

## Self-Assessment of the Housing Ombudsman's Complaint Handling Code

Compliance with the Complaint Handling Code					
1	Definition of a complaint	Yes	No	Comments	Actions
	<p>Does the complaints process use the following definition of a complaint?</p> <p><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></p>	Yes		<ul style="list-style-type: none"> <li>The Housing Ombudsman definition of a complaint will be adopted and embedded within Onwards complaints policy and process.</li> </ul>	<ul style="list-style-type: none"> <li>The Onward Complaint Resolution Policy was reviewed by the Onward Customer Complaint Forum 03/02/21.</li> <li>Our Complaint Resolution Policy has been published on our website and can be viewed <a href="#">here</a></li> </ul>
	Does the policy have exclusions where a complaint will not be considered?	Yes		<ul style="list-style-type: none"> <li>Details of the exclusions are contained within Onwards Complaint Resolution policy</li> </ul>	<ul style="list-style-type: none"> <li>No additional action required</li> </ul>
	<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon</p>	Yes		<ul style="list-style-type: none"> <li>Our exclusions are driven by factual circumstances, preventing inconsistency and/or subjectivity in the event of a complaint refused</li> </ul>	<ul style="list-style-type: none"> <li>The Onward Complaint Resolution Policy was reviewed by the Onward Customer Complaint Forum 03/02/21. No changes to exclusions recommended</li> </ul>
<b>2</b>	Accessibility				
	Are multiple accessibility routes available for residents to make a complaint?	Yes		<ul style="list-style-type: none"> <li>Onwards Complaint Resolution policy details the multiple routes available to customers when making a complaint</li> </ul>	

	Is the complaints policy and procedure available online?			<ul style="list-style-type: none"> <li>Onwards Complaint Resolution policy is available on our website under the 'policies' and the 'contact us' sections</li> </ul>	
	Do we have a reasonable adjustments policy?	<b>YES</b>		<ul style="list-style-type: none"> <li>Onward always complies with the Equality Act 2010 but does not have a stand-alone Reasonable Adjustments policy. Instead, the following policies contain details of the reasonable adjustments available: <ul style="list-style-type: none"> <li>a. Repairs handbook (adaptations to homes)</li> <li>b. Equality and Diversity policy (our equality objectives)</li> <li>c. Customer charter (tailoring our services)</li> <li>d. Tenant handbook (adaptations to homes, and providing extra support to vulnerable customers)</li> <li>e. Adaptations policy (See page 12, 13)</li> </ul> </li> </ul>	
	Do we regularly advise residents about our complaints process?	<b>Yes</b>		<ul style="list-style-type: none"> <li>We promote our early intervention and escalation process to customers where we identify they are experiencing issues, or if we believe that an issue requires escalation on their behalf, but we recognise that there are opportunities for a more proactive approach</li> </ul>	<ul style="list-style-type: none"> <li>In 2021 we will increase our proactive engagement with customers by publicising our customer resolution process via our newsletters, our complaints forum, and our website</li> </ul>
<b>3</b>	Complaints team and process				
	Is there a complaint officer or equivalent in post?	<b>Yes</b>		<ul style="list-style-type: none"> <li>We have a dedicated Customer Resolution Team and Team Leader</li> </ul>	
	Does the complaint officer have autonomy to resolve complaints?	<b>Yes</b>			

