

Outcome of Self-Assessment Details

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 1 - Definition of complaints				
1.2	Must	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	YES	We have adopted this definition of a complaint in our complaints policy which has been approved. It is available on the intranet and our customer website. Evidence: <ul style="list-style-type: none"> Complaints Policy
1.3	Must	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	Residents do not have to use the word complaint for us to log a formal complaint. We can evidence through a review of complaints received and logged that customers do not need to use the word complaint for a formal complaint to be raised. We process complaints received from third parties in line with our complaints policy. Evidence: <ul style="list-style-type: none"> Complaints Policy - 1.3 Review of sample complaints received in 2023, including through the independent review carried out by Altair.
1.6	Must	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	YES	Where a customer contacts us to chase up an initial service request, and this can be resolved quickly without the need for a complaint we will do this. Our complaints policy sets out that if we are unable to resolve this to the resident's satisfaction, or they request, then a formal complaint should be logged. Evidence: <ul style="list-style-type: none"> Complaints Policy Customer Contact Procedure
1.7	Must	A landlord must accept a complaint unless there is a valid reason not to do so.	YES	We outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code Evidence: <ul style="list-style-type: none"> Complaints Policy

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
1.8	Must	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>We outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code. These circumstances have also been reviewed with our Complaints Community of Interest to ensure they remain fair and reasonable.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy
1.9	Must	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>Where we do not accept complaints, we provide residents explanations regarding the reasons for this. Our Complaints Policy also outlines that we provide clear written rationale to residents for the reason to not accept a complaint.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy
1.4	Should	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	<p>Our complaints policy outlines that initial service requests should be dealt with as Customer Contact and there is a Customer Contact Procedure in place. Complaints training is provided which outlines the difference between a complaint and a service request.</p>
1.5	Should	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>Where we collate customer satisfaction survey information, customers who flag dissatisfaction are routed to operational teams who can make a judgement on the next steps, including contacting the customer to discuss any issues further. This is built into the contract for our external satisfaction surveys, and internal tools are set up to deliver this.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Customer Satisfaction feedback loop • IFF Research requirements

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 2 - Accessibility and awareness				
2.1	Must	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	The complaints policy outlines that complaints are accepted in any format, including written, verbal and digitally. The customer website routes online complaint forms to the Complaints team, and complaints are also logged and received through all other routes. Evidence: <ul style="list-style-type: none"> • Review of source of complaints received in 2023. • Complaints Policy
2.3	Must	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages <i>involved</i> , what will happen at each stage and the timeframes for responding.	YES	The complaints policy is available on the Sanctuary website in the Complaints section. The policy includes the relevant information needed. The customer website has been built to high accessibility standards and the website has been accredited by the Plain English society. Where a copy of the policy is requested, this can be provided to residents, and we have tools and frameworks in place to adapt to customer communication preferences Evidence: <ul style="list-style-type: none"> • Accessible Information Standard Policy • Complaints Policy • Sanctuary Website - Complaints section
2.4	Must	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	YES	The Sanctuary website has a complaints section that is easily accessible and is the most common route for customers to submit complaints. Evidence <ul style="list-style-type: none"> • Sanctuary Website - Complaints section
2.5	Must	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	The Complaints Policy contains reference to the commitment to make reasonable adjustments when handling complaints. The Customer Relations Team undertake Equality and Diversity training in line with the Sanctuary training framework. Evidence: <ul style="list-style-type: none"> • Complaints Policy • Equality and Diversity e-learning • Complaints Guidance - Reasonable Adjustments

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
2.6	Must	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	<p>Sanctuary's complaints policy is included and referenced across a range of different customer communications, including specific large-scale communications.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Website • Complaints Leaflets
2.7	Must	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	YES	<p>The Housing Ombudsman's contact information is publicised on the Sanctuary website and is included in all regular complaint correspondence including acknowledgments and responses.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Sanctuary website – Complaints section • Complaint acknowledgement and response letters
2.8	Must	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>The Housing Ombudsman's contact information is publicised on the Sanctuary website and is included in all regular complaints correspondence including acknowledgments and responses.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Sanctuary website - Complaints section • Complaint acknowledgement and response letters
2.2	Should	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>Social Media contact is managed within the Customer Service Centre where staff are trained and aware of complaint policies.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Customer Contact Procedure • Complaints Policy • Complaints Procedure

