

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>1.2</b>	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>	<b>Yes</b>	Please see extract below from Complaints Policy  <i>2.1 As member of the Housing Ombudsman Scheme we use the same definition for a complaint. A complaint is '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>
<b>1.3</b>	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	<b>Yes</b>	Please see extract below from Complaints Policy  <i>5.1 A customer or a representative makes a direct request for a service that we provide, for example reporting a repair, managing rent account or tenancy agreement issue. All enquiries received via the Executive Teams will be raised as an Enquiry for the Manager of service area to investigate and respond, unless a failure in service has been identified, in which case it will be logged as a complaint and follow the complaints process. We will respond to all Executive enquiries within 10 working days.</i>
<b>1.6</b>	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	<b>Yes</b>	Amendment made to Complaints Policy to include this wording.
<b>1.7</b>	A landlord must accept a complaint unless there is a valid reason not to do so.	<b>Yes</b>	Please see extract below from Complaints Policy  <i>4.1 Generally, dealing with complaints is a straightforward process, but in a minority of cases where this is not the case, we reserve the right to refuse to deal with the complaint or may look to deal with it differently if we feel it is being pursued unreasonably. Examples of</i>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>1.8</b>	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.	<b>Yes</b>	<i>these situations include: - if the expression of dissatisfaction is relating to a failure in service which occurred longer than 6 months ago as we would be unable to investigate adequately; - if (customer led?) legal proceedings have started - if the customer will not engage with us to allow us to investigate the complaint or work with us to come to a solution; - if a customer continues to complain about issues that have already been responded to previously;</i> - if a customer continues to complain about issues that have already been responded to previously and where no additional information or actions can be taken, please refer to Vexatious Complaints Policy. - Where the dissatisfaction can be better assisted via other agencies such as First-Tier Tribunal or legal avenues - if a customer is liaising with us in an abusive or aggressive manner. - If a customer's enquiry is considered to be an 'exception' we will write to the customer setting out in detail an explanation for our decision.
<b>1.9</b>	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.	<b>Yes</b>	

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

**Best practice ‘should’ requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	<p>Please see extract below from Complaints Policy</p> <p><i>5.1 A customer or a representative makes a direct request for a service that we provide, for example reporting a repair, managing rent account or tenancy agreement issue. All enquiries received via the Executive Teams will be raised as an Enquiry for the Manager of service area to investigate and respond, unless a failure in service has been identified, in which case it will be logged as a complaint and follow the complaints process. We will respond to all Executive enquiries within 10 working days.</i></p>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	<p>Our transactional complaints survey includes the following information:</p> <p>To find out more about Irwell Valley Homes complaints process please click <a href="#">here</a>.</p>

## Section 2 - Accessibility and awareness

### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	<p>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.</p>	Yes	<p>Please see extract below from Complaints Policy</p> <p><i>3.1 There are various ways in which a customer can make a complaint or raise a Concern. These include:</i></p> <ul style="list-style-type: none"> <li>• <i>Comments on our website via our compliment, comments and complaint form: <a href="https://www.irwellvalley.co.uk/customers-residents/what-to-expect-fromus/compliments-comments-and-complaints/">https://www.irwellvalley.co.uk/customers-residents/what-to-expect-fromus/compliments-comments-and-complaints/</a></i></li> <li>• <i>By letter</i></li> <li>• <i>By phone</i></li> <li>• <i>By e-mail</i></li> <li>• <i>In person, during home visits or at any of our hubs</i></li> <li>• <i>Live chat</i></li> <li>• <i>App</i></li> <li>• <i>By social media; Facebook, Twitter, Instagram. To ensure we are compliant with GDPR legislation we reserve the right to remove any complaints made from this platform and will liaise directly with customer or their representative.</i></li> </ul>
2.3	<p>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.</p>	Yes	<p>Our complaints policy is available on our website and a physical copy can be sent by request. Customers are reminded of this option in the annual report of which a physical copy is posted to all customers.</p>
2.4	<p>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.</p>	Yes	<p>Please see below links:</p> <p><a href="https://www.irwellvalley.co.uk/for-customers/tenant-information/service-standards-and-policies/#:~:text=colleagues%20with%20res">https://www.irwellvalley.co.uk/for-customers/tenant-information/service-standards-and-policies/#:~:text=colleagues%20with%20res</a></p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
			<p>pect.-,Policies,-A%20host%20of <a href="https://www.irwellvalley.co.uk/contact-us/give-feedback/">https://www.irwellvalley.co.uk/contact-us/give-feedback/</a></p>
2.5	<p>Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.</p> <p>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.</p>	<b>Yes</b>	<p><i>Please see extract below from Complaints Policy</i></p> <p><i>3.2 We will always assist our customer through the complaints process and make reasonable adjustment(s) in line with our Access and Customer Care Policy.</i></p> <p><i>11.1 IVH is committed to treating people with honesty, dignity, respect, and trust. This applies to colleagues, customers potential customers, contractors, and Board Members. At IVH:</i></p> <ul style="list-style-type: none"> <li><i>• Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents.</i></li> <li><i>• Diversity is recognising difference and responding positively to those differences.</i></li> <li><i>• Inclusion is about creating an environment where our services and employment opportunities are accessible to all.</i></li> </ul> <p><i>11.2 IVH will be mindful of the Equality Act 2010 in all its actions and will consider all the protected characteristics of the Act which are: Race, Sex, Gender Reassignment, Disability, Sexual Orientation, Religion or Belief, Age, Marriage/Civil Partnership and Pregnancy and Maternity explicitly. Further to the protected characteristics, IVH will be mindful of socio-economic disadvantage and will do everything in its power to minimise this and other forms of disadvantage.</i></p> <p><i>11.3 All information/literature can be made available in other formats or translated on</i></p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

