

Appendix B – Self-Assessment Form

June 2023

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	We have adopted this definition of a complaint in our Customer Complaints Policy which is published on our website.
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	Our Customer Complaints Policy outlines that a customer does not have to use the word 'complaint' for it to be treated as such. We can evidence through an audit of complaints received that complaints are accepted where the word 'complaint' is not used. Our Customer Complaints Policy also outlines that a complaint can also be

			<p>submitted by third parties and/or representatives. We can evidence through an audit of complaints received via a third party that these complaints are handled in line with our policy.</p> <p>Training in our new complaints policy will be rolled out across whg and this message reinforced.</p>
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	<p>We have an early resolution process (Escalated Service Requests) for smaller issues that can be quickly sorted out. Our Customer Complaints Policy outlines that any colleague receiving an ESR should discuss options for resolving the customer's dissatisfaction, including making a formal complaint.</p> <p>Our internal complaints training/coaching also reflects this statement, with colleagues informed that complex matters requiring further investigation or particularly serious matters involving a health and/or safety issue, must always be logged as a formal complaint.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>There are certain matters that we would not consider as a complaint. These are detailed in our Customer Complaints Policy and are limited to a small number of circumstances outlined in section 2.11 of the policy.</p>
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered,	Yes	<p>Matters that would not be considered as a complaint are outlined in section 2.11 of our Customer Complaints Policy and are</p>

	and these circumstances should be fair and reasonable to residents.		in line with guidance from the Housing Ombudsman Service.
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	We provide detailed explanations to our customers when a complaint is not accepted and outline the reasons for our decision. We also provide the customer with the Housing Ombudsman's contact details, so if dissatisfied, they can challenge our decision.

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	Our Customer Complaints Policy gives examples of service requests which would not be considered a complaint, including complaints from customers regarding ASB. Internal complaints training/coaching also reiterates the difference between a request for service and a complaint about the service.
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.	Partial	We pro-actively follow up dissatisfaction feedback, with the view to resolving the concerns raised. Future training for colleagues responding to dissatisfaction feedback will be given to ensure the complaint process is explained to customers.

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	Complaints can be made in the following ways; <ul style="list-style-type: none"> • In person; • Via telephone; • In writing; • Digitally, details of which can be found on our website.
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	Our Customer Complaints Policy is published on our website alongside a dedicated complaints page, that details the number of stages in our complaints process and the timescales for responding. We have accessibility tools on our webpage to enable customers to translate, increase font size or have the complaints information spoken out loud.
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	Link to our Feedback and Complaints webpage is included on the front page of our website under 'I am a customer'.
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	AN Equality Impact Assessment was carried out when our Complaints Policy was reviewed. This will be reviewed annually and when any changes are made to the policy. We routinely ask customers to notify us if they require any adjustments to support them through the complaints process and adjustments are made when identified or requested by customers. Any

			complaints relating to non-compliance with the principals of the Equality Act are referred to our Head of Inclusion and Organisational Culture for an independent and expert review.
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	This is included on our website, social media and in our Round Your Way customer magazine. We also have complaints leaflets available to customers in the reception of our main offices and our Community Housing Officers carry leaflets to hand out to customers during their duties.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Information regarding the Housing Ombudsman Service is included on our Feedback and Complaints Webpage and on our complaints leaflets. In addition to this, all standard complaints correspondence (acknowledgments and responses) includes contact details for the Housing Ombudsman.
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	Our standard complaint acknowledgment letter advises customers of their right to access the Housing Ombudsman Service including details of how to contact them. All subsequent complaint correspondence also includes this information. Customers are also advised of how to contact the Ombudsman at any stage where they express dissatisfaction with the complaints process.

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	Our Social Media Policy details what steps will be taken when a complaint is made over social media. Complaints made via social media are passed to the Customer Service team to action in the same way we action all complaints received via Customer Services. Confidentiality is maintained by taking the conversation with the customer offline or via DM.

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	We have a dedicated Customer Experience Team who take responsibility for complaint handling. They provide advice, training and support across the business to ensure consistency of approach. Complaints are reported to our governing body (Board and Customer Services Oversight Committee) on a quarterly basis as part of our Customer in The Room report. We have a member of our Board who is responsible for scrutinising the complaints process and also sits on the Customer Services Oversight Committee.

