

# Housing Ombudsman Complaint Handling Code

Self-assessment 2022

# Housing Ombudsman Complaint Code Self-Assessment Form

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

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

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

## Section 1 - Definition of a complaint

### Mandatory must requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Y	Our complaints policy and procedure define a complaint using wording prescribed by the Housing Ombudsman Service.
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.	Y	This requirement is reflected in our complaints policy and procedure.  We meet this requirement by ensuring that all staff are trained appropriately. We also ensure the message is conveyed regularly via our staff intranet and targeted articles in our newsletters.
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.	Y	We meet this requirement within our complaints policy and procedure under point 17. We also ensure the message is conveyed regularly to staff who have direct interactions with customers.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Y	We welcome and actively seek feedback from our customers. If we do not feel a

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			complaint is valid, we communicate this to our customers explaining the reasons why and ensuring that they are aware they can approach the Housing Ombudsman Service who may instruct us otherwise.
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.	Y	We meet this requirement by detailing exceptions within our complaints policy and procedure under point 12.
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.	Y	Our policy and procedure set out what is outside of a complaint.  We meet the requirement to provide a detailed explanation by providing a template that staff must use to respond to a customer. The template includes a reference to the Housing Ombudsman Service.

### 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.	Y	We define a service request as a quick resolution issue which may be resolved within 48hrs. Should we fail to resolve the issue, it automatically converts to a complaint using the originating date the issue was raised to ensure it is not detrimental to the customer.  We have also published Lead Officer guidance reflecting changes to Complaints Handling.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Y	We survey our customers on a regular basis. We include text within the survey advising customers of how they can make a complaint if they are dissatisfied.

## 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.	Y	We provide our customers with several channels to make a complaint, which are detailed in our complaint policy and procedure under point 11.  When reviewing our policy and procedure we enlisted the support of our Customer Advocates to ensure we met this requirement.
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.	Y	Our complaints policy and procedure is available on our website, the location is referenced in our communication and we send hard copies on request. We also offer a translation service should this be required.
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.	Y	We meet this requirement as details of how to make a complaint are within two clicks of landing on our website.
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	Y	We meet this requirement within our complaint policy and procedure as referenced under point 10. When reviewing our policy and procedure to ensure compliance with the Complaint Handling

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	and that complaints handlers have had appropriate training to deal with such requests.		Code we also carried out an Equality Impact Assessment.
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.	Y	<p>We meet this requirement in several ways by:</p> <ul style="list-style-type: none"> <li>• Publishing our complaint policy and procedure on our website</li> <li>• Providing links to the Housing Ombudsman Service and Complaint Handling Code on our website</li> <li>• Including details within regular correspondence such as complaint letter templates</li> <li>• Providing leaflets/posters for our offices and schemes.</li> </ul>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Y	<p>We meet this requirement by including references and links within all complaint's communications.</p> <p>We provide links to selected Housing Ombudsman Service press releases on our website <a href="http://www.moat.co.uk">www.moat.co.uk</a></p>
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.	Y	We meet this requirement by including references and links within all complaint's communication.

## 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.	Y	We meet this requirement within our current policy and procedure under point 22 which states that enquiries via social media will be dealt with as a first request for service by the relevant part of the organisation. If necessary, they will then be entered into complaints process. We have also included guidance of how to ensure privacy of information.

## 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".	Y	We have a Complaints Taskforce which has oversight and coordination of all complaints. All teams have trained Lead Officers who are able to manage the complaint journey.  The Complaints Taskforce provides monthly reporting to the Executive Team and regular reporting to the Customer & Communities Committee and Board.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Y	All complaint Lead Officers receive appropriate training. The Complaints Taskforce reports directly into the Executive Team to ensure investigations are impartial.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <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>	Y	<p>We meet this requirement by ensuring that all staff are appropriately trained and enabled to provide appropriate resolutions in line with our complaints policy and procedure and compensation policy.</p> <p>Our vision and values are aligned to CIH professional standards.</p>

