

## Appendix B – Self-Assessment Form

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

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

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

### Section 1 - Definition of a complaint

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>Customer Feedback Policy and Procedure: Section: 3.2.2 , 4.6.1 and 4.6.2</p> <p>3.2.2: Complaint: 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</p> <p>4.6.1 : A complaint is defined above at 3.2.2. This is the Housing Ombudsman’s definition of a complaint which generally refers to situations where we have fallen below our core Service Standards:</p> <p>4.6.2: Examples of a complaint could include: • Failure to provide a service in</p>

			<p>accordance with our policies or Service Standards;</p> <ul style="list-style-type: none"> <li>• Unacceptable quality of work or service;</li> <li>• Delays in responding to an enquiry, in providing a service or completing work.</li> <li>• A failure to provide information or providing the wrong information;</li> <li>• Unacceptable behaviour or attitude of a staff member or contractor; or</li> <li>• A complaint about unfairness e.g. of a policy or procedure.</li> </ul>
<b>1.3</b>	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	<p>Customer Feedback Policy and Procedure: Section: 3.2.2 and 4.6.1</p> <p>3.2.2: Complaint: 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</p> <p>4.6.1 : A complaint is defined above at 3.2.2. This is the Housing Ombudsman's definition of a complaint which generally refers to situations where we have fallen below our core Service Standards:</p>
<b>1.6</b>	... 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>Customer Feedback Policy and Procedure: Section: 3.2.2 and 4.6.1</p> <p>3.2.2: Complaint: An expression of dissatisfaction, however made, about the</p>

			<p>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</p> <p>4.6.1 : A complaint is defined above at 3.2.2. This is the Housing Ombudsman's definition of a complaint which generally refers to situations where we have fallen below our core Service Standards:</p>
<b>1.7</b>	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>Within our Customer Feedback Policy and Procedure we have stated the reasons why we may not accept a complaint in sections 4.6.3 and 5.3.2</p> <p>4.6.3: What is not a complaint?</p> <ul style="list-style-type: none"> <li>• Dissatisfaction with levels of rent or service charges – if you're unhappy about these please discuss this with our Customer Services team;</li> <li>• A first request for a service (e.g. a repair) or general follow-up enquiries about the status of that request;</li> <li>• An explanation of a policy, practice or decision;</li> <li>• A report (itself) of anti-social behaviour about a neighbour (we have a separate Anti-Social Behaviour Policy &amp; Procedure to deal with this) although dissatisfaction with our handling of an ASB case could be considered a complaint;</li> </ul>

		<ul style="list-style-type: none"><li>• Dissatisfaction with legal or legislative requirements (which we are not responsible for) e.g. local authority nominations processes;</li><li>• A matter which is already being dealt with under our internal Complaints Procedure (section 5 below) or the External Complaints Procedure (section 6); and</li><li>• Dissatisfaction with something arising more than six months ago – it would be at our discretion whether or not to deal with this under our Complaints Procedure.</li></ul> <p>5.3.2: We reserve the right not to accept an Appeal where: -</p> <ul style="list-style-type: none"><li>• The appeal is not sufficiently detailed or clear;</li><li>• No new evidence is being submitted beyond that already considered;</li><li>• We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter;</li><li>• We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit;</li><li>• We consider that the complaint is vexatious or otherwise unreasonable; or</li><li>• The customer has surpassed the ten day deadline and an additional ten day extension deadline where required (see 5.3.1 above).</li></ul>
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<p><b>1.8</b></p>	<p>A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.</p>	<p>Yes</p>	<p>Within our Customer Feedback Policy and Procedure we have stated the reasons why we may not accept a complaint in sections 4.6.3 and 5.3.2</p> <p>4.6.3: What is not a complaint?</p> <ul style="list-style-type: none"> <li>• Dissatisfaction with levels of rent or service charges – if you're unhappy about these please discuss this with our Customer Services team;</li> <li>• A first request for a service (e.g. a repair) or general follow-up enquiries about the status of that request;</li> <li>• An explanation of a policy, practice or decision;</li> <li>• A report (itself) of anti-social behaviour about a neighbour (we have a separate Anti-Social Behaviour Policy &amp; Procedure to deal with this) although dissatisfaction with our handling of an ASB case could be considered a complaint;</li> <li>• Dissatisfaction with legal or legislative requirements (which we are not responsible for) e.g. local authority nominations processes;</li> <li>• A matter which is already being dealt with under our internal Complaints Procedure (section 5 below) or the External Complaints Procedure (section 6); and</li> <li>• Dissatisfaction with something arising more than six months ago – it would be at</li> </ul>
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			<p>our discretion whether or not to deal with this under our Complaints Procedure.</p> <p>5.3.2: We reserve the right not to accept an Appeal where: -</p> <ul style="list-style-type: none"> <li>• The appeal is not sufficiently detailed or clear;</li> <li>• No new evidence is being submitted beyond that already considered;</li> <li>• We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter;</li> <li>• We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit;</li> <li>• We consider that the complaint is vexatious or otherwise unreasonable; or</li> <li>• The customer has surpassed the ten day deadline and an additional ten day extension deadline where required (see 5.3.1 above).</li> </ul>
<b>1.9</b>	<p>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.</p>	Yes	<p>Within our stage 1 and stage 2 decline letters we will provide reasons to why we have not accepted the customer. This is reference to our Customer Feedback Policy section 4.6.3 and 5.3.2.</p> <p>WCH state in all letters responding to customer feedback the right to escalate to the Housing Ombudsman.</p>

