knows a complainant then the complaint is referred to a different officer to investigate. Stage 2 complaints are always investigated by a staff member who was not involved at Stage 1.	NFA

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	<p>We have a dedicated customer experience team within Homes First who manage complaints.</p> <p>The Specialist Advisors who manage complaints received Induction training and ongoing support. They have access to Ombudsman training and general training on Customer Service skills and supporting distressed residents.</p> <p>The team has excellent relationships with other teams and regular face to face meeting to help</p>	NFA

			facilitate resolution of complaints.	
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Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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	There are no extra named stages, outside of Stage 1 and Stage 2. Complaints can also be managed informally where an early resolution can be achieved. Such complaints are still logged at Stage 1 of the procedure for reporting and management purposes. If the complaint can be resolved within 2 days the complaint will be closed. All complaints are acknowledged within 5 days of receipt.	NFA
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	Yes	There is a standard template and Specialist Advisors use this to confirm their understanding of the complaint. Specialist Advisors also attempt to call complainants upon receipt of a complaint to confirm what requires investigation and acknowledge receipt of the complaint. Customers are asked for clarification where there is any uncertainty as to the nature of their complaint, either in the written acknowledgement on by phone	NFA

	the full definition agreed between both parties.			
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The Specialist Advisors managing complaints are impartial and work within a team that is independent from other areas of the organisation.	NFA
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	Specialist Advisors who manage complaints receive training in data protection as part of their Induction training. They are objective and independently review the information on a customer record as part of their investigation. Customers are asked to submit any supporting evidence to help with a complaint investigation. Authorisation to disclose is requested when a third party submits a complaint on behalf of a customer.	NFA
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	Customers can select a preferred communication channel when they submit a complaint online and verbal acknowledgement of complaints helps to identify any specific communication needs and agree frequency of contact.	NFA
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	If a complaint relates to a member of staff, the complaint is referred to their manager to review directly with them and give the officer the opportunity to comment on their version of events. The outcome of the review is fed back to the complaints officer to consider as part of the overall investigation. Any adverse findings are acknowledged within the complaint response and action taken, such as staff training, to help prevent recurrence of similar complaints.	NFA
4.13	A landlord must include in its complaints policy its timescales for a resident to request	No	We do include a timescale of a year within the policy for reporting a complaint, from when the original dissatisfaction has occurred	Undertook a scan of multiple landlords

	escalation of a complaint			policies and found that the majority do not include this. We do not feel that tenants should necessarily be limited in relation to escalation and the majority of escalations come in a timely fashion. Will consider further as required.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	All complaints received are considered on their individual circumstances. An example of when a complaint is not escalated may be when the Stage 2 complaint submitted bears no relation to the original Stage 1 complaint. In this case a new S1 would be set up for the customer.	NFA
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	Customer complaint records are kept up to date by the SA dealing with the complaint. All notes of customer contact, copies of the complaints and responses, and information from officers are uploaded to the customer complaint record.	NFA
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a	Yes	We have an Unreasonable and Unreasonably Persistent Complainants policy.	NFA

	complaint.			
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	This is done as part of the complaint investigation and contact with the complainant where appropriate. For example, we manage customer expectations regarding timescales for some repair works as well as compensation requests.	NFA
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	We strive to close complaints at the earliest opportunity, but recognise too that some complaints take longer than the target timescales to close. Where this is the case the customer is kept updated regarding progress of their complaint. Urgent actions, in particular those relating to Health & Safety are escalated immediately to the relevant service Leads.	NFA
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	Our complaints resolution policy and procedure includes scope for appointed advocates to represent complainants and we liaise with representatives where Authorisation To Disclose has been provided. Additionally, we signpost to support and advocacy services as part of the complaints process.	NFA
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	Advice is sought from relevant teams in relation to complaints with legal obligations, for example complaints relating to homelessness decisions or disrepair claims	NFA

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Generally, we do not identify individual members of staff or contractors where there is no need to, and we approach the complaint as a response on behalf of a team or the Council. Where a customer is making a specific complaint about a member of staff then this is acknowledged within the complaint investigation. Where the response requires a timeline of events and is factual in relation to what has occurred, it can be appropriate to include reference to individual officers.	NFA
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Holding responses are sent when there are delays and customers are kept informed regarding updates by phone. Customers have the direct contact details of the officer investigating their complaint	NFA
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	We contract an external research organisation to gather feedback on customer satisfaction regarding complaint handling. The results of this research are considered by the Customer Experience Team and Senior Leadership Team to help identify lessons learnt	NFA
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	The Customer Experience team is delivering Complaints training throughout Homes First which includes the importance of "lessons learnt". Impact of upheld complaints is communicated to service lads for dissemination to staff teams. When closing complaints information is included on the system as part of this process to detail any improvement actions to help reduce reoccurrence. Complaint information is used to help determine service improvement and identify staff training requirements.	NFA

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	Decisions made regarding any restrictions on contact is made with senior managers approval and in consideration of the Equality Act and also staff welfare.	NFA
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Section 5 - Complaint stages

