

# Housing Ombudsman Complaint Handling Code: Halton Housing Self-Assessment November 2023

## 2022 Section 1 - Definition of a complaints

### Mandatory “must” requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	3.1 A complaint is: 'an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Halton Housing, our colleagues, or those acting on our behalf, affecting an individual customer or group of customers.  <a href="#">Talk to us policy</a>
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	3.2 A customer does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative will still be handled in line with this policy.  <a href="#">Talk to us policy</a>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	3.10 .....However, if further enquiries are needed to resolve the matter, or if the customer requests it, the issue will be logged as a complaint.  8.1 .....If we are unable to informally resolve the concern within 5 days, or if the customer requests it sooner, the complaint will proceed to stage one with agreement from customer. <a href="#">Talk to us policy</a>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	4.1 We will accept a complaint unless there is a valid reason not to do, we may not accept a complaint when:
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.		<ul style="list-style-type: none"> <li>The issue is more than six months old, or the customer had been aware of it for more than six months and has not contacted us, the customer will be informed in writing that the issue(s) raised cannot be dealt with under the complaints procedure because it is time-barred.</li> </ul>

			<ul style="list-style-type: none"> <li>• It relates to a first-time request for a service.</li> <li>• The complaint or formal enquiry is relating to any active legal proceedings.</li> <li>• The complaint has already been considered under a previous complaint and the issues are the same.</li> <li>• If the complaint is considered to be vexatious (A vexatious complaint is one that is pursued without merit, persistently or deliberately to cause annoyance or frustration, guidelines on this can be found in our vexatious complaints procedure)</li> </ul> <p><a href="#">Talk to us policy</a></p>
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman	Yes	<p>4.2 If we decide not to accept a complaint, we will write to the customer with a detailed explanation as to the reasons why and explain the customer's option to contact the Housing Ombudsman.</p> <p><a href="#">Talk to us policy</a></p>

## Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	3.5 We recognise the difference between a service request, whereby a customer may be unhappy with a situation that they wish to have rectified or make a request requiring action to be taken, and a complaint about the service they have/have not received. <a href="#">Talk to us policy</a>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	When dissatisfaction is expressed as part of a customer survey, the Insight Advisor completing the survey will make customer aware how they can pursue their dissatisfaction as a complaint where appropriate. All expressions of dissatisfaction are logged on our housing management system and where action is required it is logged in the relevant work tray.

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be	Yes	5.1 Customers can raise an enquiry, compliment or complaint using our online form, customer app and portal, in person by visiting Waterfront Point, or by telephone.  <a href="#">Talk to us policy</a>

	more than one route of access into the complaints system.		
<b>2.3</b>	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	5.3 Our complaint policy and process is available on website in a clear format for all customers. The policy is also available in other formats when requested by customers.  <a href="https://www.haltonhousing.co.uk/contact-us/complaints-and-feedback">https://www.haltonhousing.co.uk/contact-us/complaints-and-feedback</a> .
<b>2.4</b>	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<a href="https://www.haltonhousing.co.uk/contact-us/complaints-and-feedback">https://www.haltonhousing.co.uk/contact-us/complaints-and-feedback</a>
<b>2.5</b>	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	5.5 We are committed to making sure that our complaints process is accessible to all customers and that no customers are disadvantaged in accessing it. As a result, we will make reasonable adjustments to our policies for customers with disabilities. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy.  Many of the arrangements that we offer can also be made available for customers that do not have disabilities, but the adjustment would make the process easier for them. For example, provision of documents in larger font  <a href="#">Talk to us policy</a>
<b>2.6</b>	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents	Yes	Talk to Us policy and process and Complaint Handling Code are published on the website and in our Reach customer newsletter. Housing Ombudsman posters are also displayed in communal areas. Also shared with our Customer Forum
<b>2.7</b>	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Housing Ombudsman contact information is detailed on correspondence letters to customers. Published on our website and on communication with customer.

