# Appendix A: Self-assessment form

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** | **Evidence** | **Commentary / explanation** |
| --- | --- | --- | --- | --- |
| 1.2 | A complaint must be defined as:*‘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.’*  | Yes | We adopted the Housing Ombudsman’s definition of a complaint when the code was first introduced in July 2020. The definition is included in our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf) (section 4 – Complaints Definition) |  |
| 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 | See evidence in section 1.2 above. Compliance with the second part is included in our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf) (Section 1 and 17). |  |
| 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 recorded, monitored and reviewed regularly. | Yes | Service Requests are set out within our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf) (Section 5). | We have had two cases in 2023/24 where the HOS has contacted Plus Dane on behalf of customers where complaints were managed as service requests. In both cases the HOS requested a complaint be opened and provided feedback on why they felt the contact should have been treated as a complaint. This highlighted the need for improved assurance relating to the recording of occasions where a complaint is determined to be a service request. This requires system changes to include additional closure reasons. Action to be addressed as part of change to central led function. |
| 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 | Complaints can be raised before a service request has been completed. Ongoing service requests are not listed as an exclusion under Section 7 of our Customer Complaints and Feedback Policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). | Service improvement set out in section 1.4 will improve monitoring of the relationship between service requests and complaints. |
| 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 | Dissatisfaction expressed via transactional surveys is not defined as a complaint. Each service area is responsible for contacting the customer to determine what is required to resolve the issue and if appropriate it may be logged as a complaint. Wider surveys, such as our TSM survey, include details of how complaints can be raised. | Screenshot of TSM survey – highlighted section includes link to complaints |

# 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 | We accept complaints unless there is a valid reason not to do so. Our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf) in section 7 sets out the circumstances in which a matter will not be considered. Complaint rejection [letter templates](https://plusdane.interactgo.com/Utilities/Uploads/Handler/Uploader.ashx?area=composer&filename=Complaint+Rejection+Letter_new+template+2024.docx&fileguid=be47606f-c8dc-4300-8ff2-65c22df8f2e1) (internal link only) include reference to the relevant section of the policy. Rejections are reviewed monthly, and a summary provided in the annual complaint review. In 2023/2024 there were 4 rejections in the year. | See additional commentary in section 1.4 relating to complaints determined to be service requests.  |
| 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:* 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.
* Matters that have previously been considered under the complaints policy.
 | Yes | We accept complaints unless there is a valid reason not to do so. Our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf) in section 7 clearly sets out the circumstances in which a matter will not be considered.Escalations will be accepted, unless the issue relates to those listed as exclusions to the 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 | In line with the updated Complaint Handling Code (1 April 2024), our timeframe has been extended from 6 months to 12 months. See section 7 of our policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf). | Discretion will be applied when there is good reason to do so. Complaint officers receive training on how to apply policy, and complaint rejections are now quality checked on a monthly basis to ensure appropriate application. |
| 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 | Complaint rejection [letter templates](https://plusdane.interactgo.com/Utilities/Uploads/Handler/Uploader.ashx?area=composer&filename=Complaint+Rejection+Letter_new+template+2024.docx&fileguid=be47606f-c8dc-4300-8ff2-65c22df8f2e1) (internal link only) are stored on Intro for use by CRT and include reference to the relevant section of the policy.The letter template includes the contact details of the Housing Ombudsman to support the customer. |  |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Each complaint is reviewed and assessed by a Complaint Resolution Officer on its own merit. |  |

# Section 3: Accessibility and Awareness

| **Code provision** | **Code requirement** | **Comply** | **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 | There are multiple for customers to contact us:Digital channels:* via an [online form](https://www.plusdane.co.uk/contact-us/feedback-and-complaints/) on our website
* by email to complaints@plusdane.co.uk
* through our [Customer Portal](https://www.plusdane.co.uk/media/ehpj4vrx/portal-faq-s.pdf)
* via social media, for example Facebook or Twitter