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 3 - Complaint Handling personnel				
3.1	Must	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	<p>Customer Relations Team have overall responsibility for complaint management and would be those generally identified as 'Complaint Handlers'. Specific staff across Housing and Supported Living also support in complaint handling and would play the complaint handling role. This is outlined in the Complaints Procedure.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Role profiles • Complaints procedure
3.2	Must	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	YES	<p>The Customer Relations Team is an independent team with a specific remit and skill set around complaint handling. The role profile outlines this skill set clearly.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints procedure • Role profiles
3.3	Should	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly; • be trained to handle complaints and deal with distressed and upset residents; • have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	YES	<p>The Customer Relations Team have access to staff at all levels with escalation processes in place to Director level. The team have undergone inclusion and diversity training and work within the organisations behaviour framework which include 'Integrity' behaviours linked to our values.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Escalation processes • Role profile • 121s • Complaint quality reviews

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 4 – Complaint handling principles				
4.1	Must	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>Sanctuary does not have an extra Stage 0 complaint stage. Where complaints are received, these are logged and resolved as a formal complaint.</p> <p>The complaints policy and system set out that complaints need to be acknowledged and logged within 3 working days and all complaints received are triaged by a specific and targeted team.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints Procedure • Complaint system timescales and complaint tracking
4.2	Must	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	YES	<p>This forms part of the standard acknowledgement format and ensures that the scope of the complaint is set out and agreed with the resident. Each acknowledgement allows the resident the opportunity to clarify any confusion, and where possible a telephone call is targeted as set out in procedure.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints Procedure • Complaint quality reviews • Review of sample acknowledgement letters
4.6	Must	A complaint investigation must be conducted in an impartial manner.	YES	<p>As per 3.2, complaints are handled by a team that is independent of service delivery. Where a complaint is about an individual staff member, they would not be involved in the investigation. All stage 2 complaints are investigated by the Customer Relations Team who sit outside of service delivery.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Role profiles • Complaints procedure

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
4.7	Must	<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>We have set out our approach to complaint handling in our Complaint Policy that meet the Housing Ombudsman requirements. This is monitored and validated through day-to-day management of the Customer Relations Team and review of cases.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complains Policy
4.11	Must	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	YES	<p>Complaint handlers seek to agree a communications plan with residents and the Complaints procedure sets out a five-day target for communicating and updating customers about complaints.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints Procedure • Review of customer communication within complaints - case quality reviews
4.12	Must	<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 and comment on any adverse findings before a final decision is made. 	YES	<p>We can evidence how we provide both residents and staff the opportunities to outline views and evidence as part of a complaint investigation. HR will also support investigations where appropriate. Customers have 10 working days to respond to any initial finding before a complaint is closed. At Stage 2, where customers raise any concerns or additional information, we conduct a review of all information provided before providing a final response.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint case reviews • Complaint procedure
4.13	Must	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	YES	This is included within the Complaints Policy. Performance against timescales is report to Executive Committee, Group Housing Board and Group Board.

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
4.14	Must	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	YES	Sanctuary do not refuse complaint escalations through the process unless by exception. Where this is the case, if there is a legitimate reason in line with the Ombudsman Code and Complaints Policy, this will be explained in writing to the resident. Evidence: <ul style="list-style-type: none"> • Complaints Policy
4.15	Must	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	YES	All complaints are logged on SAP with supporting records, correspondence and evidence saved onto the S:Drive. Evidence: <ul style="list-style-type: none"> • SAP complaint records • S:Drive • Complaint case quality reviews • Complaint Timeline
4.18	Must	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	YES	We have reference to unacceptable behaviour in the Complaints Policy and this is managed through the Customer Contact Procedure. We are able to evidence the fair and reasonable use of this. Although it is used as a last resort. Where customer contact restrictions may be put in place, there is an internal review process to Operations Director to ensure this remains independent. Evidence: <ul style="list-style-type: none"> • Complaints Policy • Customer Contact Procedure • Complaint case quality reviews • Managing challenging and unacceptable behaviour policy • Managing and challenging unacceptable behaviour procedure
4.3	Should	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	YES	Resident expectations are managed as part of the complaint handling process. Complaint handlers are expected to call residents to discuss complaints and expected outcomes with the resident. Evidence: <ul style="list-style-type: none"> • Complaints procedure