			<ul style="list-style-type: none"> <li>The Customer Resolution team work independently of the other teams and are tasked with delivering customer focussed resolutions. The team coordinate the investigations and case manage complaints through to resolution. The team also have the autonomy to agree compensation and goodwill payments with customers</li> </ul>	
Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	<b>Yes</b>		<ul style="list-style-type: none"> <li>The team ensure complaints are resolved and are able to contact other departments to resolve disputes. This is actively supported by senior managers</li> </ul>	<ul style="list-style-type: none"> <li>Our senior leadership team continue to drive and embed our approach to complaints and dispute resolution</li> <li>Several initiatives are planned to strengthen this further in 2021. These include: <ul style="list-style-type: none"> <li>Continuous learning</li> <li>Improved reporting</li> <li>Continued tracking and management</li> </ul> </li> </ul>
If there is a third stage to the complaint's procedure are residents involved in the decision making?			<ul style="list-style-type: none"> <li>Onward operate a two-stage complaints process</li> </ul>	
Is any third stage optional for residents?			<ul style="list-style-type: none"> <li>N/A as no third stage</li> </ul>	
Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	<b>Yes</b>		<ul style="list-style-type: none"> <li>Our stage 2 correspondence template provides details to customers regarding their right to refer matters to the Housing Ombudsman Service</li> <li>We have also taken the step to include the Housing Ombudsman's services and contact details in our initial</li> </ul>	

			acknowledgement and stage 1 correspondence templates	
	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes	<ul style="list-style-type: none"> <li>All complaint information including verbal and written correspondence to and from customers is recorded on our CRM system</li> </ul>	
	At what stage are most complaints resolved?		<ul style="list-style-type: none"> <li>Stage 1</li> </ul>	
<b>4</b>	Communication			
	Are residents kept informed and updated during the complaints process?	Yes	<ul style="list-style-type: none"> <li>Our Customer Resolution Specialists case manage each complaint from receipt through to resolution. Each Specialist maintains regular communication throughout the journey of the complaint and records each interaction on our system</li> </ul>	
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	Yes	<ul style="list-style-type: none"> <li>Onward operate a that allows this process as part of stage one of the complaints process. This ensures that the customer is aware of the outcome prior to final confirmation being provided in writing. This enables customers to challenge the outcome before the final decision.</li> </ul>	
	Are all complaints acknowledged and logged within five days?	Yes	<ul style="list-style-type: none"> <li>Our internal service level is to log and acknowledge all complaints within 2 days</li> </ul>	
	Are residents advised of how to escalate at the end of each stage?	Yes	<ul style="list-style-type: none"> <li>Our correspondence templates include details of how customers can escalate their complaint at each stage – this includes</li> </ul>	

			details of the Housing Ombudsman services	
	What proportion of complaints are resolved at stage one?		<ul style="list-style-type: none"> <li>For the period 2019/20 98% of complaints were resolved at Stage 1</li> </ul>	
	What proportion of complaints are resolved at stage two?		<ul style="list-style-type: none"> <li>For the period 2019/20 77% of stage 2 complaints are resolved without further escalation (of 56 stage 2 complaints, 13 escalated to the Housing Ombudsman)</li> </ul>	
	<p>What proportion of complaint responses are sent within Code timescales?</p> <ul style="list-style-type: none"> <li>Stage one Stage one (with extension)</li> <li>Stage two Stage two (with extension)</li> </ul>		<p>For the period 2019/20.</p> <p>Stage 1 = 57.4% sent within 10 days Stage 2 = 52.8% for 2019/20 sent within 10 days</p> <p>For the period 2020/21.</p> <p>Stage 1 = 68.1% as of Oct 2020 Stage 2 = 61.1% as of Oct 2020</p>	
	Where timescales have been extended did we have good reason?	<b>Yes</b>	<ul style="list-style-type: none"> <li>Every effort is made to respond to complaints quickly and effectively. Where we anticipate there may be a delay and an extension is required, we advise our customer of the delay, explain the reason for the delay and agree a further timescale and contact arrangements.</li> <li>Timescale extensions are very much the exception, but circumstances such as the complex nature of a complaint, factors beyond our control, or inability to contact customers may require an extension</li> <li>Monitoring of extensions is incorporated within our quality management framework</li> </ul>	