## 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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	<p>Customer Feedback Policy and Procedure Section: 3.2.2, 3.2.3, and 4.7.1 that defines Complaints and Grumbles.</p> <p>3.2.2: Complaint: 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.</p> <p>3.2.3: Grumble: a dissatisfaction with our service which does not result in a complaint.</p> <p>4.7.1: Customers may submit a 'Grumble' (as defined above at 3.2.3 and also known as 'General Feedback') where they do not wish to go through the full complaint process but want to inform us that they are dissatisfied with our service. Where a customer submits a Grumble, we will log their feedback on Orchard and respond within 3 working days.</p>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	The Customer Resolutions Team responds to all survey feedback. They contact all customers who are dissatisfied with our services to discuss feedback with

			the aim to rectify or will advise the customer of our complaints process.
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## 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	<p>Customer Feedback Policy and Procedure: Section: 4.1.1 . Customers can give us feedback in a number of ways:</p> <ul style="list-style-type: none"> <li>• In person: To any member of our staff</li> <li>• Digital Service: Register at <a href="http://www.myaccount.wcht.org.uk/WCH/www/login">www.myaccount.wcht.org.uk/WCH/www/login</a></li> <li>• By telephone: 0800 218 2247 / 01923 209000 Online:</li> <li>• Via our website: <a href="http://www.wcht.org.uk/feedback">www.wcht.org.uk/feedback</a>; or through our social media platforms, Facebook, Instagram and Twitter.</li> <li>• By email: <a href="mailto:feedback@wcht.org.uk">feedback@wcht.org.uk</a></li> <li>• In writing to: Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA</li> </ul>



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	Customer Feedback Policy and Procedure: Section: 5 details our two stage complaints procedure and timescales. The policy is available through our website: <a href="http://wcht.org.uk">Our policies   Watford Community Housing (wcht.org.uk)</a> and can be provided to customers in a paper base format.
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	The Customer Feedback Policy and Procedure is available through our website: <a href="http://wcht.org.uk">Our policies   Watford Community Housing (wcht.org.uk)</a> and can be provided to customers in a paper base format.
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	Customer Feedback Policy and Procedure: Section: 4.1.2: Customers can request for reasonable adjustments when providing feedback to us. WCH will accommodate all requests so far as possible in accordance with the Equality Act 2010 and our Translation & Interpretation Policy. Where customers are considered vulnerable, they will be treated in accordance with our Vulnerable Customers Policy.
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	Our Customer Feedback Policy and Procedure, Complaint Handling Code Assessment and information on how to progress issues to the Housing Ombudsman is available on our website.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Customer Feedback Policy and Procedure: Section 1.5.: The Housing Ombudsman can provide free, independent, and impartial assistance throughout the life of a complaint and all WCH customers have a right to access the Housing Ombudsman Service by calling 0300 111 3000 or emailing <a href="mailto:info@housingombudsman.org.uk">info@housingombudsman.org.uk</a> . For more information, customers can visit their website at <a href="https://www.housing-ombudsman.org.uk/">https://www.housing-ombudsman.org.uk/</a>

