

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <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>	Yes	Definition included in Complaints, Comments and Compliments Policy available here: Complaints-Comments-Compliments-Policy-July-23.pdf (wchg.org.uk)
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	Wherever customers express dissatisfaction of service they are directed to the Customer Feedback Team. WCHG progresses complaints from tenant representatives, as outlined in policy.
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	Complaints are logged at customer request, as well as in cases when further enquiries are required to resolve the matter.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We will log/process a complaint every time unless it is part of our exclusions set out in the policy.

<p>1.8</p>	<p>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.</p>	<p>Yes</p>	<p>Exclusion list set out in policy</p> <ul style="list-style-type: none"> • Complaints about services, persons or bodies over which the Group has no control; • Initial requests for service e.g. reporting a repair or where you are telling us about a problem for the first time (unless this relates to staff behaviour); • A claim for damages or personal injury which will be dealt with by our Insurers as an insurance claim; • Attempts to reopen or reconsider a complaint where we have already provided a final decision; • Matters which are, or could reasonably be expected to be the subject of court or tribunal proceedings or which are in the hands of the Group's Insurers; • Complaints arising from the ending of a tenancy as part of the starter tenancy procedures; • Complaints of neighbour nuisance or disputes between neighbours that are dealt through our Anti-Social Behaviour (ASB) Policies, unless these complaints relate to how we have dealt with the matter; • Complaints that have not been brought to our attention within twelve months after the incident - complaints outside of this time though can be considered at the discretion of the Customer Services Manager if there is evidence to suggest it would be unreasonable not to. <p>Exclusions are reviewed in consultation with</p>
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			tenants every three years, most recently in 2023. Next review due by May 2026.
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	If we refuse to take a complaint forward this is put in writing to the customer referencing the policy and citing the exclusion their complaint relates to and we will include reference to the customer's right to take that decision to the Ombudsman. 2022-2023 – we refused to take forward 2 complaints due to one complaint already being responded to at stage 2 and one complaint that was historical and we could not ascertain with the customer what they were dissatisfied with.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	Referenced in Section 5.5 of policy Complaints-Comments-Compliments-Policy-July-23.pdf (wchg.org.uk)
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.	No	Surveys conducted by telephone inform customer of how they can pursue their dissatisfaction as a complaint if they wish to. During 2023/24 WCHG will develop a mechanism to record to what extent this happens on all transactional surveys across the Group.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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 more than one route of access into the complaints system.	Yes	In person, by telephone, in writing, by email via our website and social media
2.3	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	<p>Policy available on website and upon request available:</p> <ul style="list-style-type: none"> • in paper copy • e-version • in alternative accessible formats including translation into different languages, audio, braille and large print. <p>Simplified visual 'flowchart' showing the process, stages and timescales available in a dedicated Customer Feedback Leaflet and on website (Complaints Procedure - WCHG – under review Sep 23</p>
2.4	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	<p>Complaints, feedback and praise - WCHG on our website includes:</p> <ul style="list-style-type: none"> • How to make a complaint including digital form and direct email address • Policy • Reasonable adjustments information • Complaint Handling Code • Self-assessment against Code • Service improvements made as a result of customer feedback

2.5	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	Reasonable Adjustments statement published and included as part of the Complaints section on website Complaint handler training in place and well-attended. During 2023/24 we will ensure training completed by all complaint handlers across the organisation.
2.6	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	Website, customer leaflets, newsletter, Annual Report
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Website, customer leaflets. Standard paragraph is added to all Stage 2 responses – 'This stage two response forms the final part of the Group's internal complaints procedure. If you remain dissatisfied with the response you can refer the matter to the Housing Ombudsman directly yourself.'
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	WCHG provide information on the customer's right to access the Housing Ombudsman Service at the complaint acknowledgement stage.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	During 2022/23, 70 informal complaints/service requests came via social media. Complaints received via social media are formally responded to via other channels and private messages used for initial response. At the next review point, the Policy will be updated to specifically include details of these steps that are taken to maintain confidentiality and privacy.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	The WCHG 'Complaints Officer' using this definition comprises: <ul style="list-style-type: none"> • Customer Experience Manager • Customer Feedback Co-ordinator x 2
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Declaration of interests completed annually by all employees. Appropriate training in place for appointed complaints handlers.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	The Customer Feedback Team have autonomy to resolve informally to prevent formal escalation and where necessary can offer apologies, goodwill gestures and arrange/organise appropriate action to put things right.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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 within five days of receipt.</p>	Yes	<p>Reference 7.2 in policy where there are quick fixes or where complaints can be dealt with informally the customer must agree.</p> <p>All stage one complaints are acknowledged within 2 working days.</p>