Non-digital channels:* through a Plus Dane colleague
* during office or home visits
* by calling 0800 169 2988
* in writing to our registered Head Office
* by completing the form on the back of our [complaint leaflet](https://www.plusdane.co.uk/media/patd4x12/customer-complaint-leaflet_may-2023-final.pdf) which can be printed out by colleagues or customers
 | There is an opportunity to strengthen our performance in this area by improving data collection relating to the use of each channel to assess effectiveness.  |
| 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 | The all-colleague induction programme launched in March 2024 and includes an overview of the complaints process. All new colleagues attend the induction within their first three months of joining.[Full guidance](https://plusdane.interactgo.com/page/2281) is readily available on Intro (the Plus Dane intranet site – link only accessible internally) |  |
| 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 | Volumes of complaints are reported in line with Tenant Satisfaction Measure (TSM) requirements and reported to the Board annually. | We do not have an objective to reduce volumes of complaints. Volumes are considered alongside other indicators to provide a rounded view of complaint handling and service provision. |
| 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 | A dedicated [page on our website](https://www.plusdane.co.uk/contact-us/feedback-and-complaints/?accordion=additional-info) consolidates all of our complaints information for customers, including * Our Customer Complaints and Feedback Policy [here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf).
* the policy has been [translated in to an accessible format](https://www.plusdane.co.uk/media/patd4x12/customer-complaint-leaflet_may-2023-final.pdf) for all customers.
 |  |
| 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 | Section 14 of our Customer Complaints and Feedback Policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)) provides details of how we will publicise the policy and information relating to the Ombudsman. | The policy contains reference to how we publicise the policy via means other than the website in order to reach the widest audience. |
| 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 | Section 24 of our Customer Complaints and Feedback Policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)) explains that reasonable adjustments, such as support from a third party, will be accommodated. |  |
| 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 | All [complaint response letters](https://plusdane.interactgo.com/page/2283) (internal link only). include the contact details of the Housing Ombudsman service, along with an explanation that the service can provide support at any stage. Our [dedicated complaints webpage](https://www.plusdane.co.uk/contact-us/feedback-and-complaints/?accordion=if-you-re-not-satisfied-with-our-response) provides information for customers on their right to contact the Housing Ombudsman Service. |  |

# Section 4: Complaint Handling Staff

| **Code provision** | **Code requirement** | **Comply** | **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 | Responsibility for Complaint Handling sits with our Customer Relations Team (CRT). The team consists of a manager, a senior officer and four officers. Complaint performance is reported via the Director of Customer Experience  | A new structure for the team was introduced as of 25 March 2024 as part of our commitment to delivering positive complaint handling. |
| 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 | Officers have access to all levels of colleagues across the organisation. Training is provided to ensure that officers are empowered to resolve disputes promptly and fairly.  |  |
| 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 | Complaints are considered a core service within the organisation. | After commissioning a taskforce to review complaint handling and the culture of complaints, Executive Management Team approved additional resources to ensure the service is effective. |

# Section 5: The Complaint Handling Process

| **Code provision** | **Code requirement** | **Comply** | **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 | There is one single policy for complaints covered by the Code.Making a complaint should not lead to different treatment for a customer.  | Under the new complaints model, there will be clearer sight of complaint outcomes to further foster the positive culture of welcoming complaints as an opportunity to learn. |
| 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 | Our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)) does not include a stage 0 or an informal complaint stage. It sets out our approach to provide early resolution where possible in line with the Housing Ombudsman guidance. |  |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | Our process has two stages. |  |
| 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 | Customers are not expected to go through two complaint processes.To ensure swift resolution of complaints, customers are signposted to the correct route for complaints at the earliest opportunity. E.g., for complaints relating to Choice Based Lettings. |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | We deliver the end-to-end complaints management and will seek contribution/explanation from third parties.  |  |
| 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 to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.  | Yes | Our complaint acknowledgment letters at stage 1 and stage 2 set out our understanding of the complaint. Customers are asked to tell us if the summary of their concerns captures the nature of their complaint appropriately. If any aspect is unclear, complaint officers will ask for further clarification. |  |
| 5.7 | 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.   | Yes | This information is clearly set out within our letters. |  |
| 5.8 | At each stage of the complaints process, complaint handlers must:  1. deal with complaints on their merits, act independently, and have an open mind;
2. give the resident a fair chance to set out their position;
3. take measures to address any actual or perceived conflict of interest; and
4. consider all relevant information and evidence carefully.
 | Yes | All complaint officers complete the Housing Ombudsman Service online learning relating to complaint handling. This ensures that they can apply the principles of complaint handling as set by the HOS. | Training records are held on iTrent. |
| 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 | Customers are kept informed about the progress of their complaint. These updates are recorded on our housing management system. | 78% of all stage 1 complaints and 28.7% of stage 2 were resolved within timescales Stage 2 performance is calculated on same day acknowledgement and resolution within 20 days in line with the timescales of the 2023/24 code. The HOS amended these stage 2 timescales in the April 2024 update to allow 5 working days for an acknowledgement and a further 20 working day extension for complex complaints. |
| 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 | We will make reasonable adjustments as appropriate, as set out within section 24 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). Records of disability or vulnerabilities are recorded on our housing management system. | Our EDI action plan includes steps we are taking to improve processes relating to the collating, use and review of information disclosed by customers. |
| 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 | There are no restrictions included on escalating a complaint through the complaints procedure. |  |
| 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 | Complaint handling information is stored within our housing management system.Elements of asset information and surveys are stored on separate systems. | Our Homes project is looking at ways to better integrate asset related data to the central housing management system. |
| 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 | All remedies are available at each stage of the complaint process. |  |
| 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 | The framework is available on our website ([here](https://www.plusdane.co.uk/media/3sghueqt/nei-frm-03-01-unreasonable-behaviour-framework-1.pdf)). |  |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.  | Yes | Action will be appropriate and with regard to all legal provisions. |  |