			We state customers rights to contact the Housing Ombudsman in all correspondences to our customers who have raised a complaint.
<b>2.8</b>	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	Customer Feedback Policy and Procedure: Section 1.5. We state customers rights to contact the Housing Ombudsman in all correspondences to our customers who have raised a complaint.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>2.2</b>	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	Customer Feedback Policy and Procedure: Section: 4.1.1 and 4.1.3. Where customers provide feedback via our social media platforms, the Communications Team will direct the feedback to our Customer Resolutions Team who will handle it accordingly following the Customer Feedback Policy and Procedure: Section: 5.

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>3.1</b>	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	Our Customer Resolutions Team are responsible for handling all complaints and customer feedback.

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All Customer Resolution Officers and Investigating Managers have completed the Housing Ombudsman Dispute Resolution e-learning modules. Conflicts of Interest are declared annually.
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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"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	All staff / Customer Resolution Officers have access to: Creating a positive complaint handling culture guide. This guide details how to handle complaints. The Customer Resolutions Team collaborates with all investigating managers at any management level to carry out a detailed and fair investigation.

## 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 complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages	Yes	All communication / correspondences are recorded on our MRI Housing Management System through our Customer Feedback Module. As per our Customer Feedback Policy and Procedure: Section: 5, WCH have a two stage complaints process. When a

	(such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b> .		complaint is recorded it will be acknowledged within 1 working day.
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	The Customer Resolutions Officer contacts the customer to confirm they have understood the complaint and requests any supporting evidence as part of the investigation. A brief summary of the complaint and a list of concerns are detailed within the acknowledgment letter.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Conflicts of Interest are declared annually by all staff members.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	The complaint handler has access to: Creating a positive complaint handling culture guide. This guide details how to handle complaints. Conflicts of Interest are declared annually by all staff members. All complaint information is kept confidential and only disclosed when necessary. All complaint correspondences are recorded and retained with our Customer Feedback Module.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	As per our Service Standards we will: <ul style="list-style-type: none"> <li>• We will acknowledge written correspondence (including emails) that require a response within two working days. We will adhere to the rules laid out in our Customer Feedback Policy</li> </ul>

			<ul style="list-style-type: none"> <li>● We will reply to all letters within five working days of their receipt. If we cannot provide a full response within that time, we will tell you why and keep you fully informed at all times. We will make it clear what we can do and when we will do it.</li> <li>● Calls should be directed through our call centre, but we understand that you will sometimes want to speak to a specific staff member. We will ensure that our staff tell you if they are out of the office. All phone messages will be returned within two working days of the staff member getting back into the office.</li> <li>● In some circumstances a tenant may request to have a face-to-face meeting or a home visit. If appropriate we will ensure that you are offered a choice of appointment times that suit your needs</li> <li>● All complaint correspondences are recorded and retained with our Customer Feedback Module.</li> </ul>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>● set out their position</li> <li>● comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>The complaint handler / investigating manager will contact the customer by phone in the first instant to understand the concerns of the complaint and obtain any evidence. If the complaint relates to a staff member they will also be contacted by the investigating manager by phone or invited to a meeting to discuss the complaint. A full and factual investigation will take place</p>

			before the investigating manager provides an outcome.
<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Customer Feedback Policy and Procedure: Section: 5.3.1 . Customers can appeal their complaint to stage two within ten days of receiving their stage one response. In some cases, customers may be able to request a further ten-day extension to appeal which is dealt with on a case by case basis.
<b>4.14</b>	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Customer Feedback Policy and Procedure: Section: 5.3.2. We state the reasons we reserve the right not to accept an appeal.
<b>4.15</b>	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	All complaint correspondences / information is recorded and retained with our Customer Feedback Module.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Persistent or Unreasonable Behaviour Policy, which is appended to our Customer Feedback Policy and Procedure at Appendix 2