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Customer Experience Team have all received extensive training on how to resolve complaints effectively. The team sit in our Business Excellence Directorate so can maintain a degree of independency from the service areas subject to the complaint.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. 	Yes	The Customer Experience Team have all received training in how to resolve complaints effectively, with sensitivity. The team are highly experienced and share best practice. The team have the autonomy to resolve disputes and have access to all senior stakeholders as well as frontline staff to ensure they can resolve complaints quickly.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the	Yes	If a customer contacts us with a concern, we ask them what they would like us to do to resolve the issue. For simpler issues that do not require further investigation to resolve, we give the customer the option

	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 .		of raising an Escalated Service Request. We also provide the customer with the option of raising a formal complaint and the customers preference is recorded on CRM. We operate a two stage complaints process as per the guidance.
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 have a standard acknowledgement template for all complaints which sets out our understanding of the complaint and the resolution the customer is seeking.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Any conflicts of interest are avoided, and all complaint investigations are undertaken or overseen by a Customer Experience colleague who works independently from the service area subject to the complaint.
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	Training is focussed on ensuring complaints are handled under these principles which are outlined in our Complaints Procedure.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We can evidence how we have adapted our approach to customers' requests for communication.
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:	Yes	This forms part of the investigation process and we can evidence how we have spoken to staff and residents to

	<ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 		understand their viewpoint prior to issuing a complaint response.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Our Customer Complaints Policy sets out clear timescales for customers to escalate their complaint (28 days). This information is also included as standard as part of our Investigation stage (stage 1) complaint 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 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	We do not refuse to escalate complaints through all stages of our complaints process unless an exclusion applies. Exclusions are the same as the reasons for not accepting a complaint as outlined in our Customer Complaints Policy.
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	MIS case processing (HPM) records details of each step within each stage of the complaints process. Copies of correspondence to and from the customer are saved on our shared drive in a case folder clearly marked with the customers complaint reference number and address.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We have an Acceptable Behaviour Policy in place.

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	This is completed within the initial conversation with the customer and during face to face visits. Our

			compensation matrix provides colleagues with guidance to support these conversations.
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	Any actions or repairs required as part of the resolution to the customers complaint are raised during the early stages of the investigation in order to reduce any further delays in completion.
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	This is outlined within our Customer Complaints Policy and at the request of the complainant.
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	whg have a Legal Services team who support with any complaints relating to legal obligations.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Where necessary, colleagues who have been in direct contact with the customer may be identified in communication to support clarity and understanding, however blame is not apportioned to a particular individual with service failure being attributed to whg rather than individuals or contractors.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Customers are issued with a formal acknowledgement at each stage of their complaint outlining when they can expect to receive a response. If for any reason we are unable to meet these timescales customers are issued with a formal notification of extension.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of	Yes	Survey feedback specifically relating to complaints started in November 2022 in

	the drive to encourage a positive complaint and learning culture.		line with the new Tenant Satisfaction Measures.
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	Our new lessons learnt process was launched in Q3 2022/23 and we are continuing to work towards strengthening this process. We also conducted a lesson learnt workshop with key stakeholders in Q4 2022/23 to support engagement in the process.
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	Demonstrated within our Acceptable Behaviour Policy.

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	If an extension is required, customers receive a formal notification including an explanation, and details of when they can expect to receive a response. We only exceed a 10 day extension in exceptional circumstances, and this is agreed with the customer. If a customer does not agree with our request for an extension exceeding 10 days, we inform them of their right to refer their case to the Housing Ombudsman.

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	Once a resolution is agreed a response is sent to the complainant including details of any outstanding actions/work and dates for completion. Outstanding actions/work are added to a tracker which is monitored by our Customer Experience Assistant.
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	We provide comprehensive responses to complaints and utilise templates provided by the Housing Ombudsman Service to capture the information in a structured format. We reference relevant policy, law and good practice where appropriate.
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	Our stage 1 complaint responses adhere to this guidance with all complainants receiving a letter or email including details of the investigation findings, proposed resolution and information regarding how to escalate their complaint if they remain dissatisfied.