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
4.4	Should	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	<p>We aim to provide a response to all complaints within 10 working days at Stage 1 and 20 working days at Stage 2. This is only extended where necessary to support quality of investigation and is done so in discussion with the resident.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints policy • Complaints procedure • Complaints performance information
4.5	Should	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	YES	<p>The complaints process supports residents to have complaints managed by an advocate. We have third party authorisation processes in place and can evidence where this is done.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints policy • Complaints procedure • Customer Contact Procedure • Third Party Authorisation
4.8	Should	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	<p>We clearly outline any legal responsibilities and rationale for complaint decisions when responding to residents. Where required, the complaints team work closely with the legal team to validate responses for accuracy.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint response reviews • Complaints procedure
4.9	Should	Communication with the resident should not generally identify individual members of staff or contractors	YES	<p>Generally, we do not use individual names of members of staff, however where a customer has referenced this or specifically complains about the conduct of a named member of staff, we will reference this in our response. This is included in our complaint procedure.</p>

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
4.10	Should	Landlords should keep residents regularly updated about the progress of the investigation.	YES	<p>Our complaints procedure sets out that we aim to update residents every 5 working days, or at a frequency agreed with residents. An audit trail of contact relating to complaints is kept on the complaint record. Where it is not possible to provide a full response and an investigation is ongoing, we will provide an update with residents to ensure that they understand the progress to date.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints procedure • Complaints responses examples • Complaints system
4.16	Should	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture	YES	<p>We currently seek feedback from residents on our overall approach to complaint handling as part of our overall customer satisfaction approach, aligned to the Tenant Satisfaction Measures. This has been strengthened by introducing post complaint transactional surveys.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • TSM Satisfaction Survey
4.17	Should	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>As part of complaint management, handlers identify learning outcomes and opportunities for improvement. This information is captured and shared with operational managers for review and discussion with relevant staff and teams to ensure that we improve as a result of complaints</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Learning outcomes
4.18	Should	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>We have reference to unacceptable behaviour within the Complaints Policy and then this is managed through the Customer Contact procedure. All staff taking decisions around contact restrictions will have undergone Equality and Diversity training, and there is an appeals process in place where residents feel that there is any unfair treatment.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Unacceptable behaviour policy and procedure • Complaint Policy

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 5 - Complaint stages				
5.1	Must	Landlords must respond to the complaint within 10 working days 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	<p>Our complaints policy sets out a target of responding to complaints within 10 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman's code. Where an extension is needed to ensure that we are able to respond fully and resolve the issues for a resident are discussed with them.</p> <p>Performance against timescales is report to Executive Committee, Group Housing Board and Group Board.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints performance information
5.5	Must	<p>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.</p> <p>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>	YES	<p>We respond to all complaints when the answer is known and in line with our SLAs. Where further actions are identified to address the issue, we will inform the customer. We provide customers with an update. Where complaints have follow on actions needed, these are logged as such as remain at that status until the follow on actions are complete.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint procedure • Complaint system specifications • Review of complaint responses
5.6	Must	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	<p>Complaint responses sent to residents are as comprehensive as possible based on each individual complaint. This will set out any rationale for decisions or actions, based on reference to policy, procedure or legislation where needed</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint case quality reviews • Complaint procedure • Review of sampled complaint responses