2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	All correspondence relating to a customer's complaint whatever the stage provides details on how to contact the Ombudsman <a href="#">Talk to us policy</a>
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### Best Practice 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
2.2	Where a landlord has set up channels to communicate	Yes	5.2 If we receive a complaint via social media, our Brand and Reputation team will advise the customer of the correct channels to use to log a complaint to ensure the process is followed correctly with confidentiality and privacy.  <a href="#">Talk to us policy</a>

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer"	Yes	6.1 A Resolution Coordinator is dedicated to coordinating the complaints process within the organisation ensuring that complaints are dealt with appropriately and in a timely manner. The Resolution Coordinator is also responsible for liaising with the Housing Ombudsman. The Resolution Co-ordinator ensures that all complaints are logged appropriately in the system, which ensures they can be reported on to SMT and the governing body.  <a href="#">Talk to us policy</a>

3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>6.2 We also have complaint handlers across the organisation, who have responsibility for complaint investigation and responding to customers in line with the Complaint Policy and Procedure.</p> <p>6.3 Complaint handlers are trained in the policy and procedure and have the appropriate skills and experience. Any conflict of interest is passed to the complaint handlers line manager for review.</p> <p><a href="#">Talk to us policy</a></p>
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### Best Practice 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick 25 resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly</li> </ul>	Yes	<p>6.3 Complaint handlers are trained in the policy and procedure and have the appropriate skills and experience. Any conflict of interest is passed to the complaint handlers line manager for review.</p> <p>Complaint handlers will:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with customers that may be or upset</li> <li>• have access to colleagues at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul> <p><a href="#">Talk to us policy</a></p>

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b> .	Yes	7.1 We try hard to resolve any customer concerns informally with the agreement of the customer, all concerns are recorded and managed on our complaint system. If we are unable to informally resolve the concern within five days, or if the customer requests it sooner, the complaint will proceed to stage one with agreement from customer.  <a href="#">Talk to us policy</a>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	8.1 When a formal complaint is made, it is acknowledged and logged at stage one of the complaints procedure within five days of receipt. The Resolution Coordinator will acknowledge all complaints and set out our understanding of the complaint and the outcomes the customer is seeking. If any part of complaint is unclear, we will ask for further information from the customer to ensure all elements of the complaint are clear and understood by both parties.  <a href="#">Talk to us policy</a>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	7.5 A complaint investigation will be conducted in an impartial manner. The complaint handler will:
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> </ul>	Yes	

	keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.		<ul style="list-style-type: none"> <li>• Consider all issues, information and evidence carefully</li> <li>• Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul> <p><a href="#">Talk to us policy</a></p>
<b>4.11</b>	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>7.8 The Resolutions Coordinator and Complaint Handler will keep customers regularly updated about the progress of their complaint. We will adhere to any reasonable arrangements agreed with customers in terms of frequency and method of communication.</p> <p><a href="#">Talk to us policy</a></p>
<b>4.12</b>	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>7.9 The customer, and if applicable any colleague who is the subject of the complaint, will also be given a fair chance to set out their position and comment on any findings before a final decision is made.</p> <p><a href="#">Talk to us policy</a></p>
<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>9.2 Customers wishing to progress to stage two of the formal complaint's procedure must make a request within twenty working days of receiving the stage one decision letter. The request must clearly outline why they complaint has not been investigated and resolved.</p> <p><a href="#">Talk to us policy</a></p>
<b>4.14</b>	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a	Yes	<p>9.3 In instances where we decline to escalate a complaint, we will clearly communicate in writing our reasons for not escalating as well as the customers right to approach the Ombudsman about our decision.</p>



	landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		<p>We may refuse to escalate a complaint if:</p> <ul style="list-style-type: none"> <li>• The stage two complaint is outside of the 20-day time period outlined in the stage one response</li> <li>• The complaint relates to any active legal proceedings</li> </ul> <p><a href="#">Talk to us policy</a></p>
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	<p>7.10 A full record of the complaint is kept in our complaints system. This will include the original complaint, date received, all correspondence with the customer, correspondence with other parties, any reports or surveys prepared, the complaint investigation and any outcomes at each stage.</p> <p><a href="#">Talk to us policy</a></p>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We have a <a href="#">Customer Code of Conduct</a> and Vexatious Customer Policy

### Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	The Resolutions Coordinator contacts the customer on receipt of their complaint to discuss their desired outcome and will manage expectations
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to	Yes	Resolution timescales are ten working days for stage 1 complaints and twenty working days for stage 2 complaints. We will always review each case individually and look to resolve earlier than this timescale when possible.

	fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.		
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	7.4 We give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with us where this is reasonable. <a href="#">Talk to us policy</a>
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	7.6 Where a key issue of a complaint relates to the parties' legal obligations, we will clearly explain this and provide copies of any relevant policies or documents that help customers to understand our decisions. <a href="#">Talk to us policy</a>
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	7.7 Any communication with the customer will not generally identify individual members of staff or contractors. <a href="#">Talk to us policy</a>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	7.8 The Resolutions Coordinator and Complaint Handler will keep customers regularly updated about the progress of their complaint. We will adhere to any reasonable arrangements agreed with customers in terms of frequency and method of communication. <a href="#">Talk to us policy</a>
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture	Yes	A transaction customer satisfaction survey for complaints went live in December 2022
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that the staff are supported and engaged in the	Yes	Full training is provided to all Complaint Handlers across the organisation on process and procedure. Monthly complaint meetings take place with both SMT and Complaint Handlers to discuss any improvement necessary. We have launched "Complaints as Opportunities" through our Listen Learn, Act complaint framework.

	complaint process, including the learning that can be gained.		
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	7.11 Our Customer Code of Conduct and Vexatious Customer Policy sets out how we will manage unacceptable behaviour from customers and/or their representatives when pursuing a complaint.  <a href="#">Talk to us policy</a>

## Section 5 - Complaint stages

### Mandatory 'must' requirements Stage 1

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.1	Landlords must respond to the complaint <b>within 10 working days</b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	8.2 We will respond to a complaint within ten working days of it being logged. On occasion we may require more time to full investigate the complaint, if we require an extension beyond ten days, we will provide an explanation to the customer containing a clear timeframe and reasons for the extension. This should not exceed a further ten days without good reason.  <a href="#">Talk to us policy</a>
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must	Yes	8.6 When the complaint investigation is complete, we will send a response to the customer addressing all points raised, providing clear reasons for any decisions, outlining any actions taken or required and referencing any relevant policy, law and good practice where appropriate.  Actions required will be tracked and actioned with regular updates provided to the customer.  <a href="#">Talk to us policy</a>
	Landlords must confirm the following in writing to the resident at the	Yes	8.8 We will confirm the following in writing to the customer at the completion of stage one

5.8	<p>completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul> <p>details of how to escalate the matter to stage two if the resident is not satisfied with the answer</p>		<ul style="list-style-type: none"> <li>The complaint stage</li> <li>The decision on the complaint</li> <li>The reasons for any decisions made</li> <li>The details of any remedy offered to put things right</li> <li>Details of any outstanding actions</li> <li>Details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>
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## Stage 2

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	<p>9.1 If all or part of the complaint is not resolved to the customers satisfaction at stage one customers can progress to stage two of our complaints process unless an exclusion applies.</p> <p>9.3 In instances where we decline to escalate a complaint, we will clearly communicate in writing our reasons for not escalating as well as the customers right to approach the Ombudsman about our decision.</p> <p>We may refuse to escalate a complaint if:</p> <ul style="list-style-type: none"> <li>The stage two complaint is outside of the 20-day time period outlined in the stage one response</li> <li>The complaint relates to any active legal proceedings</li> </ul> <p><a href="#">Talk to us policy</a></p>
5.10	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding</p>	Yes	<p>9.4 When we receive a request to progress to stage two, we will set out our understanding of issues outstanding and the outcomes the customer is seeking. If we are unsure about any aspect of the complaint, we will ask the customer for</p>

	and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.		<p>further information to ensure all elements of the complaint are agreed by both parties.</p> <p><a href="#">Talk to us policy</a></p>
<b>5.11</b>	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	<p>9.5 We will only escalate a complaint to stage two once it has completed stage one and at the request of the customer.</p> <p><a href="#">Talk to us policy</a></p>
<b>5.12</b>	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one	Yes	<p>9.6 The person considering the complaint at stage two, will not be the same person</p> <p><a href="#">Talk to us policy</a></p>
<b>5.13</b>	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>9.8 We will respond to the stage two complaint within twenty working days of the complaint being escalated. On occasion we may need an extension to this timeframe to fully investigate the complaint, if this is the case, we provide a clear explanation to the customer with clear timeframes for the extension. This will not exceed a further 10 days without good reason.</p> <p>If an extension beyond ten working days is required to enable us to respond to the complaint fully, this will be agreed by both parties.</p> <p><a href="#">Talk to us policy</a></p>
<b>5.16</b>	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions and</li> </ul>		<p>9.10 We will confirm the following in writing to the customer at the completion of stage two</p> <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• Details of the complaint</li> <li>• The decision</li> <li>• A clear explanation of how the decision has been reached</li> <li>• The details of any remedy offered to put things right</li> <li>• Details of any outstanding actions and when they will be completed</li> </ul> <p><a href="#">Talk to us policy</a></p>

	<ul style="list-style-type: none"> <li>if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>		
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### Stage 3

