

St Mungo's Complaints Handling Self-Assessment

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaint: <i>An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.</i>	Included in our Complaints policy, section 5.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<i>The complainant 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 be handled in line with our usual process.</i>	Included in our complaints policy, section 5.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be	Yes	<i>A service request is a request from a person requiring action to be taken to put something right. Often, service requests will be 'quick wins'. They can avoid formal complaints. Service requests should be reviewed at each team meeting.</i>	Included in our complaint's procedure, section 2.

	recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<i>A complaint must be raised if the client raises dissatisfaction with the response to their service request.</i>	Included in our complaint's procedure, section 2.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<i>An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where we ask for wider feedback about our services, we also must provide details of how clients can complain.</i>	Included in our complaint's policy, section 3.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<i>We must accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint, we must be able to evidence our reasoning. Each complaint must be considered on its own merits.</i>	Included in our complaint's policy, section 7.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	Yes	<i>The following circumstances are acceptable exclusions:</i> <ul style="list-style-type: none"> • <i>the issue giving rise to the complaint occurred over 12 months ago.</i> • <i>legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</i> • <i>matters that have previously been considered under the complaints policy.</i> 	Included in our complaint's policy, section 7.

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	<i>We must accept a complaint referred to it within 12 months of the issue occurring or the resident becoming aware of the issue unless it is excluded on other grounds. We must consider whether to apply discretion to accept a complaint made outside this time limit where there are good reasons to do so.</i>	Included in our complaint's policy, section 7.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<i>If we decide not to accept a complaint, an explanation must be provided to the client to set out the reasons why the matter is not suitable for the complaint process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</i>	Included in our complaint's policy, section 7.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<i>We must not take a blanket approach to excluding complaints; we must consider the individual circumstances of each complaint.</i>	Included in our complaint's policy, section 7.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p><i>Complaints must be handled in accordance with the principles set out in our Equality, Diversity and Inclusion policy.</i></p> <p><i>We will offer support to clients wishing to complain. This may include: support with reading or writing; referral to an advocacy service; support to access translation or an interpreter.</i></p> <p><i>We will make reasonable adjustments to support someone with a disability to complain. Please see our Reasonable Adjustments policy.</i></p>	<p>Included in our complaint's policy, section 4.</p> <p>Our Reasonable Adjustments policy sets out our approach. All our staff, including complaints handlers, attend mandatory Diversity and Involvement webinars and e-learning.</p> <p>Complaints can be made via client facing staff, service managers, our complaints phone line, complaints@mungos.org or the complaints form on website.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p><i>Clients must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the</i></p>	<p>Included in our complaint's policy, section 4.</p> <p>Reasonable Adjustments policy.</p>

			<i>appropriate person to investigate the complaint.</i>	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<i>Clients must not be treated differently if they complain. High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that clients are unable to complain.</i>	Included in our complaint's policy, section 2.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<ul style="list-style-type: none"> • Website. • Appendix 12 - Complaints overview leaflet • Appendix 7 - Client feedback card (building based) 	Our complaints policy is readily available on our website and presented in a clear and accessible format. Additionally, we offer a complaints overview leaflet that explains all stages of the process in an accessible manner for clients, along with a feedback form for staff to gather input. Furthermore, we ensure that our complaints leaflets are easily accessible in communal areas for clients' convenience.

3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	We have information about the Housing Ombudsman and the code in our complaints policy, specifically in sections 5, 6, and 7. We refer to the code in sections 2 and 9, as it has informed our policy and procedure. Furthermore, our procedure includes several references to the Housing Ombudsman and the Local Government and Social Care Ombudsman, highlighting that clients can utilise these services.	Included in our complaint's policy, section 5, 6 and 7. Included in our complaint's procedure, section 2 and 9. St Mungo's publicises the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters and online. We also include details of the Housing Ombudsman on our letter templates.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<i>We must give clients the opportunity for a representative to deal with their complaint on their behalf and to be represented or accompanied at any meeting with the investigator.</i> <i>The complainant 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 be handled in line with our usual process.</i>	Included in our complaint's policy, section 4, and section 5. Included in our complaint's procedure, section 11.

