



Housing Ombudsman Complaint Handling Code

Self-Assessment Form: Accent Housing

This self-assessment has been completed by the complaints performance manager. It demonstrates our compliance with the Housing Ombudsman's Complaint Handling Code and our commitment to ensuring that our complaint handling is in line with Housing Ombudsman requirements. The icons below are used to show where we meet, partially meet or do not meet the requirements of the Code. We have developed an action plan to ensure that any areas of non-compliance are addressed. Links to the policies referenced in this self-assessment can be found here:

[Complaints and Compensation Policy](#)

[Equity Diversity and Inclusion Policy](#)

[Unacceptable Behaviour Policy](#) – coming soon

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	We meet the requirement
	We almost meet the requirement
	We do not meet the requirement

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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>		The Housing Ombudsman's complaint definition is clearly stated in the Complaints and Compensation Policy	
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.		This is clearly stated in the Complaints and Compensation Policy: <i>"Important</i> – a customer does not have to say they want to make a complaint for the issue to be dealt with in line with our complaints process. Colleagues should understand the difference between a complaint and a service request."	
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.		This wording is not specifically replicated in the policy.	Update wording in the policy to reflect this: <i>'...if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint'</i>

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.		Section 4 of the Complaints and Compensation Policy clearly sets the reasons why we may not accept a complaint.	
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.		Section 4 of the Complaints and Compensation Policy clearly sets out exclusions, explaining the reasons why we may not accept a complaint	
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.		If we do not accept a complaint, the reasons will be explained to the customer in line with section 4 of the Complaints and Compensation Policy.	Develop standard wording for when we cannot accept a complaint, to ensure compliance with the code

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		Definitions of each are explained in section 2 of the Complaints and Compensation Policy.	
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.		Transactional surveys are carried out when customers have used our services, including following the closure of a complaint. Currently we are not referencing information on how to make a complaint in our customer surveys.	Review of methodology for collecting customer satisfaction with complaint handling and routine monitoring of customer satisfaction across all service areas.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		The complaints and compensation policy explains the ways in which a customer can make a complaint: <ul style="list-style-type: none"> • By telephone. • Completing the on-line form. • In writing – e mail/by post. • In person. 	
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.		The complaint policy is available to view or download from the website. Our correspondence also states we will send a copy in the post if a customer requests it. The policy includes the stages of the complaints process, including what will happen and the timescales. This is replicated in complaint acknowledgement correspondence.	Further enhancements are planned for a more user-friendly, interactive version of the complaints policy to be made available to customers on the website.
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.		Information on how to raise a complaint is on the website, along with the complaints and compensation policy.	A customer friendly flowchart of the process is being developed.

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.		The complaints and compensation policy refers to the Equality Act 2010.	This will be included in the complaints training.
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.		The policy is published on the website. This includes the necessary detail for customers to understand the process for dealing with complaints.	Customer communication plan is in progress.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.		Stage 1 and Stage 2 responses include information about the Housing Ombudsman service, including contact details. Information is published on the website	
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.		This is included in the stage 1 and stage 2 responses	Consider how this can be included in other customer communications, and on the website.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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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.		The policy explains how we will deal with complaints made via social media. These will be referred to the relevant member of staff/team and dealt with through the complaints process.	
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Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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".		A Customer Liaison Team has been established to deal with formal repairs and maintenance complaints. For other service areas the relevant manager is responsible for all stage one complaints. A Complaints Performance Manager has been appointed.	Review how we are resourcing complaint handling/management outside of the Technical Hub.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.		All complaint handlers are trained to manage complaints	Training to be rolled out to reflect new process/system changes

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action required
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3.3	Complaint handlers should: <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. 		This forms part of the complaints training programme. MGI training has addressed the customer care aspect of customer service to ensure we handle customer issues sensitively and fairly.	Training roll-out to coincide with process and system changes. To include soft skills in line with MGI training as well as system training
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Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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 within five days of receipt.		We have removed early resolution from our complaints process. All communication with customers is recoded on CRM to ensure there is a chronological audit trail of all contact and decisions agreed.	The complaints training will include emphasis on the importance of knowledge and information management.
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		System generated letters are appropriately worded	Need to ensure case owners are including this in the acknowledgement letter – standard wording includes this. To be

	clarification and the full definition agreed between both parties.			reiterated in complaints training
4.6	A complaint investigation must be conducted in an impartial manner.		This is explained in complaint handling principles in the procedure	
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. 		Written into the complaint handling procedure	This will be reiterated in the complaints training
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication		This is referred to in the procedure.	This will be reiterated in complaints training.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position. • comment on any adverse findings before a final decision is made. 		This should form part of the disciplinary/grievance process.	To be added to the procedure reiterated in the complaints training.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.		This is written into the policy and stage 1 response.	
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		Policy includes reasons for not accepting a complaint. System generated stage 1 response explains the timescale for	Refusals to be included in training.

