

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Definition included in Complaints Policy available here: WCHG Complaint Policy 2024	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	See Section 2.2 WCHG Complaint Policy 2024	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be	Yes	See Section 2.4 WCHG Complaint Policy 2024	

	recorded, monitored and reviewed regularly.			
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	See Section 2.5 WCHG Complaint Policy 2024	
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	See Section 2.6 WCHG Complaint Policy 2024	

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	See Section 5 WCHG Complaint Policy 2024	
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. • 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. 	Yes	<p>Exclusions set out in section 5.1 of policy: <i>We do not define the following as complaints:</i></p> <ul style="list-style-type: none"> • <i>Complaints about services, persons or bodies over which we have no control</i> • <i>Closed complaints you have raised previously and have already been considered under our complaints policy</i> • <i>Complaints that have not been brought to our attention within 12 months of the incident occurring. Where there are good reasons to do so, residents can request that our Complaints Officer consider whether to apply discretion to</i> 	

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 		<p><i>accept complaints made outside of this time limit.</i></p> <ul style="list-style-type: none"> <i>Matters which are, or have been, the subject of Court or Tribunal proceedings</i> <i>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 relating to ASB cases that are investigated under this complaints policy do not form part of the community trigger complaints initiative</i> <i>Where the Housing Ombudsman Service has already determined the outcome of an investigation</i> 	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints	Yes	See section 5.1 of WCHG Complaint Policy 2024	

	made outside this time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<p>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.</p> <p>2023-2024 – we refused to take forward 1 complaint from a former tenant where matters had been subject to legal proceedings 4 years prior to the complaint.</p>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>See Section 5 WCHG Complaint Policy 2024</p> <p>Each complaint is assessed on an individual case by case basis by the Customer Feedback Team.</p>	

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>In person, by telephone, in writing, by email via our website and social media see section 10 of WCHG Complaint Policy 2024</p> <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>Duties under the Equality Act 2010 and our approach to reasonable adjustments referenced in section 10.5 & 17.1 of the policy.</p> <p>Recent examples of reasonable arrangements during 2023-24</p>	

			<p>have included agreements to communicate:</p> <ul style="list-style-type: none"> • with a third party • extended timescales to meet customer need & availability 	
3.2	<p>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.</p>	Yes	<p>See Section 10.3 WCHG Complaint Policy 2024</p> <p>Customer can complain to any WCHG colleague. All colleagues are aware of the complaints process and are able to pass details of a complaint to the Customer Feedback Team by emailing the central inbox complaints&praise@wchg.org.uk via telephone or in person. WCHG have an internal Customer Feedback form for colleagues to complete via the intranet.</p> <p>During 2023-24 how to refer a complaint was publicised via a Make Things Right campaign, which included briefings to all colleagues.</p>	
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and</p>	Yes	<p>Make Things Right Campaign during 2023-2024 involved proactively encouraging</p>	

	<p>accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>		<p>complaints to increase the capture of customer feedback. We had a 79% increase in the number of complaints</p> <p>Customer Campaign</p> <ul style="list-style-type: none"> • Weekly Drop In sessions for customers • Weekly social media messages encouraging feedback July & Aug 2023 • Revised the Customer Feedback Leaflet • Displayed posters in WCHG sites & communal areas <p>Colleague Campaign</p> <ul style="list-style-type: none"> • Launched a new internal colleague Customer Feedback form • Customer Feedback Briefings to all colleagues 	
<p>3.4</p>	<p>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.</p>	<p>Yes</p>	<p>Section 10 of WCHG Complaint Policy 2024 sets out the steps taken to make our complaints process accessible.</p> <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 	
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	Referenced in section 18.0 of WCHG Complaint Policy 2024	
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	Referenced in section 4.2, of WCHG Complaint Policy 2024	
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	WCHG provides information on the customer's right to access the Housing Ombudsman Service via our policy and website, via Customer Feedback Leaflet, posters & at the written complaint acknowledgement stage & interim response stage.	

			<p>Standard paragraph is added to all Stage 2 responses – <i>'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.'</i></p>	
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Section 4: Complaint Handling Staff

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 WCHG 'Complaints Officer' is our Customer Experience Manager who manages the Customer Feedback Team, which comprises: Customer Feedback Administrator x 4	
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	Customer Experience Manager has access to colleagues at all levels & attends regular colleague meetings at all levels to ensure prompt resolution of complaints: Intervention Team, Business Influencers Group, Complaints Quality Network	
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	Yes	Learning forms are required & completed from all complaint handlers for every customer complaint response to capture root causes & how to prevent similar complaints reoccurring.	

