

# Housing Ombudsman Complaint Handling Code: Self-assessment form

Compliance with the Complaint Handling Code			Evidence/Improvements to be made
<b>1</b>	<b>Definition of a complaint</b>	Yes	No
	<p>Does the complaints process use the following definition of a complaint?</p> <p><i>An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i></p>		No
	Does the policy have exclusions where a complaint will not be considered?	Yes	
	<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon</p>	Yes	
<b>2</b>	<b>Accessibility</b>		
	Are multiple accessibility routes available for residents to make a complaint?	Yes	
			<p>Our definition is similar but we will adapt the definition.</p> <p><b>Action:</b> We will bring the revised policy and procedure to the March 2020 Services Committee and implement changes from 01 April 2020 (using the term 'clients' in place of residents as we also provide non-accommodation based services). <b>Deadline:</b> March 2021 <b>Responsibility:</b> Deputy Executive Director of Strategy and Policy</p> <p>We have compared our exclusions as set out in our procedure and found that they are in line with the code.</p> <p><b>Action:</b> We plan to make one small amendment, to mention complaints about ongoing issues and how the deadline will affect those. <b>Deadline:</b> March 2021 <b>Responsibility:</b> Deputy Executive Director of Strategy and Policy</p> <p>Complaints can be made via support workers, service managers, our complaints phone line, <a href="mailto:complaints@mungos.org">complaints@mungos.org</a> or the <a href="#">complaints form on</a></p>

				<a href="#">website.</a>
	Is the complaints policy and procedure available online?	Y		Complaints overview leaflet on our website <a href="https://www.mungos.org/app/uploads/2020/10/A02S3-Complaints-overview-leaflet.pdf">https://www.mungos.org/app/uploads/2020/10/A02S3-Complaints-overview-leaflet.pdf</a>
	Do we have a reasonable adjustments policy?		N	<b>Action:</b> We have a section on diversity implications in our policy and procedure which we will review and update as needed. <b>Deadline:</b> March 2021 <b>Responsibility:</b> Deputy Executive Director of Strategy and Policy
	Do we regularly advise residents about our complaints process?	Y		The procedure requires all teams to promote the complaints via welcome packs, service inductions, complaints leaflets, posters and forms and a complaints box, client meetings, etc. Compliance with this policy and procedure is tested via our quality audit programme.
<b>3</b>	<b>Complaints team and process</b>			
	Is there a complaint officer or equivalent in post?	Y		We have a Quality and Continuous Improvement Officer who manages our central complaints service.
	Does the complaint officer have autonomy to resolve complaints?		N/A	This is not their role. Service managers are expected to investigate and resolve complaints.
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	Y		They can compel engagement with support from more senior managers from the Quality team and the Services Directorate. There are also clear expectations around complaints management for managers and staff included in our Competencies, Personal Excellence Standards, Service Excellence Standards and Solid Foundations compliance monitoring programme.
	If there is a third stage to the complaints procedure are residents involved in the decision making?		N/A	We only have a two stage procedure, as recommended.
	Is any third stage optional for residents?		N/A	
	Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	Y		
	Do we keep a record of complaint correspondence including correspondence from the resident?	Y		The procedure requires teams to keep records of all complaints including informal complaints. All complaints and responses are logged on our monitoring system,

				Opal. All email correspondence is retained, and searchable on Mimecast. The Quality team have a filing and archiving system for the complaints emails they send and receive.
	At what stage are most complaints resolved?			Most complaints are resolved at Stage 1. For example, in 2019/20, only 10 of the 455 Stage 1 complaints were appealed (with complainants asking to progress to Stage 2 of the complaints process).
<b>4</b>	<b>Communication</b>			
	Are residents kept informed and updated during the complaints process?	Y		All complaints should be acknowledged within two working days. Updates can be provided on request. We advise that the investigating manager speaks to the complainant in the first instance before beginning the investigation.
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	Y		We advise the investigating manager to speak to the complainant before beginning the investigation. It is also quite common for an investigating manager to both provide clients with a written response and discuss it with them to support understanding. Any areas of dispute can be explored then. If a complainant disagrees and provides further information we will re-open the investigation. All complainants are informed of how they can appeal the complaints decision.
	Are all complaints acknowledged and logged within five days?	Y		The procedure requires acknowledgement within two working days for stage 1 complaints. Informal complaints are required to be responded to within five working days.
	Are residents advised of how to escalate at the end of each stage?	Y		Template letters are available to guide managers in how to respond. The template stage 1 response letter includes a paragraph explaining how to appeal the response.
	What proportion of complaints are resolved at stage one?			94%
	What proportion of complaints are resolved at stage two?			100%
	What proportion of complaint responses are sent within Code timescales?		N/A	This is not relevant as our timescales are currently different (Stage 1 is 15 working days whereas the Code

