

Self-Assessment Form (Appendix B of the Housing Ombudsman’s Code)

This self-assessment was completed by the Complaints Officer and approved at the Customer Committee meeting on 7 March 2023 on behalf of The Abbeyfield Society Board.

As detailed below, Abbeyfield is partly compliant with four mandatory recommendations and two best practice recommendations. For each recommendation, any planned actions to achieve compliance and associated dates are provided.

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	As per section 4.1. Definition of a Complaint in the Complaints, Concerns and Compliments policy (‘policy’).
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	As per section 4.1. Definition of a Complaint of the policy: <i>“Abbeyfield recognises that the word complaint does not have to be used in order for it to be treated as such. While this policy is aimed at residents or their representatives, the above definition is extended to cover an expression of dissatisfaction from any stakeholder affected by the standard of service, actions or lack of action from The Abbeyfield Society or those working for us.”</i>

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.	Partly	<p>As per section 4.1. Definition of a Complaint of the policy: <i>“A service request may precede a formal complaint if appropriate action is not taken to resolve the issue for residents as early as possible. A complaint will be raised when the resident raises dissatisfaction with the response to their service request.”</i></p> <p>Issues raised at the service are covered in the Addressing a Service-Level Complaint SOP.</p> <p>Formalise process between property/maintenance requests and a complaint (end of July 2023, Quality & Compliance Manager and Head of Property).</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>As per section 4.1. Definition of a Complaint of the policy: <i>“Aside from the Exclusions given under ‘Scope’, Abbeyfield will treat any ‘expression of dissatisfaction’ as a complaint under this policy to ensure the identified issue is investigated and responded to appropriately.</i></p>
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.	Yes	<p>As per section 3. Scope of policy.</p>
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	<p>As per section 3. Scope of policy: <i>“In rare circumstances, Abbeyfield reserves the right to deal with a complaint differently (outside the normal complaints handling process) if required. A full record of the reasons why the complaint should be addressed differently will be made and the complainant informed accordingly.”</i></p> <p>Clarification was added to the policy in March 2023 to confirm that the complainant would be advised of their right to take their complaint to the 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 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	As per section 4.1. Definition of a Complaint of the policy: <i>“A service request may precede a formal complaint if appropriate action is not taken to resolve the issue for residents as early as possible. A complaint will be raised when the resident raises dissatisfaction with the response to their service request.”</i>
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	<p>The annual Housing Resident Satisfaction Survey is anonymous – however, there is space for respondents to provide their name and the name of their service (<i>“The survey is anonymous so we will not be able to identify which service or resident the response is from. If you would like us to follow up on any specific aspects of your response, please let us know your name and the name of the service”</i>) and the Complaints process would then be offered, as appropriate.</p> <p>Where a respondent to the Complaints Handling Satisfaction Survey states they remain dissatisfied with the Stage 1 response, their complaint is escalated to Stage 2.</p>

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	As per section 4.4 Making a Complaint of policy. Routes are by email / website, telephone, fax, post, through a representative, or in person.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>The Making a Complaint Guide leaflet outlines the number of stages, what is involved at each stage and the timeframes for responding. The leaflet is available on our website and in hard copy at each service.</p> <p>As per Addressing a Complaint SOP (procedure) section 3.1 Ensuring access to the Complaints procedure: <i>“The Complaints Leaflet will be made available in large print, Braille, audio and in translated versions where the need is identified. In line with the Accessible Information Standard, each service is responsible for covering the cost of producing information in alternative formats for people who use the service when it is needed.”</i></p> <p>Our updated Accessible Information policy now clearly outlines Abbeyfield’s approach to the provision of accessible information, including</p>