Mandatory 'must' requirements Stage

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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	Where there is good reason to keep the complaint open (e.g. customer requests this and it would cause more dissatisfaction closing it) then the customer is kept updated and the complaint continues to be monitored by the Customer Experience SA until such time as e.g. appointment dates are available. The service standard within the procedure is 10 working days and holding responses are provided with an explanation if this is likely to be exceeded.	NFA
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	Complaints are responded to when information is known regarding the action that will be taken. For example, if contact from an officer has been requested or when an appointment date for a repair is available. Works planned are recorded on a spreadsheet and reviewed by the Repairs team. The Customer Experience SA will monitor and track complaints where required to help ensure action is taken as confirmed in the complaint response.	NFA

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	The complaint acknowledgement and response typically itemsises each issue raised within the complaint and relevant policy, legislation and good practice is referenced as appropriate.	NFA
5.8	<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"> • 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 all included within the complaint response	NFA

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	Customers are advised how to escalate to S2 within the S1 response.	NFA
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	Customers are sent an acknowledgement upon receipt of their Stage 2 complaint which explains the officer's understanding of their concerns and the action that the customer wants taken to resolve the complaint. Customers are asked to contact the officer if there is any misunderstanding regarding the nature of the complaint	NFA
5.11	Landlords must only escalate a complaint to stage two once it has	Yes	This is done as per our complaints process. Customers are advised in the S1 response how to escalate to S2.	NFA

	completed stage one and at the request of the resident.			
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	A different investigation officer is always appointed to a Stage 2 complaint.	NFA
5.13	Landlords must respond to the stage two complaint within 20 working days 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	The procedure service standard is to respond within 20 working days. Customers are advised of the target date within the S2 acknowledgment Where delays occur, customers are kept updated.	NFA
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 • the details of any remedy 	Yes	This information is included within a S2 complaint response. There is no third stage	NFA

	<p>offered to put things right</p> <ul style="list-style-type: none"> • 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. 			
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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 operate a two stage formal complaint process	NFA
5.20	Landlords must confirm the following	N/A	N/A	NFA

	<p>in writing to the resident at the completion of stage three in clear, plain language:</p> <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 			
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Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	The officer investigating the complaint will discuss any delays or extensions required and agree that this is acceptable with the customer	NFA
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	Yes	Whilst we have not encountered this situation to date, this would happen.	NFA

	plan for responding and/or the proposed timeliness of a landlord's response.			
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	All information on a customer record is reviewed as part of a complaint investigation and regularly a timeline of events is created.	NFA
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 do this, the phone call acknowledgement helps to capture any additional issues that were not raised in the submitted complaint. Additional but relevant issues are referred for action to the relevant teams and responded to as part of the Stage 1 reply.	NFA

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	Yes	The Customer Experience Team keep the complainant informed throughout and agree timescales or refer to Ombudsman.	NFA

	by both parties.			
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	Whilst we have not encountered this situation to date, this would happen.	NFA

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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 within 20 working days 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	NFA

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	NFA
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Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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	Examples of dispute resolution include offers of compensation and goodwill payments	NFA
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	The Customer Experience team has a compensation policy to use in consideration of financial remedy offers. This helps to ensure consistency.	NFA
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 happens.	NFA
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any	Yes	This is all considered and a schedule including statutory payments, quantifiable losses is contained within the policy used by the Customer Experience Team when considering	NFA

	quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.		offering financial redress.	
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
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	Lessons learnt are identified from complaints and recommendations for improving service subsequently made to relevant organisational areas. The Customer Experience team is looking to incorporate more service and performance improvement project work into its role.	NFA
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	Legal advice is sought where needed, and guidance given by service managers with regards to redress. Compensation claims for repairs are managed by the Property Services manager who liaises with the customer's and Council's solicitors.	NFA

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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 report complaints performance and lessons learnt in both our residents newsletter and annual reports	NFA

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply
7.3	<p>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.</p>	Yes	<p>The Company Secretary and Board of EHL receive regular performance reports and an annual report regarding complaints. The Leader of Lewes District Council takes a keen interest in complaints management and is regularly updated on both performance and individual complaints of interest.</p>	NFA
7.4	<p>As a minimum, governing bodies should receive:</p> <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 	Yes	<p>Quarterly reports are provided to Service & Performance Committee and a summary is provided in quarterly Head of Service reports to Board. Board are also provided with an annual complaints performance report containing all of this information.</p>	NFA

	<p>produced by the Ombudsman, where applicable</p> <ul style="list-style-type: none"> 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. 			
7.5	<p>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.</p>	Yes	<p>Themes and trends in complaints are considered by the Senior Leadership Team. Service improvement actions or broader projects are cascaded through teams meetings and support for implementation is provided by the Customer Experience Team.</p>	NFA
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 	Partly	<p>The Customer Experience Team collaborate across all areas of Homes First, having regular meetings with colleagues in Property Services and Housing Needs and individual meetings as required with Neighbourhood Management. There is further work to do on raising awareness and building capacity in relation to the CIH Professional Standards.</p>	<p>Raise awareness and build capacity across Homes First in relation to CIH Professional Standards.</p>

	<ul style="list-style-type: none">• 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.			
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Actions required to comply by 1 st October
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 our second self-assessment and we will undertake it annually.	NFA
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will happen.	NFA
8.3	<p>Following each self-assessment, a landlord must:</p> <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	This happened with our first self-assessment and will be implemented in relation to this and future self-assessments.	NFA

