

Self-assessment against the Housing Ombudsman's Complaint Handling Code



Section 1: Definition of a complaint

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	<p>Detailed in the Complaints, Feedback and Redress Policy and the how to make a complaint section on the Group's website, Make a compliment or complaint Progress Housing Group (progressgroup.org.uk)</p> <p>Housing Ombudsman's Complaint Handling Code Self Assessment Progress Housing Group (progressgroup.org.uk)</p>	
1.3	<p>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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>Included in the Group's Complaints, Feedback and Redress Policy and training.</p> <p>Policies Progress Housing Group (progressgroup.org.uk)</p>	
1.4	<p>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.</p>	Yes	<p>A service request is a request from a customer requiring action to be taken to put something right. Service requests are not complaints.</p> <p>This is detailed in the Group's Complaints, Feedback and Redress Policy. Policies Progress Housing Group (progressgroup.org.uk)</p>	<p>Service requests are logged on our core housing system and actioned in accordance with policy and procedure. During the next financial year, a framework for monitoring and reviewing this will be established to identify trends and learn from them.</p>

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	Included in the Group's Complaints, Feedback and Redress Policy and training.	
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	On the bottom of the tenant satisfaction measures (TSM) postal surveys is a link to the relevant website - 'For more information about how you can register a formal complaint or leave more formal positive feedback, please visit our dedicated web page below'. This page explains the definition of a complaint, provides a link to our policy, and provides a clear explanation of the process any logged complaint will follow. Our process is in line with the Housing Ombudsman's guidance.	Information has been added to the transactional surveys. This information has been reduced for text messages.

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	Included in the Group's Complaints, Feedback and Redress Policy.	Progress Housing Group has not refused to accept any complaints.

2.2	<p>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:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. <p>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.</p> <p>Matters that have previously been considered under the complaints policy.</p>	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
2.3	<p>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.</p>	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	The Group's Complaints, Feedback and Redress Policy policy has been updated in line with the new code.
2.4	<p>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.</p>	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	

Section 3: Accessibility and awareness

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Details of how to make a complaint are available:</p> <ul style="list-style-type: none"> • in the Complaints, Feedback and Redress Policy • on the website • in the tenant newsletter • in the complaint leaflet - including Easy Read, large print and audio/captioned versions (video explainer) <p>Reasonable adjustments will be made based on individual customer needs and are detailed in the Group's Equality, Diversity and Inclusion Policy and Reasonable Adjustments Policy.</p>	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Details of how to make a complaint are available:</p> <ul style="list-style-type: none"> • in the Group's Complaints, Feedback and Redress Policy • on the Group website • in the tenant newsletter • in the complaint leaflets • on the website in a video. 	

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	Board response to complaints performance	
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	There are two versions of the complaint leaflet, including an Easy Read version and a video on the Group's website. Available in supported living and independent living schemes. Printed versions are available. The Complaints, Feedback and Redress Policy is on the Group's website.	
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	The Group's Complaints, Feedback and Redress Policy is on the intranet and internet. Information on how to find the code is provided by a link in the Group's Complaints, Feedback and Redress Policy.	
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	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Advised in acknowledgement and response letters at each stage.	

Section 4: Complaint handling employees

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The customer feedback coordinator manages the Feedback Team, which now consists of two complaint resolution officers.	
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	The Customer Feedback Team works closely with all levels of employees to support complaint resolution, including the executive director responsible for complaints and the non-executive director leads for complaints.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes	<p>The Customer Feedback Team is solely focused on complaint handling.</p> <p>The team support colleagues with complaint-handling training as required.</p>	<p>The Customer Feedback Team provides formal training across the Group on complaint handling.</p> <p>The Group has recently introduced RAMP (customer service style framework) for all colleagues, promoting a positive customer experience.</p>

Section 5: The complaint handling process

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
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	The first point of contact or early resolution will be attempted in the first instance; however, this does not delay the progression through the complaint's procedure.	
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	The Group's Complaints, Feedback and Redress Policy has only 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	N/A	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	Where support from external contractors is required, this will be facilitated by the Customer Feedback Team.
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	Included in the letter template and in the Group's Feedback Policy and procedure.	