			information related to complaints.
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	There is a page on our website here: https://www.abbeyfield.com/complaints-process/ .
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	As per section 4.5 Reasonable adjustments of the policy: <i>"If the individual has difficulty in making a complaint using one of the options listed above, Abbeyfield will make all reasonable adjustments necessary to enable them to raise their complaint. All complainants will be treated in line with our Equality, Diversity and Inclusion Policy."</i> All staff have undertaken Equality, Diversity and Inclusion training.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	The Making a Complaint Guide is available on our website and in hard copy at each service, alongside printed Complaints posters on noticeboards. A 'Your Feedback Matters' reminder was placed in the Winter 2022-23 Abbeyfield Voice (residents' newsletter) with details of how to submit feedback or complaints.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>A copy of our 'Making a Complaint' guide is given to all prospective residents, displayed prominently on noticeboards at our services, and a downloadable copy is available on the complaints section of the TAS website here.</p> <p>As per section 4.11 The Ombudsman Service of the policy: <i>"Details will be provided in the Complaints leaflet, and all communications with applicable complainants."</i></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.	Yes	<p>As well as including details in the Making a Complaint Guide leaflet, the Stage 1 response template letter notifies the complainant of their right to contact the Housing Ombudsman. The inclusion of these details is tracked by the Complaints Officer as a Complaints Handling KPI.</p> <p>We don't include the Ombudsman specifically in the acknowledgement letter but we provide the Making a Complaint guide instead.</p>

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	<p>Covered in section 4.4 Making a Complaint of policy: <i>"It is recognised that many residents and other stakeholders engage with Abbeyfield via our public social media channels, such as Facebook and Twitter. As the Digital Team manage these channels, they are not recommended as a means of making a complaint. However, in the event that a complaint is raised via a direct message on a social media platform, the Digital Team will provide a generic response and pass the complaint immediately onto the Quality Team to be addressed using the standard procedure. Where an expression of dissatisfaction is made publicly via these channels, confidentiality cannot be protected. In some cases, the feedback will need to be addressed as a 'concern' (see 4.19) as it will not be possible to provide responses to the individual via social media."</i></p>

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	As per section 4.15 Responsibilities: <i>"The central complaints process is administered through the Complaints Officer, who has delegated responsibility from the Director of Legal and Compliance. The Complaints Officer is the Quality & Compliance Manager."</i>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>As per section 4.15 Responsibilities: <i>"The Complaints Officer will direct all complaints received to the appropriate manager for investigation. Each manager is responsible for addressing complaints within their area of responsibility, unless there is a conflict of interest in which case another senior manager would investigate the issues raised."</i></p> <p>While Regional Operations Managers handle complaints for their services, we would reallocate complaints to alternative investigators where a conflict of interest is identified.</p>

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. 	Partly	Regional Operations Managers can act sensitively and fairly, have access to staff at all levels and have the authority and autonomy to resolve disputes. Abbeyfield undertakes values-based interview processes. Training on the new policy was undertaken by the Complaints Officer in late 2022 but a permanent training module on Complaints Handling within the LMS is required (April 2023, Learning & Development Team). In addition, all staff will receive Customer Service training in the future (April 2023, Learning & Development Team).

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 (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 .	Yes	<p>As per section 4.4 Making a Complaint of the policy: <i>"Where a resident, or their representative, is dissatisfied with any aspect of the service provided by Abbeyfield, the first course of action should be to raise the problem directly with the relevant manager or individual concerned. All staff members are expected to seek to resolve any issue causing dissatisfaction immediately. In many cases, the issue causing dissatisfaction will be resolved and no further action will be required... However, where the issue cannot be raised or resolved locally, or the local response is deemed unsatisfactory, a formal complaint can be made using the procedure below."</i></p> <p>This is detailed further in the Addressing a Service-Level Complaint SOP.</p> <p>As per section 4.10 Timescales of the policy <i>"Written acknowledgement within two working days of receipt of the complaint"</i>, which is monitored as a Complaints Handling KPI.</p>
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	Yes	<p>As per section 3.3.1 Acknowledgment of the procedure: <i>"The complaint acknowledgement will also set out the understanding of the complaint and the outcomes the complainant 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."</i></p> <p>This is included in Appendix 1 – Standard template acknowledgement letter.</p>

