

Housing Ombudsman Complaint Handling Code Compliance Self-Assessment

1 October 2020 – 30 September 2021

Compliance with the Complaint Handling Code			
1	Definition of a complaint	Yes	No
	<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	
	<p>Does the policy have exclusions where a complaint will not be considered?</p> <p>Exclusions are:</p> <ul style="list-style-type: none"> • an initial request for service, information or an explanation of how a decision has been made or where customer is telling us about a problem for the very first time (unless that relates to staff behaviour) • anti-social behaviour unless the complaint refers to our failure to deal with the matter appropriately • disputes against the amount of rent or service charge being charged • a claim for damages or personal injury which will be dealt with as an insurance claim • matters where legal proceedings have been started or concluded • matters relating solely to services or decisions outside of our control • attempts to reopen or reconsider complaints where we have provided our final decision • demoted tenancy appeals • where we have special arrangements in place with a customer, in line with our Unacceptable Actions and Behaviour Policy • complaints which are being pursued in an unreasonable manner including frivolous or vexatious complaints • temporary business or service closures/outages (including digital services) due to unforeseen circumstances or logistical reasons or any other force majeure event that impacts service delivery 	Yes	

	<ul style="list-style-type: none"> • where the issue took place more than six months ago (however discretion can be applied where there is a valid reason for the delay) 		
	<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon: The exclusions are considered reasonable and fair e.g. matters outside of our control; issues subject to legal proceedings; complaints being pursued unreasonably; that relate to matters over six months old although discretion can be applied.</p>	Yes	
2	Accessibility		
	<p>Are multiple accessibility routes available for residents to make a complaint?</p> <p>As we want our complaints process to be easy and accessible, complaints can be made in any way (e.g. social media/email/text/telephone/in person/in writing and through a representative or advocate where consent has been provided)</p>	Yes	
	Is the complaints policy and procedure available online?	Yes	
	<p>Do we have a reasonable adjustments policy?</p> <p>Examples could include:</p> <ul style="list-style-type: none"> • the provision of auxiliary aids • the provision of information in appropriate alternative formats e.g. large print, Braille, coloured paper • the reasonable extension of time limits e.g. to request the escalation of a complaint • the provision of correspondence in a larger font size • the use of email or the telephone in preference to hard copy letters where appropriate which may assist those with a visual impairment • speaking clearly to our customers with the offer of additional time to cover the issues they need to discuss • using plain English appropriate to the person we are dealing with and avoiding jargon • arranging meetings in rooms that have appropriate facilities • rest and comfort breaks in meetings • communicating with people through their representative if requested and approved by them 	Yes	

	<ul style="list-style-type: none"> • arranging home visits for those who have particular mobility difficulties • communicating with people through their representative (whether or not this is a legal representative) or advocate, if requested and approved by them 		
	<p>Do we regularly advise residents about our complaints process?</p> <p>Our complaints policy including the process is available on our website and we will include details of the process in our annual report. Dissatisfied customers are advised of the process on calls, via email exchange, web chat or direct messages on social media and in complaint responses.</p>	Yes	
3	Complaints team and process		
	<p>Is there a complaint officer or equivalent in post?</p> <p>Managers are responsible for investigating and responding to complaints within their service area. They are supported by a central team who investigate and respond to some complaints. This team logs, monitors, advises, quality assures all formal complaint responses and consider 2nd stage review requests. They also maintain and monitor a complaints action log.</p>	Yes	
	Does the complaint officer have autonomy to resolve complaints?	Yes	
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	Yes	
	<p>If there is a third stage to the complaints procedure are residents involved in the decision making?</p> <p>There is no third stage in our complaints process and the Ombudsman does not believe a third stage is necessary.</p>	N/A	
	Is any third stage optional for residents?	N/A	
	<p>Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?</p> <p>At every stage the customer should be advised of this right and it is included in each formal stage written response.</p>	Yes	
	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes	