## Section 4 – Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Y	<p>For the period 1 April 2021 to 31 March 2022, we achieved 99.5% compliance for logging complaints within five days of receipt.</p> <p>We introduced an additional field on our CRM system which records the date received, in addition to the date the complaint was raised, to ensure an accurate target.</p> <p>Our timescales are detailed within our complaint policy and procedure under point 18.4 and are in compliance with HOS</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			Complaint Handling Code.
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.	Y	We have met this requirement by creating mandatory fields within our CRM module and providing guidance to staff in template letters they are required to use to ensure consistency in response and compliance with this requirement.
4.6	A complaint investigation must be conducted in an impartial manner.	Y	We issue this guidance in both our training and our complaints policy and procedure under our aims and objectives under point 6.2.
4.7	<p>The complaint handler must:</p> <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>	Y	We issue this guidance in both our training and our complaints policy and procedure under our aims and objectives under point 6.2.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Y	We issue this guidance in both our training and our complaints policy and procedure under our aims and objectives under point 6.2. We also ensure this is agreed with the customer by making the field mandatory on our CRM system.
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>	Y	We meet this requirement by ensuring that there is appropriate guidance in our complaints Lead Officer training.



Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Y	We meet this requirement within our complaints policy and procedure under point 18.4.
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.	Y	We meet this requirement within our complaints policy and procedure under point 18.8. In exceptional cases we reserve the right to waive a stage of the complaint process if we do not feel it would be beneficial and/or may frustrate the customer/resolution further. We would only do so having taken guidance from the Housing Ombudsman Service and would ensure that the Service is signposted to the customer.
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.	Y	We have developed a complaint module within our CRM system where all documentation and contact is stored and noted.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Y	We meet this requirement within our unacceptable behaviour policy which details both the policy and process.

### 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	Y	Our complaint lead officers are encouraged to manage a customer's expectations at the outset of a complaint.
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.	Y	We aim to resolve all issues as swiftly as possible.

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>4.5</b>	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.	Y	We meet this requirement within our complaint policy and procedure under section 10 on representation and support.
<b>4.8</b>	Where a key issue of a complaint related to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Y	Our complaint Lead Officers are instructed to manage a customer's expectations at the outset of a complaint, this includes ensuring complainants are aware of both their own and Moat's responsibilities and may include sign posting other relevant bodies or organisations, such as FTT.
<b>4.9</b>	Communication with the resident should not generally identify individual members of staff or contractors.	Y	We only refer to staff members and/or contractors when it is appropriate or relevant to do so. This is usually when a complaint relates to one of those parties.
<b>4.10</b>	Landlords should keep residents regularly updated about the progress of the investigation.	Y	We tell our complaint Lead Officers to agree a contact schedule which is captured and monitored within our CRM 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.	Y	We meet this requirement by regularly surveying closed complaints by email, text message and telephone.
<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.	Y	We have a dedicated page on our staff intranet for our customer voice where we share both the learning from our own complaints and cases published in relation to other Registered Providers. We also specifically featured complaints and the potential impact on service delivery at our 2022 all staff conference.
<b>4.19</b>	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.	Y	We meet this requirement within our unacceptable 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 <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.	N	We have adopted this response timescale as a KPI target. For the period 1 April 2021 to 31 March 2022, 46% of our responses were within this target timescale. To improve our performance, we are ensuring our expectations are clear with our contractors and encouraging our complaint Lead Officers to manage our customers’ expectations including timescales.
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	Y	We meet this requirement by utilising commitments which are agreed with the customer prior to closing a complaint. We use our CRM system to capture and monitor the commitments as part of our overall complaint management.
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.	Y	We meet this requirement by providing the relevant guidance to Lead Officers. We also have a stage one review, where a customer is able to highlight any issues which remain outstanding or have been overlooked prior to the closure of a complaint and without triggering escalation.
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"> <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> </ul>	Y	We meet this requirement by issuing guidance with our stage one response template which covers the points listed.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	details of how to escalate the matter to stage two if the resident is not satisfied with the answer		

## 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.	Y	We endeavour to resolve complaints fully to customers satisfaction using our two stage procedure. We only deviate from that procedure after having taken advice from the Housing Ombudsman Service.
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.	Y	We meet this requirement within our stage two acknowledgment template. This information can also be captured during the initial introductory communication and is used to populate the relevant fields in our CRM module.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Y	We meet this requirement within our policy and procedure under point 18. We reserve the right to use our discretion where individual circumstances merit it.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Y	We meet this requirement within our complaints policy and procedure under point 18.8.
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</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.	N	We have adopted this response timescale as a KPI target within our complaints policy and procedure. For the period 1 April 2021 to 31 March 2022, 48% of our responses were within this target timescale. We encourage our complaint lead officers to manage our customers' expectations