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	Set out in acknowledgement and response letters and Feedback Policy and procedure.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	This is included in the Group's Complaints, Feedback and Redress Policy and procedure.	The Customer Feedback Team provides training across the Group on complaint handling.
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	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Included in the Group's Reasonable Adjustment Policy.	The Customer Feedback Team will provide training and guidance to complaint handlers as required.
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	Included in the Group's Complaints, Feedback and Redress Policy.	

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	All correspondence and contact are recorded on core housing systems.	
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	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Included in Group unacceptable behaviour procedure.	
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	Group unacceptable behaviour procedure in place.	

Section 6: Complaints stages

Stage 1

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Included in the Group's Complaints, Feedback and Redress Policy and training.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Housing Ombudsman Service details are included in all complaint correspondence and templates.	

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	Included in Group procedure. Actions recorded on core housing systems and monitored to completion, keeping the tenant updated.	
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	All complaints are responded to in writing, and templates are used to guide responses.	
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	Included in the Group's Complaints, Feedback and Redress Policy.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	All information is included in templates for responses, which are sent in writing.	

Stage 2

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
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		Customers will be asked for further clarification where required.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Included in the Group's Complaints, Feedback and Redress Policy.	
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	Included in the Group's Complaints, Feedback and Redress Policy.	
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	When confirmed in writing, Housing Ombudsman Service contact details are included.	

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	Included in Group procedure, actions are tracked to completion, keeping the tenant updated.	
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	Provided in response letters.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Provided in response letters.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	In the Group's Complaints, Feedback and Redress Policy and procedures.	

Section 7: Putting things right

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • 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	<p>Any outstanding actions are monitored.</p> <p>When goodwill or compensation is offered, tenants are advised to allow 10 working days for payment to be processed.</p> <p>The Group utilises the Housing Ombudsman's guidance on remedies.</p>	
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Training, guidance and template letters.</p> <p>Goodwill/compensation is included in the Group's Complaints, Feedback and Redress Policy.</p>	
7.3	<p>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.</p>	Yes	<p>Any outstanding actions are monitored.</p> <p>When goodwill or compensation is offered, tenants are advised to allow 10 working days for payment to be processed.</p>	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Housing Ombudsman's guidance has been included in the Complaints, Feedback and Redress Policy, including relevant examples.	
-----	--	-----	---	--

Section 8: Putting things right

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Reports to the board are provided quarterly, and annual self-assessments completed and submitted.</p> <p>The first service improvement report was completed this year.</p> <p>Complaints and compliments</p>	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Reports to the board are provided quarterly and annually. Service improvement report annually. Board response to complaints performance	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Review and self-assessment carried out following annual requirements and the new Housing Ombudsman's code.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		N/A	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: yes/no	Evidence	Commentary/explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Lessons learnt are reported to the board quarterly.	Periodic complaint forums have been introduced.

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	The customer feedback coordinator meets with heads of service quarterly to review their complaints and lessons learned.	A monthly meeting has begun, at which representatives from each area of the business attend to review their complaints and lessons learned. This will become quarterly from July 2024.
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	Lessons learnt, including evidencing actions taken, are reported to the board and customer forums.	A more rigorous approach has been implemented as per above, where findings will be reported back to the board and customer forums.
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 executive director is the senior lead for complaints and meets with the customer feedback coordinator quarterly.	
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	The board has appointed two non-executive directors with lead responsibility for complaints.	Quarterly meetings with NED have been established.
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	Managed through quarterly meetings with the complaints team and non-executive director leads.	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	Provided in quarterly reports to the board.	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<ul style="list-style-type: none"> a. Training and guidance are given to colleagues and promotion through intranet articles of complaint resolution. b. The Group encourages colleagues to take responsibility, acknowledge any identified service failures, and be transparent with our customers. <p>The Group's values meet the professional standards of the Chartered Institute of Housing.</p>	