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
5.8	Must	<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>Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Sample complaint responses • Complaint templates • Complaint procedure • Complaint case audits
5.9	Must	<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 its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	YES	<p>The same principles apply to escalating a complaint as to initially accepting a complaint at stage 1. We do not as a standard refuse customer request to escalate complaint to Stage 2 and see this as an important part of the process. This process is embedded within the complaint system specification to ensure it is monitored. In the exceptional circumstances that there would be a refusal to escalate, this would be confirmed in writing to the resident.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints Procedure • Request to Escalate • Complaint system specifications
5.10	Must	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties</p>	YES	<p>All requests to escalate a complaint are acknowledged by the new complaint handler and contact between complaint handler and resident encouraged. The complaint handler will investigate the scope of a complaint as confirmed in the complaint acknowledgement</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint procedure • Stage 2 complaint responses
5.11	Must	<p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	YES	<p>Our complaints procedure requires that complaints must go through the Stage 1 complaint process before being escalate to stage 2, to ensure that there remains an independent review of any initial decision in line with good practice.</p>

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
5.12	Must	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one	YES	The complaint procedure specifically states that the person investigating a complaint at Stage 2 cannot be the same person as Stage 1.
5.13	Must	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	YES	<p>Our complaints policy sets out the 20-working day SLA for responding to complaints at Stage 2. We can evidence that the average time taken to respond to complaints at Stage 2 is within this timescale. Where there is the need to extend, then this is logged and tracked and discussed with the resident as appropriate.</p> <p>This will be reviewed and amended in April 2024 to 20 days, when the new Housing Ombudsman Code come into effect.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints Policy • Complaints Procedure • Review of Stage 2 complaint responses
5.16	Must	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and; • if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	YES	<p>Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Sample complaint responses • Complaint templates • Complaint procedure • Complaint case quality reviews

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
5.17	Must	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 operate a two-stage complaint process
5.20	Must	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	We operate a two-stage complaint process
5.2	Should	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	YES	<p>Where this is the case, the complaint handler will discuss this with the resident to ensure that they remain informed as to the reason why there is a delay in responding to complaints.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint Policy • Complaint procedure • Complaint case quality reviews • Complaint system notes • Complaint correspondence

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
5.3	Should	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	<p>If a resident ever expresses dissatisfaction with the time taken to resolve a complaint, a member of the management team will discuss this with the resident and either offer to escalate the complaint to Stage 2 or refer the complaint to the Housing Ombudsman.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints procedure
5.4	Should	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	<p>As part of our approach to complaint investigation, complaint handlers will as a standard consider issues within six months of the complaint. However, complaint handlers have, and use, the discretion to consider issues that have occurred over a longer period of time. This will be reviewed and amended in April 2024 to 12 months, when the new Housing Ombudsman Code come into effect.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint procedure • Complaint case quality reviews • Complaint responses
5.7	Should	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	<p>If a resident raises additional issues as part of a complaint, then complaint handlers are empowered to make a judgment as to whether the issues are relevant and timely to support the complaint response. If they are, they will be included in the Stage 1 complaint. If not, then a new complaint will be raised.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints procedure
5.14	Should	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	<p>Where this is the case, the complaint handler will discuss this with the resident to ensure that they remain informed as to the reason why there is a delay in responding to complaints.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint Policy • Complaint procedure • Complaint case quality reviews • Complaint system notes • Complaint correspondence

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
5.15	Should	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	<p>If a resident ever expresses dissatisfaction with the time taken to resolve a complaint, a member of the management team will discuss this with the resident to either reach an agreement or refer the complaint to the Housing Ombudsman.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints procedure • Complaint response letters
5.18	Should	<p>Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint.</p> <p>Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days 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</p>	N/A	We operate a two-stage complaints process
5.19	Should	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 operate a two-stage complaints process