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			<p>request.</p> <p><i>11.4 We will ensure that this Complaints Policy is accessible to our diverse customers and will consider the different needs of people wishing to make a complaint.</i></p>
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	<p>The complaint handling code and our assessment is provided on our website (<a href="https://irwellvalley.co.uk/2021-22-complaint-handling-code.pdf">2021-22-complaint-handling-code.pdf</a> (<a href="https://irwellvalley.co.uk">irwellvalley.co.uk</a>)) This will be updated with our most current assessment.</p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>2.7</b>	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	<b>Yes</b>	This information is included in our Customer transactional surveys, complaint responses and annual report.
<b>2.8</b>	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	<b>Yes</b>	<p>Please see extract from our complaint acknowledgement template below.</p> <p><i>A few things to note:</i>  <i>If you wish for a representative to deal with your complaint on your behalf, this option is available at your request.</i>  <i>Our complaints and compensation policy is attached in document form, or you can access it on our website <a href="#">here</a>.</i>  <i>If during the complaints process, you raise additional complaints, these will 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, we will log a new complaint.</i>  <i>You have the right to contact the Housing Ombudsman Service at any point throughout your complaint and you can find their details in our complaints policy.</i></p>

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	<p>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.</p>	Yes	<p>Please see extract below from Complaints Policy</p> <p><i>3.1 There are various ways in which a customer can make a complaint or raise a Concern. These include:</i></p> <ul style="list-style-type: none"> <li>• <i>Comments on our website via our compliment, comments and complaint form:</i> <a href="https://www.irwellvalley.co.uk/for-customers/tenant-information/service-standards-and-policies/#:~:text=colleagues%20with%20respect.,Policies,-A%20host%20of"><u>https://www.irwellvalley.co.uk/for-customers/tenant-information/service-standards-and-policies/#:~:text=colleagues%20with%20respect.,Policies,-A%20host%20of</u></a></li> <li>• <i>By letter</i></li> <li>• <i>By phone</i></li> <li>• <i>By e-mail</i></li> <li>• <i>In person, during home visits or at any of our hubs</i></li> <li>• <i>Live chat</i></li> <li>• <i>App</i></li> <li>• <i>By social media; Facebook, Twitter, Instagram. To ensure we are compliant with GDPR legislation we reserve the right to remove any complaints made from this platform and will liaise directly with customer or their representative</i></li> </ul>

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### 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	The Customer Experience and Insights Manager and the Customer Complaints and Liaison Officer are assigned to take responsibility for complaints handling.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>Refresher training for all complaints handlers has been scheduled for September and October which will include the following areas:</p> <ul style="list-style-type: none"> <li>- Complaint’s policy and process</li> <li>- Compensation Policy</li> <li>- Communications guide and writing responses</li> </ul> <p>If any potential conflict is found, a complaint can be passed to manager from another service area.</p>

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	The Customer Complaints and Liaison Officer and Managers receive regular complaints training and are proficient in Mary Gober customer service principles.