	<p>core service and must be resourced to handle complaints effectively</p>		<p>2023-2024 Make Things Right Campaign manager workshops focused on root causes of complaints for key service areas & created an action plan to support complaint learning & service improvement.</p> <p>Make Things Right briefings delivered to all colleagues.</p> <p>Complaint Quality Network is a cross section of colleagues from WCHG who meet monthly to consider key complaint themes, to support complaint handlers & encourage a positive complaint handling culture.</p> <p>External complaint handling training regarding compliance with the code and WCHG policy currently being delivered to all managers & the Customer Feedback Team.</p> <p>Looking forward:</p> <p>2024-2025 - we are developing compliance training in relation to complaints for all colleagues at WCHG</p>	
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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	WCHG Complaint Policy 2024 Residents will not be treated differently if they complain.	
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	<p>WCHG aim to resolve expressions of dissatisfaction from customers at the earliest opportunity. The Customer Feedback Team triage expressions of dissatisfaction and differentiate between a service request and a complaint. This is referenced in section 2.4 of the policy.</p> <p>Informal complaints were removed from the Complaint Policy and approach in March 2024.</p> <p>We have a two stage complaint process referenced 7.1 of the policy & encourage where appropriate 'quick fix' stage 1</p>	

			complaints as referenced 8.1 of WCHG Complaint Policy 2024	
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	WCHG Complaint Policy 2024	
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	Where a complaint is handled by a third party (contractor) they will act in accordance with our policy as referenced section 7.3 of WCHG Complaint Policy 2024	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Where a complaint is handled by a third party (contractor) they will act in accordance with our policy as referenced section 7.3 of WCHG Complaint Policy 2024	
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,	Yes	We set out the understanding of the complaint or escalation in the 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	

	the resident must be asked for clarification.		clear. WCHG Complaint Policy 2024	
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	We set out the understanding of the complaint or escalation in the acknowledgment. We are clear about which aspects of the complaint we are responsible for and will advise or signpost where we are not responsible.	
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	<p>A tenant-only Scrutiny Group reviewed the quality and compliance of responses to Stage 2 complaints in February/March 2024 and reported findings to CX Committee May 2024. Their finding was that both compliance with policy and quality of responses is good.</p> <p>Complaints are processed to the manager of the relevant service and copied to the relevant 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.</p>	

			<p>Investigation involves investigating managers contacting the complainant and ensuring they have a fair chance to set out their position as referenced in section 7.2 of WCHG Complaint Policy 2024</p> <p>Complaint handling training sets out these expectations for complaint handlers.</p>	
5.9	<p>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.</p>	Yes	<p>Where a complaint falls outside the required timescales set out in the Code WCHG will agree an extension of time with the customer and confirm this in writing. We will include contact details for the Housing Ombudsman Service in this written communication. Referenced section 8.4 & 8.5 of WCHG Complaint Policy 2024</p>	
5.10	<p>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.</p>	Yes	<p>We keep a central record of reasonable adjustments made as part of the complaint handling process and will ensure any information relating to disabilities or additional needs is recorded in the wider housing management system at the customers agreement.</p>	

			Our approach is outlined in section 10.5 of WCHG Complaint Policy 2024	
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	2023-2024 data: <ul style="list-style-type: none"> • 0 refusals to escalate • 64 complaint escalated to stage 2 	
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	We record & retain: The original complaint including date received, all communication with the resident, internal or third-party communication regarding the complaint & any other documentation related to the complaint.	
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	The Customer Feedback Team triage all complaints & establish the desired outcome if it is not clear & this is shared with the investigating manager. Where the Customer Feedback Team can provide the remedy to a complaint quickly, they will do this e.g. rearranging an appointment or offering	

			<p>straightforward compensation that has been requested.</p> <p>Complaints processed at stage one & stage two are shared with the next level of management to encourage discussion regarding remedies to complaints and to ensure early complaint resolution.</p>	
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	<p>Customer-Conduct-Policy-April-2024</p>	
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	Any restrictions are subject to assessment by a panel of colleagues and Group Leadership Team approval.	