	agreed between both parties.		
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>As per 3.3.2 The Investigating Officer of the Addressing a Complaint SOP: <i>“Where the complaint relates to an Abbeyfield service, the Regional Operations Manager responsible for the service that the complaint relates to will be allocated as the ‘Investigating Officer’...Where it is unclear who should investigate, the relevant Director will be notified to appoint an appropriate candidate. In all cases, the allocated person will have enough seniority and experience to deal with the issues which are raised by the complaint, and will not be directly implicated in the issues concerned.”</i></p> <p>The Regional Operations Managers handle complaints for their services – however, we will reallocate complaints to alternative investigators where a conflict is identified or this is requested by the complainant.</p>
4.7	<p>The complaint handler must:</p> <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	<p>Section 3.3.3 Investigating a Complaint of the procedure outlines the expectations of the Investigating Officer.</p>

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We will communicate with complainants by telephone, email, post or by text (as per one complainant's request). Each complainant always receives a standard written letter for their Stage 1/2 response letters (either by email or by post), alongside any other method of communication requested.
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"> • set out their position • comment on any adverse findings before a final decision is made. 	Partly	<p>In section 3.3.3.4 Final response of the procedure: "<i>The Investigating Officer may also offer to meet or have a phone call with the complainant to discuss the outcome further, if they have not done so during the investigation period.</i>" However, this is not mandatory at Stage 1. There is no longer a standard opportunity for a complainant to comment on adverse findings before the Stage 1 response letter – this was removed in the update of the policy following feedback from the Operational teams due to the difficulties of meeting a complainant to discuss findings which are adverse prior to the provision of the letter. However, the complainant has an opportunity to set out their position and comment on adverse findings as part of an escalation to Stage 2. No further actions are planned.</p> <p>For complaints about a staff member, these would be referred to the HR Advice Team and an investigation carried out in line with the Disciplinary Policy, as per section 3.3.2 The Investigating Officer of the procedure: "<i>If the complaint relates to a staff member, the Investigating Officer should refer to the HR Advice Team to confirm whether the substance of the complaint could be deemed a disciplinary matter. If the complaint is of a disciplinary nature, the investigation must be carried out in line with the Abbeyfield Disciplinary Policy. The timescale for a response may need to be extended due to the need to instigate disciplinary proceedings and the complainant should be advised accordingly, while protecting the confidentiality of the staff member.</i>"</p>

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	As per section 4.9 of the Handling Complaints of the policy: <i>“Requests to escalate should be received within three months of the date of the previous response...In the event that an escalation is received after three months, a decision will be taken by the Director of Legal and Compliance.”</i>
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	As per section 4.9 of the Handling Complaints of the policy: <i>“Requests to escalate...will be subject to the same exclusions outlined under ‘Scope’.”</i> As per section 3. Scope of the policy: <i>“If there is doubt about how a matter should be addressed, the Director of Legal & Compliance will make the final decision.”</i>
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	As per section 4.9 Handling Complaints of the policy: <i>“All complaints received and subsequently investigated will be recorded fully in the Complaints Log and a copy of relevant documentation kept.”</i> As per section 3.3.3.4 Final response of the procedure: <i>“The Investigating Officer should provide a copy of correspondence with the complainant and any reports prepared to the Complaints Officer to file”</i> and section 3.4 Stage 2: Review of the complaint and subsequent investigation by a Director (<i>“The Reviewing Director should provide a copy of correspondence with the complainant, and further investigation notes or reports prepared to the Complaints Officer to file.”</i>)
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from	Yes	As per section 4.14 Managing complainants’ expectations and behaviour of policy <i>“If a complaint is accompanied by inappropriate behaviour (e.g. aggressive or abusive) from the complainant, Abbeyfield</i>