### Section 4 - Complaint handling principles

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Yes	<p>Please see extract below from Complaints Policy:</p> <p><i>9.3 We operate a two stage complaints approach and the responsibility and timescale to respond is outlined below:</i></p> <p><b>Acknowledgment</b></p> <p><i>Upon receipt of a complaint, we will acknowledge it within 5 working days of receiving it at stage one of the complaint process.</i></p> <p><b>Stage 1</b></p> <p><i>The Customer Complaints and Liaison Officer will contact the customer within 5 working days to discuss the issue and it will be their aim to provide a response within 10 working days of receiving the complaint.</i></p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>4.2</b>	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.	<b>Yes</b>	<p>Please see extract from our complaint acknowledgement template below.</p> <p><i>I have written an outline of the basis for your complaint based on the information I have available, along with some more information about Irwell Valley Homes complaints process below, however if you have any questions please do let me know.</i></p> <p><i>You complained to Irwell Valley Homes about:</i></p> <ul style="list-style-type: none"> <li>• <i>EXAMPLE</i></li> </ul> <p><i>I understand that to resolve your complaint you are seeking:</i></p> <ul style="list-style-type: none"> <li>• <i>EXAMPLE</i></li> </ul>
<b>4.6</b>	A complaint investigation must be conducted in an impartial manner.	<b>Yes</b>	Our complaint investigations are conducted impartially ensuring we fully investigate all elements of the complaint and look at all available evidence.
<b>4.7</b>	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	<b>Yes</b>	<p>These key principles are included in the job description for the Customer Complaint and Liaison Officer role.</p> <p>At stage 1 and 2 of the complaints process, all responses are reviewed by Heads of Service and the Customer Offer Panel to ensure transparency.</p> <p>All colleagues undertake integrity training and declare any conflicts of interest.</p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>4.11</b>	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	<b>Yes</b>	Please find extract from Complaints policy below: <i>8.2 We will respect customer's preferred method of contact and communicate with them this method. • All communication relating to the complaint will be clear and accurate. When corresponding with the customer we will clarify the current stage of the complaint, detail the findings of the investigation and outline our position within the response.</i>
<b>4.12</b>	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	<b>Yes</b>	Please see extract from our complaints policy below: <i>8.2 We confirm our understanding of/clarify the complaint with the customer.</i> <i>9.1 If a customer makes a complaint about a colleague, the colleague in question will not investigate the complaint and another colleague who has not been involved will be assigned the complaint to investigate.</i> <i>9.2 We echo our fairness in the way we deal with customers in the way we deal with our colleagues. Following an investigation, colleagues will be advised if a complaint has been received about them and will have the opportunity to respond. The colleague will be kept informed of progress and the outcome of the complaint</i>
<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	<b>Yes</b>	Please see extract below from Complaints Policy <i>9.3 The customer will be advised that they can escalate their complaint to stage 2 of the process and will need to notify the Customer Complaints and Liaison Officer of this within 10 working days of receiving stage 1 investigation response. The customer must provide reasons or alternative</i>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
			<i>solution for their request for escalation. Should the customer be dissatisfied with the complaint outcome, they can request to escalate it to stage 2 of the process which will be assigned to Head of Service.</i>
<b>4.14</b>	<p>A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints.</p> <p>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.</p>	<b>Yes</b>	<p>Please see extract below from Complaints Policy:</p> <p>4.1 We reserve the right to refuse to deal with the complaint or may look to deal with it differently if we feel it is being pursued unreasonably. Examples of these situations include:</p> <ul style="list-style-type: none"> <li>- if the expression of dissatisfaction is relating to a failure in service which occurred longer than 6 months ago as we would be unable to investigate adequately;</li> <li>- if (customer led?) legal proceedings have started</li> <li>- if the customer will not engage with us to allow us to investigate the complaint or work with us to come to a solution;</li> <li>- if a customer continues to complain about issues that have already been responded to previously;</li> <li>- if a customer continues to complain about issues that have already been responded to previously and where no additional information or actions can be taken, please refer to Vexatious Complaints Policy.</li> <li>- Where the dissatisfaction can be better assisted via other agencies such as First-Tier Tribunal or legal avenues</li> <li>- if a customer is liaising with us in an abusive or aggressive manner.</li> </ul>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
			- <i>If a customer's enquiry is considered to be an 'exception' we will write to the customer setting out in detail an explanation for our decision.</i>
<b>4.15</b>	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	<b>Yes</b>	This information is stored in the case management module of the Housing Management System (QL) within the complaints workflow, and all notes and contacts are updated by the Customer Complaints and Liaison Officer.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	<b>Yes</b>	Please see link: <a href="#">Customer Voice Vexatious Complaint Procedure Nov 2021.pdf</a>