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We do not have a stage 3
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>the complaint stage 31</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul>	Yes	We do not have a stage 3

	<ul style="list-style-type: none"> <li>details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>		
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### Best practice 'should' requirements Stage 1

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	Yes	<p>8.2 We will respond to a complaint within ten working days of it being logged. On occasion we may require more time to full investigate the complaint, if we require an extension beyond ten days, we will provide an explanation to the customer containing a clear timeframe and reasons for the extension. This should not exceed a further ten days without good reason.</p> <p>If an extension beyond twenty working days is required to enable us to respond to the complaint fully, this will be agreed with the customer.</p> <p><a href="#">Talk to us policy</a></p>
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	<p>8.3 Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.</p> <p><a href="#">Talk to us policy</a></p>
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	<p>8.4 Where the problem is a recurring issue, we will consider any older reports as part of the background to the complaint if this helps to resolve the issue for the customer.</p> <p><a href="#">Talk to us policy</a></p>

5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint	Yes	8.6 Where customers raise additional issues during the investigation, these will be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint may be logged as a new complaint.  <a href="#">Talk to us policy</a>
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### Best practice 'should' requirements Stage 2

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	9.8 We will respond to the stage two complaint within twenty working days of the complaint being escalated. On occasion we may need an extension to this timeframe to fully investigate the complaint, if this is the case, we provide a clear explanation to the customer with clear timeframes for the extension. This will not exceed a further 10 days without good reason.  If an extension beyond ten working days is required to enable us to respond to the complaint fully, this will be agreed by both parties.  <a href="#">Talk to us policy</a>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	9.9 Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.  <a href="#">Talk to us policy</a>



### Best practice 'should' requirements Stage 3

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	We do not have a stage 3
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We do not have a stage 3

### Section 6 - Putting things right

#### Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
6.1	Effective dispute resolution requires a process designed to resolve	Yes	In all response letters sent to customers we set out what went wrong and what we intend to do to put things right. <a href="#">Stage 1 letter template</a>

	complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.		10.1 Where something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right.  <a href="#">Talk to us policy</a>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	10.2 When offering a remedy, we will consider the extent of any service failures and the level of detriment caused to the customer as a result. We follow the Housing Ombudsman guidance on remedy and resolution.  <a href="#">Talk to us policy</a>
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	10.4 Any remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion. We follow the Housing Ombudsman guidance on remedy and resolution.  <a href="#">Talk to us policy</a>
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	This would be in line with our <a href="#">compensation policy</a> .

### Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
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6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be “put right” in terms of process or systems	Yes	All complaints are closed with a learning outcome and qualitative comment. These are reported on monthly and discussed at the Complaints meeting. An action log keeps a record of any actions we have taken to address.  Complaint performance is discussed with the Customer Forum and with SMT.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	We would take the appropriate legal advice in this instance.

### Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	We report on complaints performance in our annual report. We have regular communication in our Reach customer magazine complaints/performance and Ombudsman information. We report on complaint performance to our Customer Forum and Scrutiny panel annually.

### Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
7.3	A member of the governing body should be appointed to have lead responsibility	Yes	We have a board member who is the lead responsible for complaints.

	for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance		
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	No	<p>Complaint volume and SLA performance is regularly reported in our quarterly performance pack to Halton Housing Board. It is also included in our annual report. As well as individual customer complaint stories which are a regular feature in our board reports. However, would need to be expanded to meet all recommendations of this code section</p> <p>As part of our new Listen, Learn, Act complaint framework we will be providing a more detailed report moving forward that includes more detail on lessons learned and service improvement as a result.</p>

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training	Yes	Complaint Insight is shared with SMT and Complaint Handlers monthly and any relevant action taken in our monthly CX report and action log.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	SMT meet monthly to discuss the Insight from complaints and agree an action plan for improvement. We are part of the Northwest Complaints forum and share knowledge and best practice within the housing sector.

**Section 8 - Self-assessment and compliance Mandatory 'must' requirements**

Code Section	Code Requirement	Comply Yes / No:	Evidence, Commentary & explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	The self-assessment is completed annually and available on our website. <a href="https://www.haltonhousing.co.uk/contacts/complaints-and-feedback">https://www.haltonhousing.co.uk/contacts/complaints-and-feedback</a>

8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	No significant restructure or change of procedures.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> </ul> <p>include the self-assessment in their annual report section on complaints handling performance</p>	Yes	The self-assessment is completed, available on our website and included in our annual report. The self-assessment is shared with our Customer Forum, SMT and Halton Housing board.