	residents and/or their representatives when pursuing a complaint.		<p><i>will seek to manage this behaviour separately...Actions to manage a complainant's behaviour may include warning the individual about their behaviour and requesting modifications, appointing a specific point of contact, or communicating only in writing. Any restrictions due to unacceptable behaviour will be agreed with the Director of Legal and Compliance, be proportionate and in line with the Equality Act 2010."</i></p> <p>This is detailed further in the Managing Unacceptable Complainant Behaviour SOP.</p>
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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	As per section 4.14 Managing complainants' expectations and behaviour of the policy: " <i>in the event that a complainant's desired outcome is unreasonable or unrealistic, Abbeyfield will seek to explain the reasoning to the individual at the outset.</i> "
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	As per section 4.9 Handling Complaints of the policy: " <i>Abbeyfield aims to resolve the complaint at the earliest stage possible.</i> "
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	Yes	As per section 4.4 Making a Complaint of the policy: " <i>We will co-operate with anyone formally authorised to act on behalf of a complainant. By formally authorised, this normally means the resident has provided their written consent.</i> "

	reasonable.		
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	Where a complaint relates to a specific legal obligation, the Legal team would be involved in the response to ensure we set out our understanding of the obligations in the response letter.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	As per 3.3.2 The Investigating Officer of the procedure: <i>"If the complaint relates to a staff member...The timescale for a response may need to be extended due to the need to instigate disciplinary proceedings and the complainant should be advised accordingly, while protecting the confidentiality of the staff member."</i> The Complaints Officer monitors responses to ensure staff, resident or contractor names are not used (if required, titles are used, e.g. Manager).
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	As per section 4.9 Handling Complaints of the policy: <i>"The complainant will be kept informed of any delays to the expected completion date of the investigation"</i> and <i>"Once the Stage 1 investigation has concluded, the findings will be communicated to the complainant, alongside any action taken and our proposals to resolve the complaint."</i>
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	As per section 4.9 Handling Complaints of the policy: <i>"Following the conclusion of the complaint, the complainant will be asked for feedback on their satisfaction with the complaints handling process."</i> A survey is sent three months after the final response.

			<p>The annual Housing Resident Satisfaction Survey has been updated for 2023 to comply with the Tenant Satisfaction Measures, including the following questions:</p> <ul style="list-style-type: none"> • <i>“Have you made a complaint to Abbeyfield in the last 12 months?”</i> • <i>“If Yes, how satisfied or dissatisfied are you with Abbeyfield’s approach to complaints handling?”</i> • <i>“If No, are you aware of how to make a complaint?”</i>
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	<p>For complaints about a staff member, these would be referred to the HR Advice Team and an investigation carried out in line with the Disciplinary Policy, as per section 3.3.2 The Investigating Officer of the procedure.</p> <p>There is an assumption of support for complaints which are about staff members – which was confirmed with Operational teams.</p>
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	<p>As per section 4.14 Managing complainants’ expectations and behaviour of the policy: <i>“Any restrictions due to unacceptable behaviour will be agreed with the Director of Legal and Compliance, be proportionate and in line with the Equality Act 2010.”</i></p> <p>This is detailed further in the Managing Unacceptable Complainant Behaviour SOP in section 3.1.2.1 Making reasonable adjustments of the procedure: <i>“Where there are issues with how a complainant is engaging with the complaints process, the first action will be for the Complaints Team to ask the individual to explain what adjustments they need to ensure they can access the complaints procedure.”</i></p>

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	As per section 4.10 Timescales of the policy: <i>"Stage 1 decision - a full written response will be provided within 10 working days of the acknowledgement. If this is not possible, Abbeyfield will contact the complainant, explain why, and agree a new response time, which will only exceed a further 10 days by exception."</i> Compliance with the ten working day timescale and any extensions are monitored via Complaint Handling KPIs.
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	As per section 3.6 Putting things right of the procedure: <i>"Where the investigation (Stage 1) or the subsequent review (Stage 2) identifies that a complaint should be upheld, the Investigating Officer or Reviewing Director should...Ensure the required actions are taken through to completion."</i> The Complaints Officer monitors extensions and would not accept a delay as a result of waiting for outstanding actions (e.g. a repair) to be completed.
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	As per section 3.3.3.2 Reviewing the evidence of the procedure: <i>"Once collated, the evidence should be reviewed against:</i> <ul style="list-style-type: none"> • <i>TAS policies and procedures</i> • <i>Relevant legislation and regulations, where applicable</i> • <i>Resident information and literature"</i> Section 3.3.3.4 Final response of the procedure states: <i>"The final</i>