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### Best practice ‘should’ requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	The Customer Complaints and Liaison Officer manages customers' expectations from the acknowledgment stage to the closure of the complaint. At each stage the customer is updated on timescales. We contact customers using their preferred method of communication and log each contact on CRM to ensure consistency.
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	Upon initial contact with the customer to confirm the scope of the complaint, timescales and when we will next be in touch will be determined. We endeavour to resolve complaint as quickly as possible, ensuring a full investigation has been completed.
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 reasonable.	Yes	<p>Please see extract from our complaint acknowledgement template below.</p> <p><i>A few things to note: If you wish for a representative to deal with your complaint on your behalf, this option is available at your request. Our complaints and compensation policy is attached in document form, or you can access it on our website <a href="#">here</a>. If during the complaints process, you raise additional complaints, these will 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, we will log a new complaint. You have the right to contact the Housing Ombudsman Service at any point throughout your complaint and you can find</i></p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

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			<i>their details in our complaints policy.</i>
<b>4.8</b>	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.	<b>Yes</b>	Where appropriate the complaint handler will include reference to and copies of relevant policies that cover our legal obligations to ensure customers understand our decisions and actions.

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<p>Where a complaint is about a named colleague we will name this colleague, however we will not name colleagues or contractors where this is not the case. Please see extract from our complaints policy below:</p> <p><i>9.1 If a customer makes a complaint about a colleague, the colleague in question will not investigate the complaint and another colleague who has not been involved will be assigned the complaint to investigate.</i></p> <p><i>9.2 We echo our fairness in the way we deal with customers in the way we deal with our colleagues. Following an investigation, colleagues will be advised if a complaint has been received about them and will have the opportunity to respond. The colleague will be kept informed of progress and the outcome of the complaint.</i></p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	<p>Please see extract from Complaint's policy below:</p> <p><i>8.2 We will log all complaints and provide customers with a complaint reference number, details of the Investigation Officer who will liaise with the customer. The Investigation Officer will thorough investigate the complaint with assistance from service area Manager and complaint resolution is sought. The Investigation Officer will be responsible for keeping the customer informed throughout the investigation progress. Timescales for each complaint stage are detailed below.</i></p>
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	<p>We request feedback from all customers who raise a complaint with us once the complaint has been resolved. This is managed through our Customer Insight tool, Qualtrics.</p>
	Landlords should recognise the impact that being complained about can have on future service delivery.	Yes	<p>Our complaints learnings are published on</p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

4.17	<p>Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained</p>		<p>our website quarterly, and relevant managers are engaged to review and collaborate on these outcomes. All complaint handlers receive support from the Complaints team during investigations to ensure they understand the impacts of their response and identify potential learnings.</p> <p>Further training will be delivered to all complaint handlers in September/October 2022 to support this.</p>
4.19	<p>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.</p>	Yes	<p>Please review extract(s) from Customer Voice Vexatious Complaint Procedure:</p> <p><i>2.3 We will periodically review any of the above arrangements that we put into place with customers, to ensure that they remain effective and proportionate and continue to offer customers suitable opportunity to resolve any dissatisfaction they may have.</i></p> <p><i>2.4 Where we find that the current arrangements are no longer working or appropriate, we may remove, alter or add additional arrangements in place to ensure the process remains fit for purpose.</i></p> <p><i>3.1 We do expect there to be very few customers who are unreasonable or vexatious. However, if you believe a customer is becoming unreasonable by how they are communicating with you—or by the complaints they are raising, you should review the historic transactions with the customer in line with the Vexatious Complaints Policy and complete a Justification Report (Appendix 1). This should also be done in conjunction with a Equality Risk Assessment (Appendix 2) to ensure we are taking the correct action, recognize anything that requires reasonable adjustment and our approach is appropriate.</i></p> <p><i>3.2 The report and assessment must be</i></p>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