			Complaints procedure, section 11: Representatives and Advocates	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<ul style="list-style-type: none"> • Correspondence with clients. • Included in our complaint's policy, section 5, 6 and 7. • Included in our complaint's procedure, section 2 and 9. • Appendix 1 - Stage one response letter template • Appendix 14 - Stage 2 Response Letter Template 	<p>We provide information in our complaints correspondence.</p> <p>We signpost clients to the Housing Ombudsman once they have exhausted our internal process.</p> <p>Our materials ensure clients are signposted to the Housing Ombudsman throughout, including details of the Housing Ombudsman on our letter templates.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Quality and Continuous Improvement Advisors Job IDs. Head of Safety and Quality Assurance Job ID.	The Quality and Continuous Improvement Team delivers this function.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Quality and Continuous Improvement team access on our internal system and processes.	The Quality and Continuous Improvement team have access to staff at all levels within our internal system, through internal meetings, and other communication channels. They manage our complaints inbox and phone line, offering advice and guidance to staff. Additionally, they provide advice on mediation and handle all requests for stage 2 escalation, thereby facilitating dispute resolution

				processes and ensuring fairness throughout.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p><i>We must work to create a culture where people do feel able to complain, providing reassurance and guidance to enable people to feel confident about complaining.</i></p> <p><i>We are committed to learning from complaints. Where further learning may need to be identified, we may commission a Best Practice Review or further investigation.</i></p> <p>There is a requirement to capture local learning from complaints and to log organisational learning recommendations in our procedure.</p> <p>We encourage client-facing teams to have a Complaints champion that shares learning from complaints in team meetings.</p> <p>We include a section on learning in our complaint's procedure (section 8).</p>	<p>Included in our complaint's policy, section 2, and section 4.</p> <p>Included in our complaint's procedure, section 3, 5, 7 and 8.</p>

			Complaints e-learning.	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	St Mungo's Complaints policy. <i>Clients must not be treated differently if they complain. High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that clients are unable to complain.</i>	Included in our complaint's policy, section 2.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	St Mungo's complaints policy. St Mungo's complaints procedure.	We only have Service requests, Stage 1, and Stage 2 as per the Complaints Handling Code guidance.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	St Mungo's complaints policy. St Mungo's complaints procedure.	We only have Service requests, Stage 1, and Stage 2 as per the

	complaint process unduly long and delay access to the Ombudsman.			Complaints Handling Code guidance.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Examples of complaints responses.	Our protocol ensures that all complaints, including those involving third-party contractors or independent adjudicators, are addressed within the framework of the two-stage complaints process as mandated by the Code. For instance, if a complaint pertains to work conducted by a contractor, our repairs team oversees the handling of the complaint and coordinates closely with the contractor involved. This approach ensures a streamlined and transparent resolution process for our residents.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<i>We are responsible for ensuring that any third parties handle complaints in line with the Code.</i>	Included in our complaint's policy, section 2.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer	Yes	<i>At this stage, set out your understanding of the complaint and the outcomes the client is seeking. If any aspect of the</i>	Included in our complaint's procedure, section 1, 3 and 4.

	<p>to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.</p>		<p><i>complaint is unclear, you must ask the client for clarification.</i></p> <p><i>The Quality Team must acknowledge Stage 2 requests within 2 working days, setting out their understanding of issues outstanding and the outcomes the complainant is seeking.</i></p> <p>Appendix 1 - Stage one response letter template</p> <p>Appendix 14 - Stage 2 Response Letter Template</p>	<p>Included in our complaint’s templates.</p>
<p>5.7</p>	<p>When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.</p>	<p>Yes</p>	<p><i>The acknowledgement must identify all grounds of the complaint and what the complainant wants to happen. The complaint handler must ensure from the complainant that they have understood all the issues correctly. If any aspect of the complaint is unclear, the complainant must be asked for clarification and the full definition agreed between both parties. If any can be immediately resolved, do so. Be clear in managing expectations from the outcome if any desired outcomes</i></p>	<p>Included in our complaint’s procedure, section 3 and 4.</p>

			<p><i>are unreasonable or unrealistic. At this stage, it must be clear which aspects of the complaint we are responsible for, and which we are not, and we should clarify any areas where this is not clear.</i></p> <p><i>The Quality Team must acknowledge Stage 2 requests within 2 working days, setting out their understanding of issues outstanding and the outcomes the complainant is seeking. A Stage 2 leaflet should be sent. If any aspect of the complaint is unclear, the complainant must be asked for clarification and the full definition agreed between both parties.</i></p>	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and 	Yes	<p><i>At each stage of the complaints process, complaint handlers must:</i></p> <ul style="list-style-type: none"> <i>- deal with complaints on their merits, act independently, and have an open mind.</i> <i>- give the client a fair chance to set out their position.</i> <i>- take measures to address any actual or perceived conflict of interest.</i> 	Included in our complaint's procedure, section 1.