	Where timescales have been extended did we keep the resident informed?	Yes		<ul style="list-style-type: none"> <li>• Yes</li> </ul>	
	What proportion of complaints do we resolve to residents' satisfaction			<ul style="list-style-type: none"> <li>• The introduction of a customer satisfaction survey in relation to our complaints service was introduced in Q3 2020/21</li> </ul>	
<b>5</b>	Cooperation with Housing Ombudsman Service				
	Were all requests for evidence responded to within 15 days?	Yes		<ul style="list-style-type: none"> <li>• Historically, not all requests to provide evidence to the Housing Ombudsman have been responded to within 15 days. We identified that this was due to Ombudsman cases being managed manually and independently of the Onward system. Ombudsman cases are now managed and reported via our system providing greater visibility of cases and improved management</li> </ul>	<ul style="list-style-type: none"> <li>• We continue to closely monitor our service level performance in this area and report no failures since the new reporting functionality was introduced</li> </ul>
	Where the timescale was extended did we keep the Ombudsman informed?			<ul style="list-style-type: none"> <li>• We have identified a learning opportunity in relation to our engagement with the Ombudsman where timescale extensions are required.</li> </ul>	<ul style="list-style-type: none"> <li>• System and process based improvements have ensured that proactive and prompt action is now taken where SLA timescales are near to expiry</li> </ul>
<b>6</b>	Fairness in complaint handling				
	Are residents able to complain via a representative throughout?	Yes		<ul style="list-style-type: none"> <li>• Details are contained within our Complaint Resolution Policy</li> </ul>	
	If advice was given, was this accurate and easy to understand?	Yes		<ul style="list-style-type: none"> <li>• Our Customer Escalation Specialists aim to liaise with customers via telephone to improve the communication process. Our colleagues refrain from using jargon and</li> </ul>	

				use a standard response template to ensure all information is cascaded in a structured, comprehensive, and easy to understand format. Our colleague's communication with customers is regularly audited as part of our quality management framework to ensure consistency and effectiveness.	
	How many cases did we refuse to escalate?  What was the reason for the refusal?	Yes		<ul style="list-style-type: none"> <li>The period 2019/20 = 1</li> <li>The reason for the refusal to escalate was due to the vexatious nature of the complaint</li> </ul>	
	Did we explain our decision to the resident?	Yes		<ul style="list-style-type: none"> <li>Yes</li> </ul>	
<b>7</b>	<b>Outcomes and remedies</b>				
	Where something has gone wrong are we taking appropriate steps to put things right?	Yes		<ul style="list-style-type: none"> <li>Within our complaint outcome responses, Onward always offer an apology and provide confirmation of whether the complaint is upheld or not. Additionally, Onward provides details to the customer regarding our investigation, our findings and how we intend to remedy the issue.</li> <li>Onward adopt the Ombudsman guidance on remedies and also utilise an internal compensation and goodwill policy to</li> </ul>	<ul style="list-style-type: none"> <li>Our senior leadership team is leading developing and embedding a continuous improvement culture</li> <li>There are a number of initiatives currently being developed to improve in this area such as:</li> </ul>

			ensure fairness and consistency when determining financial remedy	<ul style="list-style-type: none"> <li>- We have established a complaints improvement programme of work</li> <li>- We have established a customer engagement forum focussed on complaints</li> <li>- In Q4 2020/21, we will implement a continuous improvement framework</li> </ul>
<b>8</b>	Continuous learning and improvement			
	What improvements have we made as a result of learning from complaints?	<b>Yes</b>	<p>Since the implementation of our complaint's improvement plan in Q1 2020/21 our complaints handling performance has improved:</p> <p>Stage 1 2019/20 = 57.4% resolved within 10 days  Stage 1 2020/21 = 68.1% resolved within 10 days (as at Oct 2020)</p> <p>Stage 2 2019/20 = 52.8% resolved within 10 days  Stage 2 2020/21 = 61.1% resolved within 10 days (as at Oct 2020)</p> <p>Stage 1 2019/20 average days to resolve = 13.8  Stage 1 2020/21 average days to resolve = 12.7 (as at Oct 2020)</p> <p>Stage 2 2019/20 average days to resolve = 13.2</p>	<ul style="list-style-type: none"> <li>• We have implemented a Customer Complaints Forum in which will provide a forum for customers to review, discuss and input into the ongoing development of our complaint handling service</li> </ul>