		<p><i>reviewed and signed off by the Head of Tenancy Services (or Director of Customer Services in their absence) before the customer is registered as vexatious complainant and any action is taken with that customer legal or non-legal</i></p>
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## Section 5 - Complaint stages

### Mandatory ‘must’ requirements Stage

1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Please see extract from complaints policy below:</p> <p><i>9.3 Stage 1 The Customer Complaints and Liaison Officer will contact the customer within 5 working days to discuss the issue and it will be their aim to provide a response within 10 working days of receiving the complaint. The Customer Complaints and Liaison Officer will thoroughly investigate the complaint with support from the service area Manager concerned, it will be their aim to ensure all aspects of the complaint are investigated and provide a full response within 10 working days. If this timescale is not achievable, the Customer Complaints and Liaison Officer will keep the customer informed of the reasons and provide and agree a revised timescale with the customer. This will not exceed a further 10 working days without a good reason and in agreement with the customer.</i></p>
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	All outstanding actions noted in a complaint response are assigned a completion date which is tracked by the complaints team. When the completion date nears, the complaints team will liaise with the complaint handler and customer to ensure the actions are completed.

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

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	Please see extract from complaints policy below: <i>9.3. Customer Complaints and Liaison Officer will thoroughly investigate the complaint with support from the service area Manager concerned, it will be their aim to ensure all aspects of the complaint are investigated and provide a full response within 10 working days</i>
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	Please find stage 1 template response below: <a href="#">Stage 1 Response Template.docx</a>

**Stage 2**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	From April 2021 to March 2022, we had 23 complaints escalate to stage 2. This equates to 5% of the stage 1 complaints raised. All complaints escalated to stage 2 were investigated and responded to
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	When any complaint escalated to stage 2, we clarify the scope of an escalation, which allows us to determine whether the customer is unhappy with all or part of the original investigation findings.

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

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	Our policy is clear that a complaint can only be escalated to stage 2, once a stage investigation and response have been completed.

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

5.12	<p>The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.</p>	Yes	<p>All stage 2 complaints are escalated to Heads of Service. Please see extract below from Complaints Policy:</p> <p><i>If the customer is dissatisfied with this response or the issue is complex and needs further investigation, the complaint will be assigned to a Head of Service who will contact the customer within the next 5 working days</i></p>
5.13	<p>Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.</p>	Yes	<p>From April 2021 to March 2022, 23 complaints were escalated to stage 2, with all responded to within timescales.</p>
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p><b>And</b></p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	<p>Please find Stage 2 template response below:</p> <p><a href="#"><u>Stage 2 Response Template.docx</u></a></p>

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	<p>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.</p>	<b>Yes</b>	We do not have a third stage in our complaints process.
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	<b>Yes</b>	We do not have a third stage in our complaints process.

**Best practice ‘should’ requirements****Stage 1**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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	Please see extract from complaints policy below: <i>9.3 Stage 1 The Customer Voice Officer will contact the customer within 5 working days to discuss the issue and it will be their aim to provide a response within 10 working days of receiving the complaint. The Customer Voice Officer will thoroughly investigate the complaint with support from the service area Manager concerned, it will be their aim to ensure all aspects of the complaint are investigated and provide a full response within 10 working days. If this timescale is not achievable, the Customer Voice Officer will keep the customer informed of the reasons and provide and agree a revised timescale with the customer. This will not exceed a further 10 working days without a good reason and in agreement with the customer. The customer will be advised that they can escalate their complaint to stage 2 of the process and will need to notify the Customer Voice Officer of this within 10 working days of receiving stage 1 investigation response. The customer must provide reasons or alternative solution for their request for escalation. Should the customer be dissatisfied with the complaint outcome, they can request to escalate it to stage 2 of the process which will be assigned to Head of Service.</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	
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	
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	

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

**Stage 2**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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	Please see extract from complaints policy below: <i>9.4 If the customer is dissatisfied with this response or the issue is complex and needs further investigation, the complaint will be assigned to a Head of Service who will contact the customer within the next 5 working days. We will aim to meet with the customer to discuss the complaint and have a response to the complaint within 20 working days of complaint escalation. If longer is needed to investigate the complaint the customer will be informed of the reasons and will agree a revised timescale with the customer. We will not exceed the further 10 working days without a good reason.</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	<i>response or the issue is complex and needs further investigation, the complaint will be assigned to a Head of Service who will contact the customer within the next 5 working days. We will aim to meet with the customer to discuss the complaint and have a response to the complaint within 20 working days of complaint escalation. If longer is needed to investigate the complaint the customer will be informed of the reasons and will agree a revised timescale with the customer. We will not exceed the further 10 working days without a good reason.</i>

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

**Stage 3**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.18</b>	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	<b>Yes</b>	We do not have a third stage in our complaints process.
<b>5.19</b>	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	<b>Yes</b>	We do not have a third stage in our complaints process.