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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<p><b>4.3</b></p>	<p>Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic</p>	<p>Yes</p>	<p>The Customer Resolutions Officer / Investigating Manager will always ask the customer how they feel we can resolve the complaint. If the outcome is unreasonable or unrealistic this will be discussed with the customer and detailed within the response at stage one / stage two. All complaint correspondences / information is recorded and retained with our Customer Feedback Module.</p>
<p><b>4.4</b></p>	<p>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.</p>	<p>Yes</p>	<p>Customer Feedback Policy and Procedure : Section 5.2.2:  A WCH Team Manager will carry out the initial investigations. We would then aim to resolve the complaint the same working day if a quick solution can be found. If not, we would look to resolve the issue within a maximum of ten working days, starting from the date the complaint was first logged. If the problem has been resolved within this timescale, we will agree with you that the complaint can be closed but if there are things outstanding e.g. repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale.</p> <p>A goodwill gesture may be offered early to put things right.</p>

<p><b>4.5</b></p>	<p>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.</p>	<p>Yes</p>	<p>Customer Feedback Policy and Procedure: Section: 3.2.4, 5.2.4 and 5.3.8.</p> <p>3.2.4: Customer Representative: refers to a person who represents the customer raising the complaint throughout the complaint process. Customers have the opportunity to have a representative deal with their complaint on their behalf.</p> <p>5.2.4: As 3.2.4, customers are entitled to request for a customer representative to deal with the complaint on their behalf.</p> <p>5.3.8: Customers appealing their complaint to Stage 2 will also have the opportunity to request for a customer representative as set out above at 5.2.5</p>
<p><b>4.8</b></p>	<p>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.</p>	<p>Yes</p>	<p>Customer Feedback Policy and Procedure: Section: 3.1.6: Under this complaints procedure, we are not able to deal with issues already being dealt with by a solicitor or legal advisor; these would be classed as a legal dispute and are therefore approached separately.</p> <p>Where a complaint relates to a tenancy or legal matter we will refer to the relevant policy and procedure and inform all parties of this outcome.</p>
<p><b>4.9</b></p>	<p>Communication with the resident should not generally identify individual members of staff or contractors.</p>	<p>Yes</p>	<p>We do not reference individual staff members or contractors within the</p>



			complaint unless they are part of the investigation. All complaints are signed off by the investigation manager who is identifiable.
<b>4.10</b>	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	All complaint correspondences / information is recorded and retained with our Customer Feedback Module
<b>4.16</b>	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>Within Quarter 3 and 4 we surveyed a portioned of customers: " How satisfied or dissatisfied are you with WCH's approach to complaint handling?"</p> <p>We also publish on our <a href="https://www.wcht.org.uk">How we're performing   Watford Community Housing (wcht.org.uk)</a> You Said, We Did... where we have improved our services based on customer feedback. A recent example – as an outcome of a recent complaint, we have updated our application for alterations form to include consultation with your neighbour regarding any improvements you wish to make to your home.</p>
<b>4.17</b>	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	<p>We meet regularly with the top 4 complaint areas teams to discuss lesson learned and enact service change.</p> <p>The Customer Experience Manager regularly completes training with Service Managers detailing "Creating a positive complaints-handling culture, a guide for managers on how to handle complaints"</p>

			A weekly complaints report is shared with the Leadership Team and Executive Manager Team.
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	This is set out in our Person UDC Policy and Procedure, these restrictions are reviewed to ensure they are reasonable and proportionate.

## 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 <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Customer Feedback Policy and procedure: Section 5.2.2.  5.2.2: A WCH Team Manager will carry out the initial investigations. We would then aim to resolve the complaint the same working day if a quick solution can be found. If not, we would look to resolve the issue within a maximum of ten working days, starting from the date the complaint was first logged. If the problem has been resolved within this timescale, we will agree with you that the complaint can be closed but if there are things outstanding e.g. repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale

<b>5.5</b>	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	Outstanding actions are managed and tracked through our Customer Feedback Module and Power BI Reporting.
<b>5.6</b>	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	This information is detailed within all complaint responses and we will reference policy, law and good practice where appropriate.
<b>5.8</b>	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"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	This information is included in all of our complaint responses.