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	The same exclusions apply to escalations as those that apply for accepting complaints outlined in our Customer Complaints Policy. If we refuse to escalate a complaint in line with these exclusions, we write to the customer to explain our decision and inform them of

			their right to refer their case to the Housing Ombudsman.
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.	Yes	We issue a formal acknowledgement of all stage 2 complaints outlining our understanding of the issues outstanding and outcome sought. On occasions where the reasons for escalation are unclear, we will contact the customer for clarification before issuing the acknowledgement.
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	We only escalate complaints following completion of a stage 1 investigation and at the customer's request. This is outlined in our Customer Complaints Policy.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	The colleague considering the complaint at stage 2 will always be in a more senior position to the colleague who responded at stage 1. This process is outlined in our Customer Complaints Policy.
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	We currently monitor compliance with timescales through our Formal Complaints Tracker. If an extension is required, customers receive a formal notification including an explanation, and details of when they can expect to receive a response. We only exceed a 10 day extension in exceptional circumstances, and this is agreed with

			the customer. If a customer does not agree with our request for an extension exceeding 10 days, we inform them of their right to refer their case to the Housing Ombudsman.
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	Our stage 2 complaint responses adhere to this guidance with all complainants receiving a letter or email including details of the investigation findings, proposed resolution and information regarding how to refer their complaint to the Housing Ombudsman if they remain dissatisfied.

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.	N/A	whg operate a two stage complaints process in line with the Complaint Handling Code recommendations.
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 	N/A	whg operate a two stage complaints process in line with the Complaint Handling Code recommendations.

	<ul style="list-style-type: none"> 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 		
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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	If an extension beyond 20 working days is required, this is agreed with the customer and confirmed in writing.
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	If a customer does not agree with our request for an extension, we inform them of their right to refer their case to the Housing Ombudsman and provide the relevant contact 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	As part of the investigation of complaints we collate a timeline of events. The timeline will include older reports of issues relevant to the current complaint. This is evidenced through our complaint responses.
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	This process is outlined in our Customer Complaints Policy.

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	If an extension beyond 10 working days is required, this is agreed with the customer and confirmed in writing.
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	If a customer does not agree with our request for an extension, we inform them of their right to refer their case to the Housing Ombudsman and provide the relevant contact 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.	N/A	We do not have a third stage in our complaints process.
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	We do not have a third stage in our complaints process.

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	We can evidence through our complaint responses that we acknowledge where something has gone wrong and what actions we have taken or intend 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.	Yes	We have a Compensation Matrix to support colleagues in calculating a fair and reasonable offer of financial redress, reflective of the extent of any service failure. Our Customer Experience team are experienced in managing expectations.
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	This can be evidenced through our complaint responses and resolution action tracker.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	This is included in our Compensation Matrix.

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	Our lessons learnt process seeks to identify areas for improvement across the wider business.

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	whg have a Legal Services team that support and advise on complaints where a customer has a legal entitlement.
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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	Lessons learnt are reported to our governing body (Board and Customer Services Oversight Committee) on a quarterly basis as part of our Customer in The Room report which is shared with our engaged customers. Our Annual Report outlines actions we have taken based on feedback and learning from complaints.

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	The Chair of our Customer Services Oversight Committee has lead responsibility for complaints and also sits on the Board.
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, 	Yes	The Customer in the Room report is produced quarterly and is shared with the Customer Service Oversight Committee and Board. This report includes information re. volumes of complaints, trends and the outcomes of lessons

	<ul style="list-style-type: none"> • 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. 		<p>learned reviews. All finding from the HOS are shared with both the Customer Service Oversight Committee and Board, including tracking of actions. Information and reports produced by the HOS is shared and a gap analysis on recommendations provided to determine next steps for compliance. The self-assessment is shared for scrutiny and challenge.</p>
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	<p>Trends and actions relating to them are discussed as part of Customer in The Room, which is a report and meeting which takes place with GEXEC, the Customer Service Oversight Committee and Board. All stage 2 complaints are reviewed by the Director of Business Excellence to ensure appropriate remedial action is taking place on a case basis as well as theme basis.</p>
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. 	No	<p>whg introduced a performance management framework in May 2023. As part of this process we will determine whether it is appropriate for all colleagues to have a standard objective in relation to complaints handling. All colleagues whose role involves management of complaints do have a standard objective to ensure we manage complaints in compliance with the Complaints Handling Code. We will review whether it is appropriate to amend the colleague code of conduct to cover this best practice suggestion.</p>

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	This will be done on an annual basis at the end of each financial year.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will be completed as and when appropriate.
8.3	Following each self-assessment, a landlord must: <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	Yes	<p>The Executive Management Team and Board will have sight of the self-assessment.</p> <p>The self-assessment will be published annually on whg's website.</p> <p>A link to the self-assessment will be included in our Annual Report.</p>