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	<p>The Customer Feedback Team triage all complaints & will assess those that may be considered 'quick fix' & those that require further investigation, referenced in section 8.1 & 8.2 of the policy WCHG Complaint Policy 2024</p> <p>The Customer Feedback Team are skilled to be able to identify complex complaints or where residents are vulnerable or at risk, they will refer these complaints for investigation where required.</p>	
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>	No	<p>Complaints are acknowledged, defined & logged within five working days of the complaint being received. Referenced section 7.7 of WCHG Complaint Policy 2024</p> <p>2023-2024 data</p>	<p>Additional measures being introduced to reduce the probability of future errors:</p> <ul style="list-style-type: none"> • Compulsory training for all managers handling complaints

			<ul style="list-style-type: none"> 99% of complaints were acknowledged within 2 working days One stage 1 complaint raised on 8th January 2024 was not acknowledged until HOS notified on 2nd May 2024 	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	<p>2023-2024 data</p> <ul style="list-style-type: none"> 387 stage one complaints Of these: <ul style="list-style-type: none"> 326 had a full response within 10 working days (84%) 57 had a full response within 20 working days (15%) <p>Four stage one complaints had a full response within 23,34, 86 & 211 working days (1%) Two of these were as a reasonable adjustment at customer request; Complaint 1 – the customer had a disabled child & requested a visit after a certain time period to assess work to resolve a complaint Complaint 2 – the customer suffered with severe anxiety and struggled to engage or allow</p>	<p>Additional measures being introduced to reduce the probability of future errors:</p> <ul style="list-style-type: none"> Compulsory training for all managers handling complaints Complaint handling objective for all managers handling complaints Two new complaints officers who will: check the complaint definition and resolution sought with the customer; resolve any 'quick fix' complaints; chase complaint responses if required; check responses have covered all aspects of the complaint;

			<p>access for an independent surveyor to assess work required</p> <p>A third complaint was received on 8th Jan 2024 but not responded to as a complaint by the officer who received it until 2nd May 2024 when highlighted by Housing Ombudsman. Response was issued on 10th May (86 days).</p> <p>A fourth complaint was responded to by WCHG but issued incorrectly via email therefore the customer did not receive it – this did not comply with the Housing Ombudsman timescales (211 days).</p> <p>Where an extension beyond 10 working days is required, the Customer Feedback Team notifies the customer & issues an interim response and includes the Housing Ombudsman Service contact details.</p>	<p>issue the response; and track actions</p> <ul style="list-style-type: none"> • Improved system introduced with reminders and improved visibility of complaint progress
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	Yes	<p>Referenced in section 8.3 of WCHG Complaint Policy 2024</p> <p>When an extension goes beyond a further 10 working days this will</p>	

	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.		be by exception, at the request of the customer and confirmed in writing.	
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	Where an extension beyond 10 working days is required, the Customer Feedback Team notifies the customer & issues an interim response and includes the Housing Ombudsman Service contact details.	
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	Complaint responses are issued in line with Code timescales once an investigation is complete. The Customer Feedback Team proactively ensures that managers do not delay responses to ensure actions arising are completed first. Outstanding actions are tracked & monitored by the Customer Feedback Team and regular updates provided to the resident.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	A Complaint Handling Toolkit has been developed by our internal Complaint Quality Network and includes a complaint response template to support managers,	

	policy, law and good practice where appropriate.		<p>top tips for writing responses and complaint resolution guidance.</p> <p>New for 2024: the Customer Feedback team will check responses before they are sent to ensure all points are covered.</p>	
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	<p>We seek to encompass any new issues raised in the complaint response at stage one or two if no response has been issued to ensure a full response & resolution for the customer. Referenced in section 8.8 of WCHG Complaint Policy 2024</p>	
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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 	Yes	<p>A tenant-only Scrutiny Group reviewed quality and compliance of responses to all Stage 2 complaints in February/March 24 and reported findings to CX Committee May 2024. Their finding was that both compliance with policy and quality of responses is good.</p> <p>A Complaint Handling Toolkit has been developed by our internal Complaints Quality Network and includes a new standard letter</p>	