	<ul style="list-style-type: none"> <li>• Stage one Stage one (with extension)</li> <li>• Stage two Stage two (with extension)</li> </ul>			<p>requires responses within 10 working days and Stage 2 is 30 working days whereas the Code requires responses within 20 working days).</p> <p><b>Action:</b> We will update timescales in line with the code for the March 2020 Service Committee.</p> <p><b>Deadline:</b> March 2021</p> <p><b>Responsibility:</b> Deputy Executive Director of Strategy and Policy</p>
	Where timescales have been extended did we have good reason?	Y		We have a section on the complaints record for explaining any delays which is mandatory – we can use this to ensure reasons given are appropriate. We also have a compliance monitoring programme ‘Solid Foundations’ to ensure timescales are met.
	Where timescales have been extended did we keep the resident informed?	Y		This is required in the policy and procedure.
	What proportion of complaints do we resolve to residents’ satisfaction			In our 2018 clients survey we asked, of those clients who made a complaint, how satisfied they were with the response. 73% said they were satisfied with the response.
<b>5</b>	<b>Cooperation with Housing Ombudsman Service</b>			
	Were all requests for evidence responded to within 15 days?	Y		<p>We have received three complaints investigations from the Ombudsman since 2017 to date but have noted we have not keep a consistent record of response times.</p> <p><b>Action:</b> Monitor complaints to the Ombudsman to ensure the timescale is met.</p> <p><b>Deadline:</b> 01 Oct 2020 and ongoing</p> <p><b>Responsibility:</b> Quality Manager.</p>
	Where the timescale was extended did we keep the Ombudsman informed?	Y		
<b>6</b>	<b>Fairness in complaint handling</b>			
	Are residents able to complain via a representative throughout?	Y		This is clearly set out in our policy and procedure. However, we take GDPR very seriously and first ensure a client has freely given consent for somebody to speak on their behalf.

	If advice was given, was this accurate and easy to understand?	Y		The Quality team provide support to managers on request, to ensure responses are clear and easy to understand. As detailed above, service managers will often discuss written complaints responses with clients to aid understanding.
	How many cases did we refuse to escalate?  What was the reason for the refusal?			We refused to escalate 8 of the 10 Stage 2 complaints requests and also the only Stage 3 complaints request in 2019/20. Complainants are always advised of their right to progress their complaint to the Housing Ombudsman at that stage.  If the complaint fails the following test which is set out in our policy and procedure, it will not go to stage two: <i>A complaint will proceed to stage two, as the result of an appeal, if:</i> <ul style="list-style-type: none"> <li>• <i>The investigation failed to consider all the reasonably available evidence; or</i></li> <li>• <i>The response was not consistent with the reasonably available evidence.</i></li> </ul>
	Did we explain our decision to the resident?	Y		We always clearly explain the test we carry out and why it has not been met.
<b>7</b>	<b>Outcomes and remedies</b>			
	Where something has gone wrong are we taking appropriate steps to put things right?	Y		We will explain this to the complainant and it is included in our standard complaints template:  <i>As a result of your complaint, the following changes will be made.</i>  <i>1. [State any changes you are going to make to the service or any wider organisational changes which have come about as a result of the complaint.]</i>
<b>8</b>	<b>Continuous learning and improvement</b>			
	What improvements have we made as a result of learning from			A wide range of varied improvements are made as a

	complaints?		result of complaints. These are recorded as 'Learning Points' on our system so can be collated for organisational learning.
	<p>How do we share these lessons with:</p> <ul style="list-style-type: none"> <li>a) residents?</li> <li>b) the board/governing body?</li> <li>c) In the Annual Report?</li> </ul>	Y	<ul style="list-style-type: none"> <li>a) We share these lessons with residents via the complaints response for individual complaints (as detailed above it is part of the standard template). Where it is an issue which affects more than one client, complainants may be informed via letters put under their doors, door to door updates, client meetings and 'You said, We did' posters. We also publish an annual Report to Residents which includes information about how we manage complaints.</li> <li>b) We have an annual complaints reports which goes to the Service Committee. For the first time in October 2020 we are producing a thematic analysis of learning points from complaints which will go to the Services Committee. The Service Committee are also notified of any complaints which are heard by the Ombudsman. Furthermore, we inform the Board of complaints numbers and response times on a quarterly basis. We have a former client on the Services Committee and the Client Advisory Board can view Board and Service Committee papers.</li> <li>c) We publish complaints information in our annual Financial Statements and Report to Residents which are available on our website. We do not currently include information in our Annual Report.</li> </ul> <p><b>Action:</b> We will be introducing quarterly Complaints Briefings for teams to discuss which highlight key lessons learnt from complaints. The purpose of these briefings is</p>

				to ensure learning and service improvements are shared across the organisation. <b>Deadline:</b> March 2021 <b>Responsibility:</b> Head of Quality and Information Security
	Has the Code made a difference to how we respond to complaints?	Y		
	What changes have we made?			All changes are listed above under 'Actions'.