	d. consider all relevant information and evidence carefully.		- consider all relevant information and evidence carefully.	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<i>Where this is agreed, the complaint handler must agree with the client suitable intervals for keeping them informed about their complaint.</i>	Included in our complaint's procedure, section 3 and 5.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<i>The complaint handler must keep a record of any reasonable adjustments agreed upon, as well as a record of any disabilities a client has disclosed. Any agreed upon reasonable adjustments must be kept under active review.</i> Diversity implications section on the Complaints policy. Reasonable Adjustments policy.	Included in our complaint's procedure, section 1.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Stage recommendation examples. Stage 2 request letter response examples.	Requests for escalation are handled by our Quality and Continuous Improvement Team, who assess each request using a stage 2 recommendation template and guidance. If a complaint is not accepted for stage 2

				escalation, the team issues a response clearly outlining the reasons, in accordance with the provisions set out in section 2 of the Code. This ensures transparency and compliance with the Code's requirements.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	<i>Teams must log the full complaint response on Opal. They must also keep a record of the original complaint and the date received, all correspondence with the client, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.</i>	Included in our complaint's procedure, section 1.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<i>Where something has gone wrong, acknowledge this, apologise, and set out the actions taken, or that you intend to take, to put it right. Where we have got something wrong, the remedy must reflect the extent of any service failures and the level of detriment caused to the complainant.</i>	Included in our complaint's policy, Putting things right, section 6. The Quality and Continuous Improvement team also advises and provides guidance around this where needed.

			<p><i>Any remedy offered must reflect the extent of any service failures and the level of detriment caused as a result. We must carefully manage the expectations of complainants and not promise anything that cannot be delivered or would cause unfairness to other clients. The remedy offer must clearly set out what will happen and by when, in agreement with the client where appropriate. Any remedy proposed must be followed through to completion.</i></p> <p><i>Complaint handlers must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</i></p>	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<p>Included in the Complaints procedure, section 16 - Unreasonable levels of contact and unacceptable contact.</p> <p>Appendix 4 - Local boundaries example</p>	We have a comprehensive section that offers guidance on managing unreasonable levels of contact and unacceptable contact. This includes advice on the reasons for implementing restrictions and review periods.

				<p>We also offer advice to staff on this matter when needed.</p> <p>Additionally, we provide a local boundaries example to assist teams in establishing boundaries.</p>
5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	Yes	<p>Diversity implications, section 4 of our Complaints policy.</p> <p>Unreasonable levels of contact and unacceptable contact, section 16 of our Complaints procedure.</p> <p>Responding to Challenging Behaviour policies and procedures.</p>	<p>Each situation is individually assessed, acknowledging the potential distress of complainants and the influence of support needs on their behaviour. We provide guidance in our procedure regarding the necessity for teams to consider and address the underlying reasons behind the behaviour, aiming for proportionate and fair outcomes aligned with our commitment to equality.</p>

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p><i>Complaint handlers must consider factors such as the complexity of the complaint and whether the client is vulnerable or at risk.</i></p> <p><i>Where something has gone wrong, acknowledge this, apologise and set out the actions taken, or that you intend to take, to put it right. Where we have got something wrong, the remedy must reflect the extent of any service failures and the level of detriment caused to the complainant. At the same time, do not promise anything that cannot be delivered, or that would cause detriment to other clients.</i></p> <p>Putting things right, section 6 of our Complaints policy.</p>	<p>Included in our complaint's policy, section 1.</p> <p>Included in our complaint's procedure, section 3 and 5.</p>

6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<p><i>Same day – Log the complaint on Opal.</i></p> <p><i>5 working days from receipt of complaint – the complaint handler sends an acknowledgement to the complainant (suggested template: appendix 2). The acknowledgement must identify all grounds of the complaint and what the complainant wants to happen. The complaint handler must ensure from the complainant that they have understood all the issues correctly. If any aspect of the complaint is unclear, the complainant must be asked for clarification and the full definition agreed between both parties. If any can be immediately resolved, do so.</i></p>	Included in our complaint's procedure, section 3.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p><i>Stage 1 decision – issue within 10 working days of the complaint being acknowledged.</i></p>	Included in our complaint's procedure, section 3.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident	Yes	<p><i>You must decide whether an extension to this timescale is needed when considering the complexity of the complaint and</i></p>	Included in our complaint's procedure, section 3.