	<p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>		<p>template to support managers, top tips for writing responses, remedy examples and resolution guidance.</p> <p>Actions from complaint responses are tracked and monitored by the Customer Feedback Team on a weekly basis.</p> <p>Complaint response guidance is referenced in section 8.10 of WCHG Complaint Policy 2024</p> <p>2024-2025 Complaint Handling Training for all complaint handlers will further reinforce what is expected to ensure compliance with this Code.</p> <p>Stage 1 standard final paragraph <i>–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</i></p>	
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			<p><i>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.</i></p>	
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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	<p>Referenced in section 9.2 of WCHG Complaint Policy 2024</p> <p>2023-24 Data</p> <ul style="list-style-type: none"> • 0 refusals to escalate • 64 escalations to stage two 	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	<p>Referenced in section 9.3 of WCHG Complaint Policy 2024</p> <p>2023-2024 data</p> <p>100% of stage 2 complaints were acknowledged within 2 working days</p>	
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	Yes	<p>2023-24 Data</p> <ul style="list-style-type: none"> • 0 refusals to escalate • 64 escalations to stage two 	

	understand why a resident remains unhappy as part of its stage 2 response.			
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	During 2023/24, all stage two complaints were assigned to the next level of management or an appropriate Senior Manager.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	No	<p>2023-2024 data 64 stage two complaints Of these:</p> <ul style="list-style-type: none"> • 40 were responded to within 10 working days (62%) • 23 were responded to within 30 working days (36%) <p>One Stage 2 complaint was responded to in 47 working days as a reasonable adjustment at the customer's request to accommodate a meeting with a third-party representative</p> <p>One Stage 2 complaint was responded to in 11 working days and therefore missed the required target date by 1 day and was recorded as out of target as no extension was issued (2%)</p>	<p>Additional measures being introduced to reduce the probability of future errors:</p> <ul style="list-style-type: none"> • Compulsory training for all managers handling complaints • Complaint handling objective for all managers handling complaints • Two new complaints officers who will: check the complaint definition and resolution sought with the customer; resolve any 'quick fix' complaints; chase complaint responses if required; check responses have covered all aspects of the complaint;

			<p>2023-2024 WCHG timescale for stage 2 complaints mirrored stage 1 of 10 working days</p> <p>2024-2025 timescale for stage 2 complaints now 20 working days.</p>	<p>issue the response; and track actions</p> <ul style="list-style-type: none"> • Improved system introduced with reminders and improved visibility of complaint progress
6.15	<p>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.</p>	Yes	<p>Referenced in section 8.3 of WCHG Complaint Policy 2024</p> <p>2023-2023 When an extension goes beyond a further 20 working days this will be by exception, at the request of the customer and confirmed in writing.</p>	
6.16	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	Yes	<p>Where an extension beyond 20 working days is required, the Customer Feedback Team notifies the customer & issues an interim response and includes the Housing Ombudsman Service contact details.</p>	
6.17	<p>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</p>	Yes	<p>Complaint responses are issued in line with Code timescales. When an investigation is complete the Customer Feedback Team proactively ensures that managers do not</p>	

	actioned promptly with appropriate updates provided to the resident.		<p>delay responses to ensure actions arising are completed first.</p> <p>Outstanding actions are tracked & monitored by the central Complaints Handling Team and regular updates provided to the resident.</p>	
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	A Complaint Handling Toolkit has been developed by our internal Complaints Quality Network and includes a complaint response template to support managers, top tips for writing responses and resolution guidance.	
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol 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 the Ombudsman 	Yes	<p>A tenant only Scrutiny Group reviewed quality and compliance of responses to all Stage 2 complaints in February/March 24 and reported findings to CX Committee May 2024. Their findings were that both compliance with policy and quality of responses is good.</p> <p>A Complaint Handling Toolkit has been developed by our internal Complaints Quality Network and includes a standard letter</p>	

	Service if the individual remains dissatisfied.		<p>template to support managers, top tips for writing responses, remedy examples and resolution guidance.</p> <p>Actions arising from complaint responses are tracked and monitored by the Customer Feedback Team on a weekly basis.</p> <p>Complaint response guidance is referenced in section 8.10 of WCHG Complaint Policy 2024</p> <p>2024-2025 Complaint Handling Training for all complaint handlers will further reinforce what is expected in a complaint response.</p> <p>Stage 2 standard final paragraph – <i>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.</i></p>	
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff	Yes	Stage 2 complaints reviews are conducted by senior managers &	

	members needed to issue such a response.		when processed are shared to Leadership Team to ensure key issues are highlighted and to encourage a focus on resolution.	
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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>Referenced in section 11.1 of WCHG Complaint Policy 2024</p> <p>Complaint Handling Toolkit available to all colleagues which has a catalogue of remedies & compensation guidance. Guidance within response templates to 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, changing policies, procedures or practices.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	The remedies guidance issued to WCHG managers within the Complaint Handling Toolkit is	