## Stage 2

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.9</b>	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	Customer Feedback Policy and Procedure Section: 5.3.3:  You can ask for the issue to go to Appeal if: Our Initial Investigation has been concluded but you're unhappy with the outcome. In this case we would expect an Appeal to be requested within ten working days of the initial investigation being concluded; or <ul style="list-style-type: none"> <li>• Our initial investigation has not been concluded but more than ten working</li> </ul>

			<p>days (or a longer timescale we agreed with you) has passed and you're unhappy with progress.</p> <p>This is always adhered to should a stage two escalation be declined, the reasons are clearly mentioned and formally responded to along with outlining the right to contact the Housing Ombudsman, all of which is covered in our Customer Feedback Policy Section 5.3.2: We reserve the right not to accept an Appeal where: - • The appeal is not sufficiently detailed or clear; • No new evidence is being submitted beyond that already considered; • We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter; • We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit; • We consider that the complaint is vexatious or otherwise unreasonable; or • The customer has surpassed the ten day deadline and an additional ten day extension deadline where required (see 5.3.1 above).</p>
<p><b>5.10</b></p>	<p>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.</p>	<p>Yes</p>	<p>We follow the same practice as we do at stage one where customers are contacted to clarify the reason for the escalation.</p>

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	The customer must go through our Stage one process before the complaint can be escalated to stage two.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	<p>Customer Feedback Policy and procedure: Section 5.3.4:  A Stage 2Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH's discretion) together with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2 must be above the investigating manager at Stage 1.</p> <p>All complaint correspondences / information is recorded and retained with our Customer Feedback Module</p>
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Customer Feedback Policy and Procedure: Section 5.3.4:</p> <p>A Stage 2Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH's discretion) together with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2 must be above the investigating manager at Stage 1. It should take no more than fifteen working days from the date WCH are clear of the reasons for escalating the complaint, and in exceptional circumstances, no more than 20 days. If the issue is such that we cannot conclude the Appeal within this</p>

			timescale we will apologise, explain why this is the case and confirm a new expected response date.
<b>5.16</b>	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>and</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	These are key features in all templated complaint response letters which have been developed for each stage of the complaint.

### Stage 3

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.17</b>	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We adhere to a two-stage complaints process as set out in our Customer Feedback Policy and Procedure.
<b>5.20</b>	<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"> <li>• the complaint stage</li> </ul>	N/A	WCH do not have a third stage of our complaints process therefore, this is not applicable.

	<ul style="list-style-type: none"> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>		
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## Best practice 'should' requirements

### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary 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	<p>All complaints at stage one are concluded within 20 working days.</p> <p>Customer Feedback Policy and Procedure: Section 5.2.3: In some rare circumstances, we may need to extend a Stage 1 Complaint for a further ten days. This allows for the relevant manager to conclude their investigation into the complaint and issue a final response.</p> <p>If a complaint is extended a formal correspondence will be sent to the customer, detailing the reasons for the delay and a new timeframe will be given (Stage 1 Extension Letter)</p>

<b>5.3</b>	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	Housing Ombudsman's contact details are set out at all stages of our complaints process. See section 2.7 and 2.8.
<b>5.4</b>	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	We consider all relevant evidence to the customers complaint including historic reports should this be relevant to the complaint
<b>5.7</b>	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	If new concerns are raised after the stage one has been responded to, a new complaint will be raised. If the complaint has not been responded to, these concerns will be responded to at stage one.  All complaint correspondences / information is recorded and retained with our Customer Feedback Module

## Stage 2

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.14</b>	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	All complaints at stage two are concluded within 20 working days.  Customer Feedback Policy and Procedure: Section 5.3.4: A Stage 2 Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH's discretion) together



			<p>with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2 must be above the investigating manager at Stage 1. It should take no more than fifteen working days from the date WCH are clear of the reasons for escalating the complaint, and in exceptional circumstances, no more than 20 days. If the issue is such that we cannot conclude the Appeal within this timescale we will apologise, explain why this is the case and confirm a new expected response date.</p> <p>If a complaint is extended a formal correspondence will be sent to the customer, detailing the reasons for the delay and a new timeframe will be given (Stage 2 Extension Letter)</p>
<b>5.15</b>	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	Housing Ombudsman's contact details are set out at all stages of our complaints process. See section 2.7 and 2.8.