# Section 6: Complaints Stages

**Stage 1**

| **Code provision** | **Code requirement** | **Comply** | **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 | Initial triaging of the complaint is completed by CRT. This includes discussion with the customer to identify opportunities for early resolution.  | The transition to a new model will further strengthen our approach to prompt resolution of complaints through end to end ownership by the complaint officer. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.  | Yes | This is set out within section 11 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). | This figure is different to the Tenant Satisfaction Measure (TSM) relating to complaint timescales. Published TSM measures include low-cost rental accommodation only, and are calculated across all complaint stages. The performance in this self-assessment looks at each stage in line with the requirements listed. |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.   | Yes | This is set out within section 11 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). Where additional | See 6.2 |
| 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 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.   | Yes | This is set out within section 11 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). See 6.3Communication relating to extensions is recorded within the housing management system. | There is an opportunity through system developments to increase oversight and reporting of extensions reasons and timescales. This will be explored as part of the transition to the new model. |
| 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 | Extension letters include contact details of the Ombudsman.Letter template is available on the intranet [here](https://plusdane.interactgo.com/Utilities/Uploads/Handler/Uploader.ashx?area=composer&filename=Complaint+Extension+Template_202205.docx&fileguid=e156ee99-d583-4fd4-a127-750a0ba72267). (internal link only) |  |
| 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 | Responses are provided once investigations are complete, and remedies agreed. Any outstanding actions identified are recorded on the housing management system. | The improved oversight that will be delivered through the new complaint service model will provide further support in the timely tracking and updating of agreed actions. |
| 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 | Our letters set out the complaint definition and our responses provide reasons for the decision.  | Additional measures to ensure compliance with this requirement are in place until the new complaint model is fully embedded. This includes a review of all stage 2 investigations by the Executive Management Team.  |
| 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 | Our [internal complaints guidance](https://plusdane.interactgo.com/Utilities/Uploads/Handler/Uploader.ashx?area=composer&filename=Complaint+Handling+Guidance.pdf&fileguid=c2a542fd-40b9-4d80-8014-8cff913b3f6f) (internal link only) states:“If the customer raises new issues whilst you are investigating the complaint you should either incorporate them into the complaint if it makes sense to do so and you are able to resolve the query or raise another complaint if the issue is unrelated or requires further investigation.” | Training of new CRT colleagues a part of the transition presents an opportunity to ensure that any additional issues raised are referenced with clarity and transparency for customers. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
 | Yes | Our letter templates set out these requirements. The Plus Dane [tone of voice](https://plusdane.interactgo.com/page/2227?SearchId=312327) (internal link only) sets out our approach to clear, plain language. | Following approval of our new corporate plan and the customer experience strategy, there is an opportunity to refresh awareness of the Plus Dane tone of voice to ensure consistency of communication with customers across all contacts. |

**Stage 2**

| **Code provision** | **Code requirement** | **Comply** | **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 | Our complaints process has two stages only. |  |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint’s procedure within five working days of the escalation request being received.  | Yes | This is set out within section 12 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). | If acknowledgment is delayed, the timescale for responding is adjusted wherever possible to account for the delay, so that customers still receive a response within a total of 25 working days of escalating a complaint. If this is not possible the delay is explained to the customer and addressed within the complaint response. |
| 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 | There is no requirement within our policy for customers to explain their reasons for requesting a consideration. Contact is made with the customer to better understand why they remain unhappy so that a full and appropriate response can be provided. |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.  | Yes | This is set out within section 12 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)).Stage 2 complaints are assigned to a Head of Service level or above and are not investigated by the same person who considered the stage 1. | Additional measures relating to stage 2 reviews are in place until the new complaint model is fully embedded. All stage 2 investigations have a final review by the Executive Management Team.  |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.   | Yes | This is set out within section 12 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)). | This figure is different to the Tenant Satisfaction Measure (TSM) relating to complaint timescales. Published TSM measures include low-cost rental accommodation only, and are calculated across all complaint stages. The performance in this self-assessment looks at each stage in line with the requirements listed. |
| 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 | This is set out within section 12 of our policy ([here](https://www.plusdane.co.uk/media/pcelvzn5/nei-pol-01-04-complaints-policy.pdf)).Any extensions to deadlines are discussed with customers and recorded on our housing management system. |  |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes | The details are included within our extension letter template. |  |
| 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 | See point 6.6 |  |
| 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 | Our letters set out the complaint definition and our responses provide reasons for the decision.  | Additional measures to ensure compliance with this requirement are in place until the new complaint model is fully embedded. This includes a review of all stage 2 investigations by the Executive Management Team.  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.
 | Yes | Our letter templates set out these requirements. The Plus Dane [tone of voice](https://plusdane.interactgo.com/page/2227?SearchId=312327) (internal link only) sets out our approach to clear, plain language. | Following approval of our new corporate plan and the customer experience strategy, there is an opportunity to refresh awareness of the Plus Dane tone of voice to ensure consistency of communication with customers across all contacts. |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | There are only 2 stages in our complaint process. |  |