			<p>Stage 2 2020/21 average days to resolve = 16.6 (as at Oct 2020)</p> <ul style="list-style-type: none"> <li>• We have introduced a Customer Escalation Team within our Contact Centre, ensuring complaints are resolved informally at the first point of contact wherever possible.</li> <li>• To ensure the highest quality of complaint resolution, we have implemented a quality management framework.</li> <li>• We now conduct customer satisfaction surveys on customers who have submitted a complaint to better understand their how they perceive our complaint handling service.</li> <li>• We have reviewed our compensation guidance in line with Housing Ombudsman remedies guidance</li> </ul>	
	<p>How do we share these lessons with:</p> <p>a) residents?</p> <p>b) the board/governing body?</p> <p>c) In the Annual Report?</p>	Yes	<ul style="list-style-type: none"> <li>• Annual complaints report</li> <li>• Scrutiny and internal reporting structures</li> <li>• Performance Reporting to Board</li> </ul>	
	<p>Has the Code made a difference to how we respond to complaints?</p>	Yes	<ul style="list-style-type: none"> <li>• Prior to the publication of the Code, Onward had implemented a complaints improvement plan. However, the Code, and in particular, the self-assessment exercise, has provided a framework by</li> </ul>	

			which Onward can ensure that we continue to deliver and evolve our complaint handling service.	
	What changes have we made?	Yes	<ul style="list-style-type: none"> <li>• We have adopted the Housing Ombudsman complaint definition. This has provided clarity for our colleagues and customers</li> <li>• We have reviewed and improved our Complaint Resolution Policy</li> <li>• We are introducing a customer forum</li> <li>• We now provide greater visibility to customers regarding the Housing Ombudsman services and contact details</li> </ul>	

## **Repairs handbook**

### **Adapting your home to meet your needs.**

Sometimes ill health or a change in circumstance means your home is no longer suitable for you. In situations like this it may be possible to adapt your home to better suit your needs, such as installing a ramp or adding grab rails to your bathroom, for example. We will always try to accommodate these requests, working alongside our local authority partners. Adaptations may not always be possible, and depend on a variety of factors such as your specific needs and the type of property you live in. For advice and support on adapting your home to make it safer and more convenient for you or a family member, contact us on 0300 555 0600

## **Equality and Diversity Policy**

### **Onwards equality objectives**

We will adapt and shape our service provision to meet the needs of our customers – we will create opportunities for our customers to influence our services developing our approach to customer insight and engagement. We will carry out and act on Equality Impact Assessments to ensure we meet diverse needs

## **Customer charter**

### **Tailoring our services**

We recognise that some of our customers have levels of vulnerabilities, we will therefore:

- Take account of any particular needs you may have and try to accommodate them
- Provide solutions for those who are hard of hearing or whose first language may not be English
- Refer you to the most appropriate member of staff if you need specialist advice

## **Tenant handbook**

### **Adapting your home to work for you**

Onward provides an aids & adaptation service to help our tenants live safely and more independently in their homes. Aids & adaptations are changes we can make to your home to help you, or a member of your household, continue to live independently. For example, they might make it easier to get in and out of your home, get up and down stairs or use your bathroom. Please bear in mind that, although we will try to accommodate requests where we can, it

may not always be possible to adapt your home. You also need to have been a tenant for a minimum of 12 months and your rent account must be up to date.

#### **Extra support when you need it**

We can provide one-to-one housing-related support to vulnerable customers. We are able to give short-term interventions of up to two years to help any of our tenants needing a helping hand in order to regain their independence and fully manage their tenancies.

We work with each tenant to figure out their specific requirements and create a plan tailored to their needs, which will be reviewed on a regular basis. This will include what tasks need to be undertaken, by who and within what timescale

#### **Adaptations policy**

Policy is specific to adaptations