			<p><i>response letter should include: details of the findings...</i></p> <p>The Stage 1 template response letter has a section for the findings to be detailed via bullet points.</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <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	<p>As per section 3.3.3.4 Final response of the procedure: <i>“The final response letter should include:</i></p> <ul style="list-style-type: none"> • <i>details of the findings;</i> • <i>any action that has been taken;</i> • <i>our proposals to resolve the complaint (see ‘Putting things right’); and</i> • <i>details of how to escalate the complaint if the complainant remains dissatisfied</i> • <i>the contact details for the Ombudsman, if relevant for the complainant.”</i>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	<p>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</p>	Yes	<p>As per section 4.9 of the Handling Complaints of the policy: <i>“Complainants are not required to put their request to escalate their complaint to the next stage of the process in writing but will need to inform Abbeyfield if they remain dissatisfied...Requests to escalate...will be subject to the same exclusions outlined under ‘Scope.’”</i></p>

	its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.		
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	<p>As per section 3.4 Stage 2: Review of the complaint and subsequent investigation by a Director of the procedure: “<i>The Complaints Officer will send the standard written acknowledgement of escalation letter (Appendix 9) to the complainant(s) within five working days of receipt of the request.</i>”</p> <p>The standard acknowledgement of escalation letter (Appendix 9) states: “<i>We understand that your outstanding dissatisfaction relates to < details to be added, e.g. the Stage 1 response failing to provide adequate compensation for the delay in undertaking repairs to your bathroom. > We understand that you would like < e.g. further compensation and an apology in recognition of the manner in which the situation has been handled >. If the above is not an accurate summary of the reason for the request to escalate your complaint, please let us know via complaints@abbeyfield.com or by using the contact details provided below.</i>”</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	<p>As per section 3.4 Stage 2: Review of the complaint and subsequent investigation by a Director of the procedure: “<i>If the complainant thinks that the initial response has not fully addressed their complaint or they remain dissatisfied, they may escalate the complaint to Stage 2 by contacting the Complaints Officer (by any means) and requesting a review.</i>”</p> <p>The Complaints Officer will notify a complainant if their request to escalate is received prior to the Stage 1 response.</p>

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	As per section 4.9 of the Handling Complaints of the policy: <i>“The person considering the complaint at Stage 2 will not be the same person that considered the complaint at Stage 1.”</i> This is monitored by the Complaints Officer.
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	As per section 4.10 of the Timescales of the policy: <i>“Stage 2 decision – a full written response will be provided within 15 working days from the request to escalate. If this is not possible, Abbeyfield will contact the complainant, explain why, and agree a new response time, which will only exceed a further 10 days by exception.”</i>
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • 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 and <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 	Yes	As per section 3.4 Stage 2: Review of the complaint and subsequent investigation by a Director of the procedure: <i>“The response letter must include:</i> <ul style="list-style-type: none"> • <i>the outcome of the review;</i> • <i>any further action that has or will be taken, if appropriate (see ‘Putting things right’);</i> • <i>confirmation that the internal complaints procedure has now concluded;</i> • <i>details of how to escalate the complaint if the complainant remains dissatisfied – by contacting the relevant Ombudsman and requesting a review, if appropriate.”</i>

	of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.		
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Yes	As per section 4.9 Handling Complaints of the policy: <i>“In line with the Housing Ombudsman’s Complaint Handling Code, there are two stages to our internal complaints process.”</i> This applies from October 2022 onwards.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> - the complaint stage - the complaint definition - the decision on the complaint - the reasons for any decisions made - the details of any remedy offered to put things right - details of any outstanding actions - details of how to escalate the 	N/A	

