

Appendix B – Self-Assessment Form

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

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

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

Section 1 - Definition of a complaint

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 1.2 | A complaint must be defined as: <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 | The Housing Ombudsman's definition of a complaint has been incorporated within Onwards Complaint Resolution Policy and is embedded within our complaint handling procedures. |
| 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 | Our procedures are designed to ensure that customer enquiries are triaged in a manner which determines whether an enquiry constitutes a complaint, and what the most appropriate course of action is. In some instances, the customer may request that their concern is handled informally, in others it may be deemed more appropriate to automatically escalate the matter to a complaint stage. Our complaint resolution procedures ensure that all complaints, however |

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| | | | received, are handled consistently and in line with our complaints policy. |
| 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 | <p>In the case of informal complaints handled by our Escalation Triage team, should the complainants concern not be resolved within one business day, the matter is automatically escalated to Stage 1, unless otherwise agreed with the complainant.</p> <p>Complainants have the right to request that their concerns are escalated at any time during the process.</p> |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | <p>Within section 3 of our complaint resolution policy, we have detailed what does not constitute a complaint.</p> <p>By way of providing further clarity to complainants, we have included 3 familiar scenarios setting out the difference between a service request and a complaint.</p> |
| 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 | <p>Details of the exclusions are detailed within section 14 of our complaint resolution policy.</p> <p>Our exclusions are driven by factual circumstances, thus preventing inconsistency and/or subjectivity in the event of a complaint being refused. This</p> |

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| | | | <p>ensures maximum fairness and consistency for complainants.</p> <p>We continually review our complaint resolution policy to ensure that all elements of the policy are clear, concise, and easy for our complainants to understand. This includes the section regarding policy exceptions.</p> |
| 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 | <p>A detailed explanation outlining why a complaint has not been accepted is always provided to the complainant. The explanation is issued in writing and in line with our complaint resolution policy. All complaint correspondence includes details of the Housing Ombudsman Service.</p> |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 1.4 | Landlords should recognise the difference between a 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 | <p>Within section 3 of our complaint resolution policy, we have detailed what does not constitute a complaint.</p> <p>By way of providing further clarity to complainants, we have included 3 familiar scenarios setting out the difference between a service request and a complaint.</p> |

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| 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 | Our team proactively contact a selection of customers who express dissatisfaction via our satisfaction surveys. This process involves further information gathering, triaging of the customers concerns and, where possible, the implementation of appropriate resolutions. If a resolution cannot be achieved, our complaint resolution policy is promoted. |
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Section 2 - Accessibility and awareness

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 2.1 | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes | Section 4 of our complaint resolution policy details the multiple channels available to complainants who wish to submit a complaint. |
| 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 | Onwards complaint resolution policy is available on our website under the 'policies' and the 'contact us' sections. The policy explains all aspects of the process in a clear, concise, and customer friendly manner. |

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| | | | Information on how to contact us in relation to a complaint is also provided in a multi-lingual format. |
| 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 | In addition to the above, the 'contact us' section of our website details all channels of communication available to customers. A web-form which can be used to submit a complaint directly to us is also available. |
| 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 | Onward maintains compliance with the Equality Act 2010. We do not have a stand-alone Reasonable Adjustments policy; however, the following policies contain details of the reasonable adjustments available to customers: <ul style="list-style-type: none"> <input type="checkbox"/> Repairs handbook (adaptations to homes) <input type="checkbox"/> Equality and Diversity policy (our equality objectives) <input type="checkbox"/> Customer charter (tailoring our services) <input type="checkbox"/> Tenant handbook (adaptations to homes, and providing extra support to vulnerable customers) e. Adaptation's policy (See page 12, 13) At the time of publication, we can confirm that a dedicated reasonable adjustments policy is in development. |

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| 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 | <p>Our residents right to complain are publicised in a variety of ways.</p> <p>By way of example, our most recent customer newsletter published for Autumn 2023 included a section for how our customers can make a complaint. Information about the Housing Ombudsman Service is also provided in each of our complaint acknowledgment and response letters.</p> |
| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | We publicise the Ombudsman's contact information in all our complaint's correspondence, on our website, and in general correspondence with customers. |
| 2.8 | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted. | Yes | <p>The Housing Ombudsman Service and its contact details are promoted to customers prior to, and throughout each stage of the complaint process.</p> <p>The Complaint Resolution policy advises that complainants may contact the Ombudsman for help and independent advice at any stage during the complaints process.</p> |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 2.2 | Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes | <p>Complaints may be submitted via multiple channels, including via social media. All complaints submitted to Onward, regardless of how they are received, are processed in accordance with our two-stage process.</p> <p>Complainants are informed of how we maintain their confidentiality and privacy in line with our Privacy policy and this is highlighted within our complaint resolution policy.</p> |
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Section 3 - Complaint handling personnel