### Stage 3

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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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 <b>within 20 working days</b> 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	As mentioned, we do not have a third Stage as part of our complaints process therefore this is not applicable
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	This is not applicable as we do not have a third Stage as part of 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	If a service failure has been identified, this will be acknowledged within our detailed response. We will clearly state the failure, clear actions on how we will put things right along with any timescales and goodwill gestures. We will also state what we have learned from the service failure and recommend service change.
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	All complaints are investigated fairly and reasonably which will take into account any inconvenience caused to the customer. Any redress will be in line with our Goodwill Gesture Policy.

<b>6.5</b>	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 is covered in our Goodwill Gesture Policy, and we look at this on a case-by-case basis and tracked as an action in our system.
<b>6.6</b>	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 covered in our Goodwill Gesture Policy, and we look at this on a case-by-case basis and tracked as an action in our system

### Best practice 'should' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>6.3</b>	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	Relevant policy and processes are always considered and amended where required once a complaint outcome has been reached.  Lesson Learned is featured within our quarterly Customer Experience Highlight Report which is share with the Executive Management Team.
<b>6.7</b>	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	Legal advice is available to the team and is utilised as required usually in relation to breach of tenancy issues or insurance claim.

### Section 7 - Continuous learning and improvement

#### Mandatory 'must' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	We regularly meet with our Customer Experience Committee, Gateway Membership Team and update our annual report with any services changes made or learnings we have taken as a result of a complaint
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	<p>In 2022 WCH appointed a Chair of the Customer Experience Committee (CEC) who is a Board Member also.</p> <p>Group Board receive an annual report on complaints, Our Customer Experience Committee receives regular information on complaints and escalation to the Ombudsman including any outcomes and learning for the business.</p> <p>The Assistant Director of Customers and Communities and Customer Experience Manager meet with the Chair of the CEC quarterly to discuss complaint trends and patterns, Housing Ombudsman Cases and Determinations.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> </ul>	Yes	A quarterly Customer Experience Report is provided to the Executive Management Team setting out volumes, handling, themes and any open and resolved Ombudsman cases. An annual report outlining these trends is also shared on

	<ul style="list-style-type: none"> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>		<p>the website with our customers. The annual performance report is shared with the Customer Experience Committee and Gateway Membership Team. Our system ensures that we add follow on actions to any complaints that have ombudsman recommendations and that these can be tracked.</p>
<b>7.5</b>	<p>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.</p>	Yes	<p>A quarterly Customer Experience Highlight Report is shared with the Executive Management Team. This details: Number of complaint cases, Housing Ombudsman cases, cases at risk, Four teams with the highest number of grumbles and complaint and what they are doing to resolve service issues and complaint trends and patterns.</p>
<b>7.6</b>	<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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	<p>All employees were set a corporate objective: Complaint handling responsibilities for all employees:</p> <ul style="list-style-type: none"> <li>• To ensure you are collaborative and co-operative in your approach towards any complaints or dissatisfaction, working with relevant colleagues to create a resolution.</li> <li>• To ensure that any complaints or dissatisfaction mentioned is logged, collated and sent to Customer Relations to ensure good record keeping.</li> <li>• Where there may have been any shortfalls identified through complaints, ensure that ownership is taken and that learnings and actions are made to</li> </ul>

			improve the service and increase customer satisfaction.
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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
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	Customer Feedback Policy and Procedure: Section: 8.3. We complete an annual self-assessment against the HO Complaint Handling Code, to ensure that our complaint handling remains in line with the requirements set out in the Code.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	There have been no restructures or changes in procedure during the period since the last review.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	WCH publish the outcome of our self-assessment on our website: <a href="http://www.wcht.org.uk">www.wcht.org.uk</a> , this is also included on our annual report. The assessment is also shared with our Executive Management Team, Customer Experience Committee, Gateway Membership Team and relevant colleagues.