	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	As per section 3.3.3 Investigating a Complaint of the procedure: <i>"In the event that more than 10 working days is required, the Investigating Officer should contact the complainant and seek their agreement on the new timescale, prior to confirming in writing (Appendix 7)."</i>
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	This is not outlined in our policy but it would be advised by the Complaints Officer if the scenario arose.
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 Stage 1 investigation, the Regional Operations Manager would review the Service-level Complaints logs to see if the issue had arisen previously at the service, and also liaise with relevant teams (e.g. Property) to identify if it was a recurring issue.

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	As per section 3.3.3.3 Additional complaints of the procedure: <i>“Where residents raise additional complaints during the investigation either to the Complaints team or directly to the Investigating Officer (or other staff member), these will be incorporated into the Stage 1 response if they are relevant and the Stage 1 response has not been issued. Where the Stage 1 response has been issued, or it would unreasonably delay the response, the new issues will be logged as a new complaint and the complainant informed.”</i>
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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	As per section 3.4 Stage 2: Review of the complaint and subsequent investigation by a Director of the procedure: <i>“In the event that more than 10 working days is required, the Reviewing Director should contact the complainant and seek their agreement for the delayed timescale, which should then be confirmed in writing (Appendix 7). The new timescale and the reason for the delay should be communicated to the Complaints Officer.”</i>
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	This is not outlined in our policy but it would be advised by the Complaints Officer in this scenario.

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	
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	

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	As per section 3.6 Putting things right of the procedure: " <i>Where the investigation (Stage 1) or the subsequent review (Stage 2) identifies that a complaint should be upheld, the Investigating Officer or Reviewing Director should: Ensure the failure is acknowledged... Clearly outline the actions that Abbeyfield has or intends to take to put things right to the complainant.</i> "
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	As per section 3.6 Putting things right of the procedure: " <i>The specific actions that may be taken include:</i> <ul style="list-style-type: none"> • <i>Providing an apology to the complainant,</i> • <i>Providing information or an explanation to the complainant.</i> • <i>Reviewing resident literature (leaflets, posters etc.)</i> • <i>Reviewing an operational process.</i> • <i>Reviewing a contractual agreement with a third party supplier.</i> • <i>Requesting a review of a policy.</i> • <i>Arranging training or guidance for staff members involved.</i>" <p>Section 3.3.3 Investigating a Complaint of the procedure states: "<i>the Investigating Officer should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.</i>"</p>
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	As per section 3.6 Putting things right of the procedure: " <i>Where the investigation (Stage 1) or the subsequent review (Stage 2) identifies that a complaint should be upheld, the Investigating Officer or Reviewing Director should... Clearly outline the actions that Abbeyfield has or intends to take to put things right to the complainant; Ensure the required actions are taken through to completion.</i> "

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	As per section 4.13 Putting things right of the policy: “Where a complaint identifies that Abbeyfield has failed to deliver a service to the expected standard, we will seek to resolve the complaint and to ‘put things right’. The redress offered will reflect the extent of any failure in the service provided and the subsequent impact on the complainant as a result. Where fault is identified, Abbeyfield will apologise and take corrective action, including, where appropriate, making a compensation payment.”
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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	A new cross-organisational lessons learnt process has recently been implemented which will support a review beyond the circumstances of the individual complaint where the procedure is followed.
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	The in-house Legal team will advise if a resident has a legal entitlement to redress, or will take external advice when required.