	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		<i>then inform the client of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the client. Where this is agreed, the complaint handler must agree with the client suitable intervals for keeping them informed about their complaint.</i>	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<i>When a complaint handler informs a client about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</i>	Included in our complaint's procedure, section 3.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<i>A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly under the complaint response on Opal, with appropriate updates provided to the client.</i>	Included in our complaint's procedure, section 3.

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p><i>Each ground of the complaint must be investigated and have a clear outcome, with clear and comprehensive reasons for the decision.</i></p> <p>Appendix 1 - Stage one response letter template</p>	Included in our complaint's procedure, section 3.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p><i>Where clients raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.</i></p>	Included in our complaint's procedure, section 3.
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; 	Yes	Appendix 1 - Stage one response letter template	Included in our Complaints response templates.

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<i>If all or part of the complaint is not resolved to the complainant's satisfaction at stage 1, they may contact the Quality Team, requesting their complaint go to Stage 2.</i>	Included in our complaint's procedure, section 4.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<i>The Quality Team must acknowledge Stage 2 requests within 2 working days, setting out their understanding of issues outstanding and the outcomes the complainant is seeking. A Stage 2 leaflet should be sent. If any aspect of the complaint is unclear, the complainant must be asked for clarification and the full definition agreed between both parties.</i>	Included in our complaint's procedure, section 4.

			<i>Stage 2 requests must be responded to within 5 working days.</i>	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Included in our complaint's procedure, section 4.	In accordance with our procedures, it is our responsibility to make reasonable efforts to understand the resident's dissatisfaction as part of our stage 2 response. All stage 2 requests are handled by the Quality and Continuous Improvement team. Our guidance stipulates that they must outline their understanding of any outstanding issues and the desired outcomes sought by the complainant. This ensures transparency and thoroughness in addressing resident concerns at the stage 2 level.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<i>The Directors are responsible for responding to Stage 2 complaints – they become the “complaint handler”. Directors may choose to appoint an investigator from within their directorate, or to investigate themselves. If appointing an investigator, they should sense</i>	Included in our complaint's procedure, section 4. All stage 2 requests are handled by the Quality and Continuous Improvement team. The Quality and Continuous Improvement team assigns this complaint

			<p><i>test that the person will be impartial and be seen as impartial by a reasonable third party.</i></p> <p><i>Appendix 9 - Investigation Officer Role Description</i></p>	to a different individual from the one who reviewed the complaint at stage 1, and at the Director level.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<p><i>Stage 2 decision – issue within 20 working days of the complaint being escalated and record the response letter within the ‘response given to complainant’ field on Opal.</i></p>	Included in our complaint’s procedure, section 5.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p><i>You must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the client of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the client. Where this is agreed, the complaint handler must agree with the client suitable interval for keeping them informed about their complaint.</i></p>	Included in our complaint’s procedure, section 5.
6.16	When an organisation informs a resident about an extension to these	Yes	<p><i>When a complaint handler informs a client about an</i></p>	Included in our complaint’s procedure, section 5.

	timescales, they must be provided with the contact details of the Ombudsman.		<i>extension to these timescales, they must be provided with the contact details of the Ombudsman.</i>	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<i>A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly under the complaint response on Opal, with appropriate updates provided to the client.</i>	Included in our complaint's procedure, section 5.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<i>Each ground of the complaint must be investigated and have a clear outcome, with comprehensive reasons for the decision.</i> Appendix 14 - Stage 2 Response Letter Template	Included in our complaint's procedure, section 5.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint;	Yes	Appendix 14 - Stage 2 Response Letter Template	Included in our Complaints response templates.

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints procedure. <i>Appendix 9 - Investigation Officer Role Description</i>	Stage 2 is our final response.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; 	Yes	<p><i>Where something has gone wrong we must acknowledge this, set out the actions we have already taken, or are intending to take, to put things right. These can include:</i></p> <ul style="list-style-type: none"> <i>-Acknowledging where things have gone wrong.</i> <i>-Providing an explanation, assistance or reasons.</i> <i>-Apologising.</i> 	Included in our complaint's policy, section 5 - Putting things right.