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 3.1 | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer". | Yes | <p>Our Customer Resolution team has responsibility for complaint handling and is led by our Customer Resolution Manager.</p> <p>The Customer Resolution Manager is our nominated "complaints officer".</p> |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | <p>Our complaint handlers receive full training and are competent in our complaint handling procedures and are regularly monitored against our quality management framework.</p> <p>The Customer Resolution team works independently and impartially.</p> <p>All colleagues complete a declaration of</p> |

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| | | | interest form upon appointment in their role. Declaration of interests are updated and reviewed annually. |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 3.3 | Complaint handlers should: <ul style="list-style-type: none"> <input type="checkbox"/> be able to act sensitively and fairly <input type="checkbox"/> be trained to handle complaints and deal with distressed and upset residents <input type="checkbox"/> have access to staff at all levels to facilitate quick resolution of complaints <input type="checkbox"/> have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | Working as the customer champion, the Customer Resolution team works independently of other teams and are tasked with delivering customer focussed outcomes to complaints. The team manage the relationship with complainants, coordinate complaint investigations and case manage complaints through to resolution. The team are responsible for the final decision on whether complaints should be upheld or not and have the autonomy to agree appropriate resolutions/actions. The team also determine other remedies with complainants such as compensation and goodwill payments. |

Section 4 - Complaint handling principles

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 4.1 | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's | Yes | Attempts to resolve complaints informally are managed via our early resolution |

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| | 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 . | | process. Care is taken throughout the process to ensure that complainants are aware of their right to have their concerns investigated formally. Cases handled via this route are recorded in our housing management system and reported centrally. Early resolution cases must be resolved within 1 business day, after which the matter is automatically escalated to Stage 1 of our complaints process, unless otherwise agreed with the complainant. |
| 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 | Upon receipt of a complaint our case handlers contact complainants via telephone to acknowledge receipt of the complaint, formally introduce themselves, establish a relationship and explain their role. During this introductory conversation the case handler will aim to clarify the grounds for complaint, gather further information required to aid the investigation and agree the desired outcome. The next steps and contact regime will also be agreed. A video call option is also available. |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | Working as the customer champion, the Customer Resolution team works independently and impartially and are tasked with delivering customer focussed resolutions to complaints. The team coordinate complaint investigations and are authorised to make decisions on whether complaints are upheld or not and are responsible for agreeing any corrective |

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| | | | action required to resolve the complaint. The team also have the autonomy to agree compensation and goodwill payments with complainants. |
| 4.7 | <p>The complaint handler must:</p> <ul style="list-style-type: none"> <input type="checkbox"/> deal with complaints on their merits <input type="checkbox"/> act independently and have an open mind <input type="checkbox"/> take measures to address any actual or perceived conflict of interest <input type="checkbox"/> consider all information and evidence carefully <input type="checkbox"/> keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | Through colleague training and several process and system controls, our complaint handlers gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a balanced and consistent approach to case investigations. Operating independently from other teams enables our Customer Resolution team to remain open-minded and impartial. |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | <p>The contact regime is agreed with the complainant during the introductory acknowledgement process which takes place within 2 business days of receipt of the complaint.</p> <p>Automated SMS milestone updates are also utilised to keep complainants informed and up to date with the progress of their complaint and there are multiple channels of communication available between complainant and case handler.</p> |
| 4.12 | <p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> set out their position <input type="checkbox"/> comment on any adverse findings before a final decision is made. | Yes | Our introductory acknowledgement and internal investigation processes provide all interested parties with the opportunity to set out their position and/or submit evidence. |

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| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | The timescales associated with each complaint stage are detailed within our complaint resolution policy. |
| 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 | We would not refuse to escalate a complaint unless it was deemed that the complaint was vexatious or covered by the exclusions within the Complaint Resolution policy. |
| 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 | All information, correspondence and evidence pertaining to complaints is stored within our housing management 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 | Onward has both an Unreasonable Behaviour policy and a Violence and Aggression policy. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | Setting expectations and agreeing the desired outcome with complainants takes place during the introductory acknowledgement process and within 2 business days of receiving the complaint. Our dedicated case handlers maintain regular contact with complainants and provide progress updates as and when the circumstances may change. Any |