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.	Partly	<p>As per section 4.16 Continuous learning and improvement of the policy: <i>“Where a complaint investigation uncovers significant findings, Abbeyfield will undertake a review in line with our Learning Lessons Policy (LG045P). The findings of lessons learnt exercises from complaints will be shared with the Operational Executive Committee and the Board, via the Quality Committee.</i></p> <p><i>Regular reports on the volume, category and outcome of complaints, as well as complainant satisfaction and compliance with set timeframes, will be provided to the Executive Committee and the Board, via the Quality Committee... On an annual basis, the Quality Team will review the organisation’s complaints handling procedures, and publish the results of the self-assessment to the Quality Committee, circulate to houses for display on noticeboards and place on Abbeyfield’s website. Data related to complaints will also be published in the organisation’s Annual Report.”</i></p> <p>Data from complaints has not yet been included in Abbeyfield’s Annual Reports but this will be addressed for the 2022/23 Annual Report (July 2023, Director of Finance and Director of Legal & Compliance).</p>

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>As per section 4.16 Continuous learning and improvement of the policy: <i>"The Chair of the Quality Committee, who has lead responsibility for complaints, will decide what data is required by the Quality Committee to provide insight on Abbeyfield's complaint handling performance."</i></p> <p>Discussions have been held with the Chair, the CEO, the Director of Legal & Compliance and the Complaints Officer to refine what this new role should entail.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable. • Individual complaint outcomes where necessary, including where the Ombudsman made 	Yes	<p>As per section 4.16 Continuous learning and improvement of the policy:</p> <p><i>"Where a complaint investigation uncovers significant findings, Abbeyfield will undertake a review in line with our Learning Lessons Policy (LG045P). The findings of lessons learnt exercises from complaints will be shared with the Operational Executive Committee and the Board, via the Quality Committee."</i></p> <p><i>Regular reports on the volume, category and outcome of complaints, as well as complainant satisfaction and compliance with set timeframes, will be provided to the Executive Committee and the Board, via the Quality Committee... On an annual basis, the Quality Team will review the organisation's complaints handling procedures, and publish the results of the self-assessment to the Quality Committee, circulate to houses for display on noticeboards and place on Abbeyfield's website. Data related to complaints will also be published in the organisation's Annual Report."</i></p>

	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.		
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	As per section 4.16 Continuous learning and improvement of the policy: “Where a complaint investigation uncovers significant findings, Abbeyfield will undertake a review in line with our Learning Lessons Policy (LG045P). The findings of lessons learnt exercises from complaints will be shared with the Operational Executive Committee and the Board, via the Quality Committee.” The Complaints Officer is the Quality & Compliance Manager and she undertakes this review.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <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 	Partly	The Abbeyfield Behaviours, which all staff are expected to model, include ‘We collaborate’ and ‘We take responsibility’. Within the Abbeyfield Leadership Charter, there are examples of how leaders should work to improve customer service and experience. Individual role profiles, particularly for Managers and Leaders within the organisation, have reference to specific competencies in relation to customer service and complaints where relevant. There is also a new draft Abbeyfield Code of Conduct, which further details the relevant behaviours which drive the customer experience. Once approved and issued, this item will be fully met (April 2023, HR Director and Head of Learning & Development).

	<p>than blaming others</p> <ul style="list-style-type: none">• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.		
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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	Completed annually in January and presented to Customer Committee at the first meeting of the year (normally January) before being published on website (www.abbeyfield.com/complaints-process). Due to rescheduling of Customer Committee meeting, it was delayed to March 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The self-assessment was taken into account during the review of the Complaints policy in late 2022 to ensure compliance and was undertaken in January 2023.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. 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 	Partly	<p>As per section 4.16 Continuous learning and improvement of the policy:</p> <p><i>“On an annual basis, the Quality Team will review the organisation’s complaints handling procedures, and publish the results of the self-assessment to the Quality Committee, circulate to houses for display on noticeboards and place on Abbeyfield’s website. Data related to complaints will also be published in the organisation’s Annual Report.”</i></p> <p>Data from complaints has not yet been included in Abbeyfield’s Annual Reports but this will be addressed for the 2022/23 Annual Report (July 2023, Director of Finance and Director of Legal & Compliance).</p>