			<p>based on Housing Ombudsman Service guidance.</p> <p>2023-2024 – Total financial remedies issued for complaint resolution £31,086</p>	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	The Customer Feedback Team track & monitor actions from complaint responses to completion directly with managers/customers to ensure they are complete.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>The remedies guidance issued to WCHG managers within the Complaint Handling Toolkit is based on Housing Ombudsman Service guidance.</p> <p>Where legal redress is possible, WCHG provides relevant information to customers in complaint responses e.g. insurers details and where appropriate seeks legal advice to share with the customer.</p>	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <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><u>Annual-Complaints-Report-2023-24</u></p> <p><u>Board-comments-on-the-Annual-Complaints-Report-May-2024</u></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	Annual-Complaints-Report-2023-24 Board-comments-on-the-Annual-Complaints-Report-May-2024	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	WCHG Complaint Policy 2024	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	WCHG Complaint Policy 2024	
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	WCHG Complaint Policy 2024	

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	<p>Learning forms are mandatory for all upheld complaints - 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 colleagues via the Complaints Handling Network which meets monthly.</p> <p>Leadership Team regularly reviews complaint trends and learnings from complaints. This is supported by quarterly workshops with operational managers of areas with higher levels of complaints. The Member Responsible for Complaints reviews data and service improvements every quarter.</p>	

			<p>The WCHG Board and Customer Experience Committee receive a 6 monthly report & an annual report analysing complaints data and trends, as well as lessons learned.</p> <p>Learning 2023-2024 includes:</p> <ul style="list-style-type: none">➤ Domestic Abuse briefing delivered to Customer Hub Team➤ Reduced work issues to a specialist damp/mould contractor due to poor performance.➤ WCHG will now accept pest reports from third party callers in communal spaces to reduce risks associated with not treating➤ Changes/improvements to Accuserv job schedule system➤ Increased inspections on cleaning in blocks➤ Garden Boundary & Fencing policy reviewed➤ Change in process where ownership of a leak is disputed with United Utilities WCHG to resolve	
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			<p>to limit impact on customer</p> <ul style="list-style-type: none"> ➤ Introduced CCTV to monitor communal bin area, had a recycling day & paid for additional recycling collections ➤ A new external work completion card created for customers ➤ Internal/contractor meeting set up to learn about heat source pump heating systems ➤ Improved documentation of cleaning in blocks and increased spot checks ➤ A full review of the service charge calculation process ➤ Revised section 20 notification forms ➤ Communication to all residents in a multi storey dwelling regarding the use of recycling bins 	
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	Yes	<p>2023-2024</p> <p>Make Things Right Campaign workshops with managers in areas with higher levels of complaints</p>	

	introduce positive changes in service delivery.		<p>Workshops with Leadership Team to analyse complaint trends and identify options</p> <p>New Customer Conduct Policy developed</p> <p>New Complaints Policy developed</p> <p>Supporting Repairs & Maintenance with a dedicated Customer Feedback Team resource</p>	
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	<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 colleagues via the Complaints Quality Network which meets regularly.</p> <p>The WCHG Board and Customer Experience Committee receive annual reports analysing</p>	

			complaints data and trends, as well as lessons learned.	
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	Our Senior Lead Person as of May 2024 – Sarah Klueter, Director of Customer Experience During 2023/24 learnings have been used to inform the Business Transformation process and prototyping.	
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	Our MRC as of May 2024 is Board Member and Customer Experience Committee member– David Nuttall	
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	The Complaints Officer, Senior Lead Person & the MRC meet quarterly to review & analyse complaints performance information, trends & service improvements	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	During 2023/24 the MRC & Board received: <ul style="list-style-type: none"> Annual Customer Feedback report 	

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<ul style="list-style-type: none"> • The annual self-assessment • Outcomes of any Housing Ombudsman investigations <p>In addition, the MRC and 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 • Making Things Right Campaign action plan • Outcomes of any Housing Ombudsman investigations 	
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p>	Yes	<p>From 2024, all complaint handlers have a standard objective in relation to complaint handling.</p> <p>All complaint handlers receive complaint handling training in relation to our new policy which has been aligned to this Code</p>	

	<p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>Additionally, this objective is achieved through: setting of Groupwide values including a 'one team' approach the establishment of an internal Complaints Quality Network for teams to work together to drive service improvements</p>	
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