## Section 6 - Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Please see extract from complaints policy below: <i>8.2 We will always apply the Housing Ombudsman Services' Dispute Resolution principles; of being fair, putting things right and learning from these to improve the customer experience that we are providing. • We will provide advice and support for customers and deal with issues at the earliest possible opportunity. • We will log all complaints and provide customers with a complaint reference number, details of the Investigation Officer who will liaise with the customer. The Investigation Officer will thorough investigation the complaint with assistance from service area Manager and complaint resolution is sought. The Investigation Officer will be responsible for keeping the customer informed throughout the investigation progress. Timescales for each complaint stage are detailed below. • • We will accept complaints made by advocates authorised to act on the customer's behalf. • Should a failure in delivering our service delivery be found during investigation we will agree and implement a solution with the customer, apologise for any inconvenience caused and provide compensation, where appropriate. • We will provide customers with information about how to contact the Housing Ombudsman Service if they would like their complaint to be independently considered where our complaints process has been exhausted and the customer remains dissatisfied. • We will comply with the customer's right to make a complaint to their MP or Local Councillor (Designated Person) if they feel we have not resolved their problem and will provide a response to the Designated Person within 10 working days of receipt. • Full details of all Enquiries, Complaints and Concerns will be recorded and analysed for the purpose of learning with service improvements being identified and implemented. • We will make every effort to adhere to the timescales at each stage of the complaint process, however, there may be times we may not be able to do this and therefore, reserve the right to work outside these timescales. We will, however, advise the customer of revised timescales and keep you updated on the progress the complaint.</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	
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	
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	Please find Compensation Policy below:

### Best practice 'should' requirements

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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	<p>The Customer Offer Panel monitor complaints performance information and improvements made in response to complaints, holding us to account on service improvements.</p> <p>Learnings are reported to Leadership Team, including complaint journey mapping to identify areas for improvement.</p> <p>Our behaviours and the Mary Gober training help us to embed a culture of valuing and learning from complaints.</p>
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	On these occasions we will consult with solicitors to try and reach a resolution

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### 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.	Yes	Complaint learnings and improvements are shared with customers quarterly in our customer offer report. They are also included in our annual report to customers and staff. Our Resident Scrutiny Panel review complaints performance quarterly and a nominated member works closely with the Customer Experience and Insights Manager and the Customer Voice Manager to address improvements.

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

### Best practice ‘should’ requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
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.		This recommendation to be reviewed by Irwell Valley’s board.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</li> </ul> The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.	Yes	Our complaints performance is reported on monthly and quarterly through our quarterly performance pack, this information is shared with our Board and senior managers. This includes Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders. Trends and learnings from complaints are reported quarterly through our customer offer and published on our website. Although we have not received any Ombudsman made findings of severe maladministration or referrals to regulatory bodies, we frequently use individual complaints to case study and review services.

## Appendix 1, Item 10 – Self assessment against Complaint Handling Code

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	Trends and learnings from complaints are reported quarterly through our customer offer and published on our website.
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	<p>Please see extract from complaints policy below:</p> <p><i>1.1 Our aim is to deliver a consistently good customer experience through the services that we provide. We recognise that we may not always achieve this and that there will be times when our customers wish to express their dissatisfaction. We will deal with complaints effectively, with empathy and within set response targets to the customer's satisfaction wherever possible</i></p>

### Section 8 - Self-assessment and compliance

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	The self-assessment is completed and published on the Irwell Valley website annually.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We have not undertaken any significant restructures.

**Appendix 1, Item 10 – Self assessment against Complaint Handling Code**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>8.3</b>	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	<b>Yes</b>	The self-assessment is completed, reviewed by the Irwell Valley Homes Board and the customer offer panel, before being published on the Irwell Valley website annually.