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| | | | likely delay to the resolution is communicated as soon as possible. |
| 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 | Complaints are always resolved at the earliest opportunity. If it is likely that a complaint may not be resolved within the timescales outlined in our complaint resolution policy, our case handlers will inform the complainant as soon as they become aware of any likely delay. |
| 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 | Complainants may nominate a representative to deal with the complaint on their behalf. For example, an advocate and/or we have a dedicated mailbox mp-enquiries@onward.co.uk which is used by MP's and Councillors acting on behalf of their constituents. All complaints however received are dealt with in line with our Complaint Resolution policy. |
| 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 | The legal obligations of both parties are always set out to the complainants in our responses, and where necessary, an explanation of the obligation(s) is provided to ensure that the complainant has full understanding. |
| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Colleague/representative confidentiality is always protected. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | Our case handlers utilise several communication methods to ensure complainants remain informed about the progress of their complaint. |

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| <p>4.16</p> | <p>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.</p> | <p>Yes</p> | <p>Prior to closing a complaint our case handlers contact complainants to discuss their findings, communicate the outcome and agree any intended action. The case handler will also confirm that the customer is satisfied with the outcome and the way in which the complaint has been handled prior to closing the case. Upon closure of a complaint, a customer satisfaction survey is issued to the complainant and the feedback received is used to support colleague development and drive continuous learning and improvement activities.</p> |
| <p>4.17</p> | <p>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</p> | | <p>Updates on complaints performance and learning and continuous improvement opportunities are regularly communicated to all colleagues.</p> <p>A cross-functional learning and continuous improvement framework has also been embedded to ensure that colleagues can review, discuss, and learn from complaints.</p> |
| <p>4.19</p> | <p>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.</p> | | <p>Our Unreasonable Behaviour and Violence and Aggression policies ensure that our customers are treated fairly and consistently, whilst at the same time protecting the health, safety, and wellbeing of our colleagues.</p> |

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.1 | Landlords must respond to the complaint <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 | Our complaint response timescales are detailed within our complaint resolution policy. The policy also explains what action will be taken if it is anticipated that there may be a delay in resolving a complaint. |
| 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 | <p>Complaint responses are issued to the complainant as soon as possible and in line with the timescales detailed in our complaint resolution policy.</p> <p>Our case handlers actively manage the progress of any outstanding actions and provide customers with updates as required.</p> <p>A post completion procedure ensures that complainants are contacted after the due date of any action to confirm that they are satisfied with the outcome and authorise for the complaint to be closed.</p> |
| 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 | A structured and bespoke introductory acknowledgement process forms a fundamental part of the investigation process and ensures that all aspects of the complaint are understood at the outset, including the desired outcome. |

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| | | | Case handlers utilise a repository of template email/letter responses to ensure that all information pertinent to a complaint is considered, and any written correspondence is structured in a consistent and customer friendly manner. |
| 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"> <input type="checkbox"/> the complaint stage <input type="checkbox"/> the decision on the complaint <input type="checkbox"/> the reasons for any decisions made <input type="checkbox"/> the details of any remedy offered to put things right <input type="checkbox"/> details of any outstanding actions <input type="checkbox"/> details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | Colleagues are trained and competent in the delivery of all these principles. Our quality management framework ensures that the principles are applied correctly and consistently. A complainant's right to escalate their complaint is included in all complaint correspondence. |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.9 | If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision. | Yes | Section 8 of our Complaint Resolution policy outlines the escalation procedure. In circumstances where a complaint is rejected, an explanation in writing is always provided to the complainant. All complaint correspondence includes details of the Housing Ombudsman Service and the complainants' options in relation to escalating further. |

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| 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 | Upon receipt of a Stage 2 escalation, the introductory acknowledgement procedure is initiated (as per Stage 1). |
| 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 | Section 8 of our Complaint Resolution policy details the escalation process. |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1. |
| 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 | Our complaint response timescales are detailed in our complaint resolution policy. The policy also explains what action we will take if the timescale may not be achieved. |
| 5.16 | <p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <input type="checkbox"/> the complaint stage <input type="checkbox"/> the complaint definition <input type="checkbox"/> the decision on the complaint <input type="checkbox"/> the reasons for any decisions made <input type="checkbox"/> the details of any remedy offered to put things right <input type="checkbox"/> details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> <input type="checkbox"/> if the landlord has a third stage, details of how to escalate the matter to stage three <input type="checkbox"/> if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | Yes | <p>Colleagues are trained to structure their written correspondence in a manner which adopts all these principles.</p> <p>Our quality management framework ensures that the principles are applied correctly and consistently.</p> <p>Onward operates a two-stage process.</p> <p>Details of the Housing Ombudsman service are included in all of our complaint's correspondence.</p> |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Onward operates a two-stage complaints process. |
| 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"><input type="checkbox"/> the complaint stage<input type="checkbox"/> the complaint definition<input type="checkbox"/> the decision on the complaint<input type="checkbox"/> the reasons for any decisions made<input type="checkbox"/> the details of any remedy offered to put things right<input type="checkbox"/> details of any outstanding actions<input type="checkbox"/> details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | N/A | Onward does not operate a third stage. |