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	We set out the understanding of the complaint in acknowledgment. If any aspect of the complaint is unclear we will contact the customer to clarify. We also reference the outcomes the resident is seeking, where these are already clear.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints are processed to then manager of the relevant service and copied to Senior Manager. If the complaint references the manager, or a different type of conflict of interest is identified, it would be processed to another appropriate manager for investigation.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	A tenant-only Scrutiny Group reviewed quality of responses to all Stage 2 complaints and reported findings to CX Committee in November 2022 and May 2023. Their finding was that both compliance with policy and quality of responses is good.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Recent examples of reasonable arrangements during 2022/23 have included agreements to communicate: <ul style="list-style-type: none"> • with a third party • extended timescales to meet customer need & availability

4.12	<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"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Investigation involves subjects of the complaint being spoken to as part of the process.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>Referenced in policy 7.7 Standard final paragraph – Stage 1 If you are not satisfied with this response you can ask for your response to be considered for a review at the next stage of our complaints process. To proceed on that basis, you can contact the customer feedback team and talk to them about the reasons why you are unhappy and they can let you know the different options available to you. You can contact them by calling 0800 633 5500 or by emailing complaints&praise@wchg.org.uk or writing to us at the address above. You will need to do this within 28 days of receiving this written response to your complaint.</p>
4.14	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 landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	<p>2022-2023 Data – 0 refusals to escalate All residents are informed in writing of the reasons for the refusal to escalate and advised of the next steps available to them including designated person and Housing Ombudsman Service.</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	Complaint file for each resident/address with documentation stored managed by a central Customer Feedback Team.
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	Complaints Policy section 11.0 Managing Unacceptable Behaviour

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	A tenant-only Scrutiny Group reviewed quality of responses to all Stage 2 complaints and reported findings to CX Committee in November 2022 and May 2023. Their finding was that both compliance with policy and quality of responses is good.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	A Complaint Quality Network has been established to support managers and guidance has been provided to all complaint-handling managers. Annual reviews are undertaken by the tenant-only Scrutiny Group.
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	Reasonable Adjustment Statement
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	A Complaint Quality Network has been established to support managers and guidance has been provided to all complaint-handling managers.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We refer to the 'member of staff' or the 'contractor' rather than names of individuals.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Through acknowledgement letter/email/telephone call, contact from investigating manager, and interim response (where required).
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	Complaint Handling Survey to all customers following their formal complaint response. This survey will also be shared randomly to customers where we have responded to a complaint informally.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	<ul style="list-style-type: none"> • Complaint Handling Training videos available via colleague intranet • Housing Ombudsman Determinations shared with staff/Board • During 2022/23, we developed the Complaint Handling Network of colleagues for complaints handlers to review cases, ensure continual learning and oversee the successful implementation of lessons learned.
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	Any restrictions are subject to Group Leadership Team approval.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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	<p>2022-2023 data</p> <ul style="list-style-type: none"> • 216 stage one complaints • Of these: <ul style="list-style-type: none"> ○ 190 had a full response within 10 working days (88%) ○ 24 had a full response within 20 working days (11%) <p>Commentary on extensions - 2 stage one complaints had a full response within 22 working days (1%) as a reasonable adjustment at customer request;</p> <ul style="list-style-type: none"> • Complaint 1 - the customer was unwell and wanted to wait for a meeting to discuss the complaint • Complaint 2 – the customer required assistance from his McKenzie friend at a face to face meeting <p>Where an extension beyond 10 working days is required, the Customer Feedback Team issues an interim response to the customer.</p>

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 still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	This approach has been occasionally taken in the past. Outstanding actions are tracked by the central Complaints Handling Team and regular updates provided to the resident.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Complaint Handling Toolkit has been developed by our internal Complaints Quality Network and includes a new standard letter template to support managers, top tips for writing responses and resolution guidance
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	Complaint Handling Toolkit has been developed by our internal Complaints Quality Network – this includes a new standard letter template to support managers, top tips for writing responses and resolution guidance

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	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.	Yes	2022-23 Data <ul style="list-style-type: none"> • 0 refusals to escalate • 28 escalations to stage two
	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the	Yes	Dedicated Customer Feedback team to ensure consistent approach.