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			including timescales.
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"> <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 concerns</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>	Y	<p>We meet this requirement by providing guidance within our stage two response template which covers the points listed.</p> <p>We are also in the process of training staff to refine their written communication style to ensure that it is clear and customer friendly.</p>

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	-	N/A We follow a two stage procedure
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> </ul>	-	N/A WE follow a two stage procedure

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	<ul style="list-style-type: none"> <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> details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied		

## 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.	Y	<p>We meet this requirement by managing the customer expectations and explaining the reason for any delays.</p> <p>We also monitor compliance using an override function on the complaint's module with a restricted authorisation pool of staff. The module includes a tick box to confirm that this has been agreed with the customer.</p>
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.	Y	We meet this requirement by referencing the Housing Ombudsman Service in all complaints communication to ensure that customers are aware they can be contacted at any time during the complaint.
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.	Y	As part of any complaint review the complaint Lead Officers will use the information from the customer, the CRM system and any other information held to identify if there were earlier occurrences or related incidents.
5.7	Where residents raise additional complaints during the	Y	We meet this requirement by issuing and

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	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.		publishing the Complaint Handling Code to complaint Lead Officers, so they are aware of this requirement.

## 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 to landlord to respond to the complaint fully, this should be agreed by both parties.	Y	We meet this requirement by managing the customer expectations and explaining the reason for any delays.  We also monitor compliance using an override function on the complaint's module, which includes a tick box to confirm that the this has been agreed with the customer.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Y	We meet this requirement by referencing the Housing Ombudsman Service in all complaints communication to ensure that customers are aware they can be contacted at any time during the complaint.

## 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 <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a	-	N/A We follow a two stage procedure

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	date for when the stage three response will be received should be provided to the resident.		
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 follow a two stage procedure

## 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.	Y	We meet this requirement by providing complaint Lead Officers with guidance on dispute resolution and information within our templates for response.
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.	Y	Our complaint Lead Officers refer to our compensation policy and the Housing Ombudsman Remedies Guidance. We also utilise the Housing Ombudsman Service case library to identify cases for remedy comparisons.
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.	Y	We meet this requirement by providing complaint Lead Officers with guidance within our templates for response and utilising the commitments function within the complaint's module.
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.	Y	Our complaint Lead Officers refer to our compensation policy and the Housing Ombudsman Remedies Guidance. We also utilise the HOS case library to identify comparable cases for remedy comparisons.



### 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.	Y	We meet this requirement by creating a lessons field within the complaints module which is mandatory. Using this information, we can identify themes and trends and consider the best ways of preventing reoccurrences.
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.		We acknowledge this within our complaints policy and procedure under point 14.1 and commit to continuing to work with customers to reach a resolution during that period.

### 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.	Y	We share our learning and improvements in the following ways: <ul style="list-style-type: none"> <li>• Annual report</li> <li>• Publishing on our website</li> <li>• Executive, Committee and Board reporting</li> <li>• Customer Voice page on our intranet.</li> </ul>

#### 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	Y	Our Chief Executive, who is a member of Moat's governing body, has lead

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	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.		responsibility and fully supports a positive complaint handling culture.
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> <li>• The annual performance report published 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 implement 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>We regularly report to our Executive, Customer and Communities Committee and Board in both complaints' performance specific papers and our overall KPIs.</p> <p>All Housing Ombudsman determinations are shared with the Executive and Board either in full or summary format.</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.	Y	<p>We achieve this by using our Complaints Taskforce, Insight team and Complaints Oversight Group to identify themes and trends which are reported to the Executive, Customer and Communities Committee and Board.</p> <p>Our Complaints Oversight Group has a cross functional membership of senior members of staff. They assess trends from complaints and identify any changes needed to working practices.</p>
7.6	Landlords should have a standard objective in relation to	Y	All staff have an objective relating to

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	<p>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>		<p>complaint handling assigned for 2022/23.</p> <p>We have also launched new vision and values during 2022 which are anchored to the CIH professional standards and promotes a positive learning culture.</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.	Y	Annual self assessments are carried out against the Code and reported to the Board.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Y	In the event of a significant restructure or changes in process we will ensure the assessment is carried out and review the impact of the restructure or change.
8.3	<p>Following each self-assessment, a landlord must:</p> <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>	Y	<p>We will ensure the self assessment is shared with our Executive, Customer &amp; Communities Committee and Board.</p> <p>We will publish this document, or a link to it, in full on our website for our customers to view and provide hard copies on request.</p> <p>This annual self assessment will be included within our annual report in 2023.</p>