	<ul style="list-style-type: none"> • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<p><i>-Taking action if there has been a delay.</i></p> <p><i>-Reconsidering or changing a decision.</i></p> <p><i>-Amending a record or adding a correction or addendum.</i></p> <p><i>-Providing a financial remedy.</i></p> <p><i>-Changing policies, procedures or practices.</i></p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<i>Any remedy offered must reflect the extent of any service failures and the level of detriment caused as a result.</i>	Included in our complaint's policy, section 5 - Putting things right.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<i>The remedy offer must clearly set out what will happen and by when, in agreement with the client where appropriate. Any remedy proposed must be followed through to completion.</i>	Included in our complaint's policy, section 5 - Putting things right.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<i>Complaint handlers must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</i>	Included in our complaint's policy, section 5 - Putting things right.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Annual Complaints report for the period from 01/04/2023 to 31/03/2024.</p> <p>May 24 self-assessment against the Code.</p>	<p>We have completed our Annual Complaints report for the period from 01/04/2023 to 31/03/2024. This report encompasses all the requirements outlined in the Code. Consequently, we have revised our Annual self-assessment accordingly.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Complaints annual report considered by the June 24 Client Services Committee and published alongside the trustee's response.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We have just undergone an organisational restructure and completed this self-assessment. We will continue to do this if any other restructures occur.	We will comply with this requirement.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We will comply ion request.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	N/A	We will comply with this requirement if it occurred.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p><i>We are committed to learning from complaints.</i></p> <p>Section 8 - Learning – in our Complaints procedure.</p>	<p>Included in our complaint's policy, section 2.</p> <p>Feedback is sought by members of our Quality and Continuous Improvement team and other trained staff auditors when carrying out our regular quality audit programme of our services.</p> <p>We also ask clients about their satisfaction as part of our complaints satisfaction survey.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p><i>We must work to create a culture where people do feel able to complain, providing reassurance and guidance to enable people to feel confident about complaining.</i></p> <p><i>We are committed to learning from complaints. Where further learning may need to be identified, we may commission a</i></p>	<p>Included in our complaint's policy, section 2, and section 4.</p> <p>Included in our complaint's procedure, section 3, 5, 7 and 8</p>

			<p><i>Best Practice Review or further investigation.</i></p> <p>There is a requirement to capture local learning from complaints and to log organisational learning recommendations in our procedure.</p> <p>We encourage client-facing teams to have a Complaints champion that shares learning from complaints in team meetings.</p> <p>We include a section on learning in our complaint's procedure (section 8).</p> <p>Complaints e-learning.</p>	
9.3	<p>Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.</p>	Yes	<p>Complaints reports. Complaints learning page. Complaints blogs.</p>	<ul style="list-style-type: none"> • Blogs are shared promoting the role of the Housing Ombudsman and notices of maladministration. • Staff are supported in their understanding of the complaints process through

				<p>regular support and supervision sessions, team meetings and, where possible, reflective practice sessions.</p> <ul style="list-style-type: none"> • The Quality and Continuous Improvement team targets messages to staff when there's new information around complaints or learning. • Every quarter we publish and promote our learning and the learning published on the Ombudsman website.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The appointed person is the Head of Safety and Quality.	We hold quarterly meetings with the Executive Director of Client Services and other key stakeholders to discuss the reports.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive	Yes	The appointed person is a trustee and the Chair of the Client Services Committee.	

	complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Complaints reports. Complaints dashboards.	The Client Services Committee receives quarterly and annual complaints presentations and is supported by the Director of Governance and Compliance if they require further detail on any aspect of complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	Complaints reports. Complaints dashboards. Annual complaints reports.	The Client Services committee are provided with quarterly and annual complaints reports providing insights into all these requirements.

<p>9.8</p>	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	<p>Yes, although further work planned.</p>	<p>St Mungo's Excellence Standards and competency framework.</p> <p><i>If a complaint involves two different teams, for example, repairs and a service team, regardless of who handles the response, the overall complaints procedure should remain unified and coherent for the clients.</i></p> <p><i>If the complaint covers multiple functions/teams, allocate it to the team responsible for the most substantive issue of the complaint. However, complaint handler from this team must receive input from the other team/s involved, so as to be able to properly resolve the complaint.</i></p>	<p>It is included in our complaint's procedure, section 1 and 3.</p> <p>Further improvements planned: The Excellence Standards will be reviewed and updated to reflect this language by end of Sept 24.</p>
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