Best practice 'should' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | If it is likely that a complaint may not be resolved within the timescales outlined in our Complaint Resolution policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant. |

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| 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 | Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the complaint and the Housing Ombudsman referral process would be initiated. |
| 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 | A comprehensive review of the resident's tenancy/case history is always conducted using our housing management system as standard practice. All available information is utilised when investigating a complaint. |
| 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 | New/additional information or evidence may be submitted at any point during the process. The use of dedicated case handlers and robust communication methods ensures that any new information can be easily shared, reviewed, and considered as part of an open complaint. |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | If it is likely that a complaint may not be resolved within the timescales outlined in our Complaint Resolution policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant. |

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| 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 | Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the complaint and the Housing Ombudsman referral process would be initiated. |
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Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Onward does not operate a third stage. |
| 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 | Onward does not operate a third stage. |

Section 6 - Putting things right

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Resolution outcomes are agreed with complainants prior to a complaint case being closed and our written responses provide a full explanation on what has gone wrong, and the action taken to put things right. |

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| 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 | Our approach to remedies and financial redress is detailed in our Remedies and Financial Redress Guidance . |
| 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 | See Remedies and Financial Redress Guidance. |
| 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 | See Remedies and Financial Redress Guidance. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | See Remedies and Financial Redress Guidance. |
| 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 | See Remedies and Financial Redress Guidance. |

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Yes | Our complaints performance, thematic complaint trends and continuous learning outputs are communicated to all colleagues monthly. Ad-hoc updates |

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| | report and more frequently to their residents, staff and scrutiny panels. | | <p>featuring information such as sector wide news and information such as Housing Ombudsman updates are also communicated to colleagues regularly.</p> <p>A variety of engagement methods are used to share our complaints information with residents such as our Annual Report, Scrutiny panels, and our Customer Complaint Forum.</p> |
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Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | The Executive Director of Operations has lead responsibility for complaints and is a member of the governing body. |
| 7.4 | <p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders <input type="checkbox"/> Regular reviews of issues and trends arising from complaint handling, <input type="checkbox"/> The annual performance report produced by the Ombudsman, where applicable <input type="checkbox"/> 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. | Yes | <p>Quarterly and annual reports are provided to our governing bodies. These reports include detail on the volume of complaints at each stage, our performance, learning outcomes and trend analysis.</p> <p>Additionally, all Housing Ombudsman determinations, case detail and orders are also reported. Where cases of severe maladministration are identified, more intensive reviews are conducted, and management actions are identified and tracked.</p> |

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| | The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | | Our Audit and Risk framework includes the annual self-assessment against the code. |
| 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 | Senior management teams receive the detailed complaints performance, insight, and analysis on a monthly and quarterly basis, through our reporting and governance work. This enables the organisation to identify trends and take action. We have implemented a framework that ensures learning outcomes are shared and inform action and training for both colleagues and contract partners. |
| 7.6 | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <input type="checkbox"/> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments <input type="checkbox"/> take collective responsibility for any shortfalls identified through complaints rather than blaming others <input type="checkbox"/> act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes | Onward has several performance indicators that help drive the culture required to meet the standards set out in the Housing Ombudsman's code and set by the Chartered Institute of Housing. |

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 | Our compliance with the Complaint Handling Code is continuously evaluated. Our previous self-assessment can be |

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| | | | viewed here . |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | As above. |
| 8.3 | <p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <input type="checkbox"/> 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 <input type="checkbox"/> publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents <input type="checkbox"/> include the self-assessment in their annual report section on complaints handling performance | Yes | <p>The governing body receives an update on the outcome of our self-assessment through our formal Annual Complaints Report.</p> <p>We publish the self-assessment on our website and include in our customer annual reports.</p> |