5.10	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.		
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Dedicated Customer Feedback team to ensure consistent approach.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	During 2022/23, all stage two complaints were considered by the next level of management or appropriate Senior Manager
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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>2022-2023 data</p> <ul style="list-style-type: none"> • 28 stage two complaints • Of these: <ul style="list-style-type: none"> ○ 20 customers received a full response within 10 working days (71%) ○ 8 customers received a full response within 20 working days (29%) <p>All stage two complaints were responded to within 30 working days of the complaint being escalated.</p> <p>Where an extension beyond 10 working days is required, the Customer Feedback Team issues an interim response to the customer.</p>
5.16	<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"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • 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. 	Yes	<p>Stage 2 final WCHG stage standard paragraph:</p> <p>Stage 2</p> <p>This stage two response forms the final part of the Group's internal complaints procedure. If you remain dissatisfied with the response you can refer the matter to the Housing Ombudsman directly yourself.</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	WCHG has a two-stage complaint procedure

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	NA	NA
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Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	In exceptional cases this would only be at request of the customer
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	Where a customer is dissatisfied with an extension of time we will provide Housing Ombudsman details
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	This forms part of the investigation
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	We would always encompass any new issues raised in the complaint response at stage one or two if no response has been issued to ensure resolution

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	In exceptional cases this would only be at request of the customer
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	Where a customer is dissatisfied with an extension of time we will provide Housing Ombudsman details

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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 <u>within 20 working days</u> 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.	NA	NA
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.	NA	NA

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve 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.	Yes	Acknowledge what has gone wrong, apologise, put what went wrong right, offer goodwill gestures, agree acceptable resolutions with residents, rectify delays, change decisions where appropriate
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	Introduction of Complaint Handling Toolkit which has a catalogue of remedies & compensation guidance
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	The Customer Feedback Team track actions from responses to completion directly with managers/customers to ensure they are complete
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	The dedicated Customer Feedback Team ensure consistent approach.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 to the benefit of all residents.	Yes	Complaint Learning Forms are a mandatory requirement for all complaints from which we can derive learning from patterns trends/wider issues.
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	Where legal redress is possible, WCHG provides relevant information to customers in complaint response e.g. insurers details and where appropriate seeks legal advice to share with customer

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	<p>Learning and improvements from complaints are communicated through our Annual Report, Tenant Newsletters, as well as through the dedicated Complaints section of WCHG website.</p> <p>Lessons learned are shared with staff via the Complaints Handling Network which meets regularly.</p> <p>The WCHG Board and Customer Experience Committee receive annual reports analysing complaints data and trends, as well as lessons learned.</p> <p>Learning 2022-2023 includes:</p> <ul style="list-style-type: none"> • Increased input to fencing programme contract due to increased demand • We added a quota of roofs to the programme for renewal where they are not in renewal area but in serious disrepair • We added decant tenancies to a fortnightly review meeting between Housing/Property • Amended assisted gardening application process so tenants who are eligible for medical reasons are not expected to reapply • Team Training session with Neighbourhoods about varied tenure & correct tenancy agreements to use accordingly

			<ul style="list-style-type: none"> • Bespoke training completed with the Income Team about meeting varying customer needs • Process has been changed to ensure property numbers on notice are not shared on adverts • Operations sub-group to be established to lead on operational decisions & cold weather planning
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility 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.	Yes	Dave Nuttall, Board and Customer Experience Committee member, was appointed in May 2022 to have lead responsibility for complaints.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • 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. 	Yes	<p>During 2022/23 the Board received:</p> <ul style="list-style-type: none"> • Annual Customer Feedback report • The annual self-assessment • Outcomes of any Housing Ombudsman investigations <p>In addition, the Customer Experience Committee received:</p> <ul style="list-style-type: none"> • Detailed Customer Feedback Report • A tenant-led Scrutiny Group review of Stage 2 complaints (policy compliance and quality of responses)

	The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		<ul style="list-style-type: none">• The annual self-assessment• Informal complaint handling action plan• Outcomes of any Housing Ombudsman investigations
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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	The Customer Experience Manager produces a 6-monthly analysis of complaints and trends which is reviewed by the Senior Managers' Forum. During 2022/23 learnings have been used to inform the Business Transformation process and prototyping.
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"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	WCHG's performance management approach does not take the approach of setting standard objectives for all employees. However, this objective is achieved through other ways including: <ul style="list-style-type: none"> • setting of Groupwide values including a 'one team' approach • the establishment of an internal Complaints Quality Network for teams to work together to drive improvements

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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	Published on WCHG website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Not yet occurred.

<p>8.3</p>	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • 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 • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	<p>Yes</p>	<p>In 2022/23 the outcome of the self-assessment was reported to Customer Experience Committee and Board and published on the WCHG website.</p> <p>The annual report section on complaints handling performance includes links to the full self-assessment.</p>
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