	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.		requesting an escalation but makes clear we will not refuse to escalate of the complainant is unable to respond in the timescale.	
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.		All contact is recorded on CRM and attached to the complaint case to ensure there is a chronological record, and a full case history. All correspondence is attached to the complaint case	This will be included in the complaint training.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.		Draft unacceptable behaviour policy is in consultation.	Policy to be presented at Customer Experience Committee in October 2023.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic		Policy, procedure and MGI training have all referred to this.	Updated procedure to include this wording
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.		Policy and procedure	
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.		This is set out in the complaints policy	

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.		This is set out in the policy	
4.9	Communication with the resident should not generally identify individual members of staff or contractors.		Unless the issue is in relation to a particular contractor or colleague as identified by the complainant.	
4.10	Landlords should keep residents regularly updated about the progress of the investigation.		This is a requirement of the policy and procedure and should be monitored by managers of complaint handlers	This will be covered in complaints training
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.		All customers are surveyed following closure of their complaint in relation to complaint handling.	
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		Our complaints culture is that complaints are learning opportunities and we can evidence learning from complaints in the review of our Repairs Responsibilities Guidance and the Defects Policy.	This is a focus of the complaints training – reputational risk, financial risk
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.		This is explained in the Unacceptable Behaviour Policy and Procedure	The policy will be published on it has been approved.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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5.1	Landlords must respond to the complaint within 10 working days 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.		This is set out in the Policy and Procedure	
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.		This is set out in the Policy and Procedure	
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.		Standard letter templates cover this requirement	
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 		Standard letter templates cover this requirement	

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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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.		This is set out in the policy and procedure	
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding 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.		This is set out in the policy and procedure and is included in standard letter templates	
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.		This is set out in the policy and procedure	
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.		As stated in the policy and procedure stage 2 review are conducted by a head of service or director.	
5.13	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.		This is set out in the policy and procedure	
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition 		This is set out in the policy and procedure and is included in standard letter templates	

	<ul style="list-style-type: none"> 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. 			
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		Policy has been reviewed. Our complaints process has two stages.	
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"> 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 	N/A	N/A	

	<ul style="list-style-type: none"> • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 			
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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.		Policy and procedure refer to 10-day extension and the need to agree with the customer.	Wording to be updated in the procedure.
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.		This is not currently referred to in our policy or procedure.	Wording to be updated in the procedure to reflect this.
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.		Our complaint handling procedure requires us to look at the complaint history for any previous complaints.	
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		We take into consideration any additional issues raised by the customer that are relevant to the complaint and will include them in the stage 1 response.	Check wording is clear

	complaint should be logged as a new complaint.			
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		The policy and procedure refer to 10-day extension.	Wording to be updated in the procedure to reflect this.
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		This is not currently referred to in our policy or procedure.	Wording to be updated in the procedure to reflect this

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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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.	N/A	N/A	
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.	N/A	N/A	

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a		This is reflected in our policy, procedure and standard letter templates.	

	landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.			
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.		Remedies offered are in line with Housing Ombudsman 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.		This is reflected in our policy, procedure and letter templates.	There is some evidence that we have not followed up when a remedy has been offered and a customer has not responded (eg the offer of a compensation payment).
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.		This is reflected in our Complaints and Compensation Policy.	

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		We use learning from complaints to change how we do things, for example we have reviewed the Defects Policy and the	

			Repairs Responsibility guidance.	
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.			

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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.		Reported in annual report, to Senior Leadership Team and Customer Experience Committee.	

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
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		We have a named representative on the Accent Board	

	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"> • 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. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		Included in reports to Customer Experience Committee	
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.		Included in reports to Senior Leadership Team	

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <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. 			Complaints training as part of the induction process and ongoing complaints e-learning requirements would address this.
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Action Required
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.		This is published annually on website.	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.		This self-assessment also follows recent changes to our housing services structure.	

8.3	<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>This is referred to in our annual report. Draft self-assessment to be approved by Executive Team and Customer experience Committee prior to publication.</p>	