	At what stage are most complaints resolved? Prior to April 2021, we resolved most complaints at the 'informal' manager 48 hr call back stage. We have been operating an all formal process since April 21 which means the majority of complaints are now resolved at stage one.		
4	Communication		
	Are residents kept informed and updated during the complaints process? The policy and process includes this requirement: "This [complaint] investigation should include contact with the complainant (e.g. by telephone/email or face to face) as a matter of course." Furthermore "...we will always keep complainants informed of any delays and advise them when a response can be expected"	Yes	
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision? The policy and process includes this requirement: "This includes providing the complainant with an opportunity to comment on any adverse findings before a final decision is made."	Yes	
	Are all complaints acknowledged and logged within five days? Formal complaints are logged and acknowledged within two working days.	Yes	
	Are residents advised of how to escalate at the end of each stage? The stage one and stage two formal response letters include this advice.	Yes	
	What proportion of complaints are resolved at stage one?	96%	491/511
	What proportion of complaints are resolved at stage two?	4%	21/511
	What proportion of complaint responses are sent within Code timescales? <ul style="list-style-type: none"> • Stage one Stage one (with extension) 	78% 84%	

	<ul style="list-style-type: none"> Stage two Stage two (with extension) 	89% N/a	
	<p>Where timescales have been extended did we have good reason? Not always. We have introduced a self-serve reporting tool for SLT so they can monitor timeframes in their department and transfer complaints to other colleagues as required. Reasons for extended timescales have included complaint complexity; complainant availability and relevant staff absence; workload/backlog during and as a result of the pandemic.</p>	Not always	
	<p>Where timescales have been extended did we keep the resident informed? The policy and process includes this requirement and holding letters are sent where the complaints team are informed. Because of volume/workload this period a hold letter has not been sent in every instance but customers are generally kept informed by investigating managers.</p>	Yes	
	<p>What proportion of complaints do we resolve to residents' satisfaction? *Based on 40 returns of formal complaint satisfaction surveys so a very small sample</p>	33%*	3.3/10
5	Cooperation with Housing Ombudsman Service		
	Were all requests for evidence responded to within 15 days?	Yes	
	Where the timescale was extended did we keep the Ombudsman informed?	N/a	
6	Fairness in complaint handling		
	Are residents able to complain via a representative throughout?	Yes	
	<p>If advice was given, was this accurate and easy to understand? From a sample of cases advice was generally accurate and easy to understand. Formal complaint responses are reviewed for accuracy by our Complaints Team before being issued.</p>	Yes	
	<p>How many cases did we refuse to escalate? Five</p> <p>What were the reasons for the refusals?</p>		

	<p>One was refused because the issue being complained about had been taken through our complaints process previously.</p> <p>Three were refused because the customer could not reasonably tell us why they wished to escalate their complaint nor what outcome they wanted to see (as stipulated in our complaints policy).</p> <p>One was refused because it was part of a related complaint which had already been through our process and escalated to the Ombudsman.</p>		
	Did we explain our decision to the resident?	Yes	
7	Outcomes and remedies		
	<p>Where something has gone wrong are we taking appropriate steps to put things right?</p> <p>The policy and process includes a remedies section which should be appropriately applied. We maintain a complaints action log to record and track remedial actions.</p>	Yes	
8	Continuous learning and improvement		
	<p>What improvements have we made as a result of learning from complaints?</p> <p>The experience team conducts deep dives into the causes of complaints. We carry out customer journey maps to understand the impact on the people making the complaint. Themes and action taken is published annually on our website on the ‘complaints performance’ page – link: https://www.onemanchester.co.uk/who-we-are/how-we-are-doing/complaints-performance. Small incremental changes are made as we learn from complaints, a ‘lessons learnt’ section is included in complaint responses, and longer term projects are in the pipeline for this year and next to address the bigger issues identified.</p>		
	<p>How do we share these lessons with:</p> <p>a) residents? As above on the One Manchester website</p> <p>b) the board/governing body? Quarterly reports to Place Committee and an annual report to Board</p> <p>c) in the Annual Report? Summary information included in Annual Report each year</p>		

	Has the Code made a difference to how we respond to complaints?	Yes	
	<p>What changes have we made?</p> <p>Our complaints policy and processes have been amended to meet the requirements of the Code and include:</p> <ul style="list-style-type: none"> - stage 1 response timescale has been reduced from an acknowledgement in 2 days and response 10 days from acknowledgement (in effect 12 days) to 10 days from receipt of complaint - stage 2 response timescale has been reduced from holding a review within eight weeks of accepting the review with a written response 20 days from that review to 20 days from the request to escalate - to comply with the above stage 2 timescale we have changed the process from a review panel approach to a review by an Executive Director/SLT Member - advice on access to the Housing Ombudsman Service is provided at every stage – previously that advice was provided once a complaint had exhausted our complaints procedure i.e. in our stage 2 response 		