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
Section 6 – Putting things right				
6.1	Must	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	YES	We can evidence that complaint responses are focused on confirming resolutions for the resident and apologising where things have gone wrong. The standard complaint response confirms this as a requirement. Evidence: <ul style="list-style-type: none"> • Complaint procedure • Review of sample complaint responses • Complaint quality reviews
6.2	Must	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	When responding to a complaint, handlers consider a range of impacts and issues when confirming the resolution. First and foremost the team are focused on addressing the underlying cause of the complaint, but then work within a compensation and redress framework to consider other things we can do to put things right. Evidence <ul style="list-style-type: none"> • Complaints policy • Complaints Procedure • Additional Guidance – compensation • Compensation payments • Review of complaint response • Complaint quality reviews
6.5	Must	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	Complaints responses seek to set out the timescale or timeframe that actions will be completed. These are flagged as ‘Follow on Actions’ within the complaint system, or captured separately to enable them to be tracked through by Complaints Works Co-ordination Team. Evidence: <ul style="list-style-type: none"> • Complaint procedure • Complaint system specification and status • Works Co-ordination Team
6.6	Must	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	YES	This forms part of the guidance and framework on compensation Evidence <ul style="list-style-type: none"> • Compensation guidance

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
6.3	Should	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	We track and monitor complaint themes to identify where there are learning opportunities from complaints. Where individual complaints are considered to flag more wide-ranging issues, these are reviewed and if appropriate, case reviews conducted. Root cause and thematic reporting is included in complaints insight reporting to Executive Committee, Group Housing Board and Group Board.
6.7	Should	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	This forms part of our approach to compensation management Evidence <ul style="list-style-type: none"> • Compensation guidance
Section 7 - Continuous improvement and learning				
7.2	Must	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	YES	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Learning outcomes on individual complaints where issues are highlighted are also discussed and raised with individual managers. RSP receive a complaints update at each formal meeting, with questions and scrutiny on this. The complaint community of interest are the key route through for conducting deep dive activity. Evidence: <ul style="list-style-type: none"> • Complaint performance information • Learning outcomes • Complaint Reports to Committees and Board • Case Study
7.3	Should	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	YES	The Executive Director of Corporate Services has been identified as the Executive Board member responsible for complaints. The Chair of Group Housing Board has been identified as the Non-Executive Board member responsible for complaints.

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
7.4	Should	<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 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 	YES	<p>Update reports contain the information shared.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaint reports to Board and Committees • Annual Self-Assessment • HOS Performance Report
7.5	Should	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	YES	<p>Key themes from complaints are flagged regularly to senior management teams to allow for consideration of service improve, business risks and required improvements. We can evidence how the monitoring of complaints has driven ongoing discussion about service improvement. A new Head of Service Improvement was appointed in July 2023 and is further developing this area.</p>

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
7.6	Should	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; • take collective responsibility for any shortfalls identified through complaints rather than blaming others; • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing 	YES	<p>All staff are expected to follow Sanctuary policies and procedures when undertaking their roles. This includes complying with the Complaints Policy and Procedure. We do not have a standard complaint handling objective for all staff; however, the intentions of this requirements are delivered through our described approach. RSP have supported this view.</p>
Section 8 – Self-assessment and compliance				
8.1	Must	<p>Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.</p>	YES	<ul style="list-style-type: none"> • A review of the Ombudsman code was completed in February 2022. • Self-assessment completed in September 2022 following release of the new Code. Published in October 2022. • 2023 self-assessment published in November 2023 to allow consideration for the issue of the Ombudsman Consultation Paper on the Complaint Handling Code. <p>Evidence:</p> <ul style="list-style-type: none"> • Self-assessment documentation
8.2	Must	<p>Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.</p>	YES	<p>The 2023 self-assessment has taken into account recent changes to the complaint handling target operating model and the Ombudsman Consultation Paper on the Complaint Handling Code..</p> <p>Evidence</p> <ul style="list-style-type: none"> • Self-assessment documentation

Appendix 2

Code section	Must / Should	Code requirement	Comply?	Evidence, commentary and any explanations
8.3	Must	<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. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	YES	<p>The outcome of our self-assessment will be sent to our governing body following completion of the self-assessment which is November 2023. Compliance with the Housing Ombudsman code is published on our website.</p> <p>We are continuing to work with our Complaints Community of Interest to consider how we promote the Housing Ombudsman further.</p> <p>Evidence</p> <ul style="list-style-type: none"> • Monthly Board Reports providing updates on complaints performance, Ombudsman publications and regulatory compliance. • Complaint Handling Code on website