# Section 7: Putting things right

| **Code provision** | **Code requirement** | **Comply** | **Evidence** | **Commentary / explanation** |
| --- | --- | --- | --- | --- |
| 7.1 | 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: * Apologising;
* Acknowledging where things have gone wrong;
* Providing an explanation, assistance or reasons;
* 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.
 | Yes | Our [internal complaint handling guidance](https://plusdane.interactgo.com/Utilities/Uploads/Handler/Uploader.ashx?area=composer&filename=Complaint+Handling+Guidance.pdf&fileguid=c2a542fd-40b9-4d80-8014-8cff913b3f6f) (internal link only) provides colleagues with direction on the ways that things can be put write.All complaint officers must complete the Housing Ombudsman Service e-learning on the principles of complaint handling. | Training records are stored on iTrent. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes | See 7.1 |  |
| 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 | Our letter templates clearly set out the way in which remedies must be explained.Any outstanding actions identified are recorded on the housing management system. | The improved oversight that will be delivered through the new complaint service model will provide further support in the timely tracking and updating of agreed actions. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | Our compensation framework is drafted with consideration of the guidance issued by the Ombudsman. | The new complaints model provides an opportunity to conduct effectiveness reviews of the compensation framework quarterly to ensure emerging gaps are identified and addressed in a timely manner. |

# Section 8: Putting things right

| **Code provision** | **Code requirement** | **Comply** | **Evidence** | **Commentary / explanation** |
| --- | --- | --- | --- | --- |
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
2. 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;
3. any findings of non-compliance with this Code by the Ombudsman;
4. the service improvements made as a result of the learning from complaints;
5. any annual report about the landlord’s performance from the Ombudsman; and
6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
 | Yes | This is published on our [website](https://www.plusdane.co.uk/contact-us/feedback-and-complaints/?accordion=additional-info) |  |
| 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 | Each year, the information is published to the [website](https://www.plusdane.co.uk/contact-us/feedback-and-complaints/?accordion=additional-info).The 2023/24 review will be uploaded following Board approval and by the 30 June. |  |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | A further self-assessment will be completed once the transition to the new model is complete. It is anticipated this will be within quarter 3 of 2024/25. |  |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | n/a | Requirement of the code noted. We will comply with Ombudsman requests. |  |
| 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. | n/a | Requirement of the code noted. | This requirement will be added to the appropriate Business Continuity plans to ensure it is delivered in times of crisis. |

# Section 9: Scrutiny & oversight: continuous learning and improvement

| **Code provision** | **Code requirement** | **Comply** | **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 | Examples of wider learning is included within the annual summary published alongside this self-assessment.  | The recently approved customer experience strategy includes an action to introduce learning loops into the organisation to further enhance service improvements. |
| 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 | See 9.2 |  |
| 9.3 | 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.  | Yes | See 9.2Learnings are reported to Committee on a quarterly basis and shared regularly with the Customer Assurance Panel. Updates and feedback are shared with colleagues through specific feedback, case studies and wider communications shared on internal channels. |  |
| 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 complaints handling function (CRT) report to the Director of Customer Experience who is accountable for complaint handling |  |
| 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 complaint handling culture. This person is referred to as the Member Responsible for Complaints (‘the MRC’). | Yes | A member of the governing body is appointed as the Member Responsible for Complaints. |  |
| 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 | An individual Board member is identified as having responsibility for complaint oversight. | A role profile has been drafted to provide further clarity around roles and responsibilities to ensure the role is fully embedded into the overall approach to scrutiny and challenge of this service area. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: 1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
2. regular reviews of issues and trends arising from complaint handling;
3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and
4. annual complaints performance and service improvement report.
 | Yes | These are provided to Purpose Committee quarterly and evidenced by committee packs and minutes. |  |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: 1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
3. act within the professional standards for engaging with complaints as set by any relevant professional body.
 | Yes | This is currently delivered via the [Plus Dane behavioural competency framework](https://www.plusdane.co.uk/join-our-team/why-join-us/?accordion=opportunities) which sets out these requirements for all colleagues within the organisation in how they conduct themselves. | At present the PDR cycle in Plus Dane runs from September. Following the inclusion of this requirement in the 1 April 2024 code revision, an objective will be proposed to the Executive Management in quarter 2 in preparation for the next PDR cycle. |