Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as:  '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.	Yes	This is our policy. 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.'
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Therefore, any complainants do not need to use the word complaint for it to be treated as such by us.'
1.6	If further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	We will log all complaints and provide customers with a complaint reference number, and details of who is managing their complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We will accept a complaint unless there is a valid reason not to do so. There are circumstances in which a matter will not be considered as a complaint. For example:  • The issue occurred over six months ago (unless the concern was around safeguarding
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	or health and safety).  • Concerns where legal proceedings have commenced. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.  • Concerns that have previously been dealt with under the

Appendix 1- Self assessment against Complaint Handling Code

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	complaints policy; however, where the problem is a reoccurring issue, we will consider older reports as part of the background to the complaint. • If a customer continues to complain about issues that have already been responded to where no additional information or actions can be take. (Please refer to Vexatious Complaints Policy).  If we do not accept a complaint, we will explain why and provide information about how to take the matter to the Housing Ombudsman.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	IVHs policy reflects the difference between a complaint and a service request
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	Our transactional complaints survey includes the following information:  To find out more about Irwell Valley Homes complaints process please click here.  In addition, any expression of dissatisfaction that is recorded through our transactional survey programme creates an action for us to contact the customer to understand what the issues are and how we can help.

# Section 2 - Accessibility and awareness Mandatory 'must' requirements

<u>/landatory 'must' r</u>	requirements		
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints can be made through the following channels:  • By phone  • Online using our app, website or social media channels  • Via Live Chat  • By e-mail  • In person  • By post  Any issues or enquiries received via a MP or local councillor that meet the complaint definition are also resolved under our complaints process.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our complaints policy is available on our website and a physical copy can be sent by post or any required accessible format by request. The website has an accessibility tool built in so that the policy can be read in different languages, text to voice translation, and different contrast settings. Customers are reminded of all the ways to make a complaint in the annual report which is posted to all customers.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	We have a dedicated section of the website for complaints which is accessible off the main menu. The policy is easy to find on the website in both the complaint section and in our Policies area.  Compliments and complaints - Irwell Valley Homes

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			Information on how to make a complaint is also in our Customer Welcome pack that is given to all new customers, and reminders are published in rent statements and in our annual report.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.  Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	IVH will be mindful of the Equality Act 2010 in all its actions and will consider all the protected characteristics covered by 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.  We will help people through the complaints process and make any reasonable adjustment(s) they need to ensure everyone can access this service. We will ask the complainant if they need any additional support at the point of receiving the complaint and ensure we comply with Equality Act 2010.
			The complaints process will be applied equally to ensure that each complaint is looked at in its own merit, investigated by a trained impartial Manager
			We know the customers may require the document in a different format or language. We will offer to interpreter the contents of the policy in another language.
			The policy will be made available on website, which allows documents to be

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			translated in different languages and formats.
			If a customer makes us aware they have a literacy challenges, we will arrange for it to be provided in a format that meets their needs.
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	Our complaints policy and self-assessment can be found on our website: Compliments and complaints - Irwell Valley Homes.  Reminders about how to make a complaint and also how to refer a complaint to the HOS is published on social media, in rent statements and the annual report. Info is also shared in the welcome pack for new customers.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is included in our customer transactional surveys, complaint responses at every stage, annual report and on our website.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	In all complaint responses (at every stage) we let the complainant know that they have the right to contact the Housing Ombudsman Service at any point throughout their complaint and include the contact details of how to do this.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	We provide an easy and accessible ways for customers to make a complaint and will communicate with customers in their preferred way including social media channels. We will engage in a private chat when any customer raises a complaint or concern on a public channel to ensure security checks and GDPR are met.

Section 3 - Complaint handling personnel Mandatory 'must' requirements- Move up

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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 Rents and Complaints Manager manages the complaints team and process.  The Customer Complaints and Liaison Officers are assigned responsibility for individual complaints handling.  Heads of Service respond and deal with all stage two complaints.  The relevant Executive Director oversees any HOS cases.
3.2	The complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Refresher training for all complaints handlers has been conducted during the year which included  - Complaint's policy and process - Compensation Policy - Communications training  If any potential conflict is found, a complaint can be passed to manager from another service area.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should:  • 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	The Customer Complaints and Liaison Officer and Managers receive regular complaints training and 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	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	<ul> <li>We operate a two stage complaints approach:</li> <li>When we receive a complaint, we will acknowledge it within 5 days.</li> <li>We will share a summary of the complaint, details of the Investigating Manager and the resolution sought from the customer, as well as a copy of our complaints policy.</li> <li>The investigating manager will contact the customer to understand their concerns and what they want to resolve their complaint.</li> <li>Customers are reminded of their right to contact the Housing Ombudsman throughout their complaint.</li> </ul>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Please see extract from our complaint acknowledgement template below.  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 You complained to Irwell Valley Homes about:  • EXAMPLE I understand that to resolve your complaint you are seeking:  • EXAMPLE
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We will deal with customer complaints effectively and empathetically using the Housing Ombudsman Services' Dispute Resolution principles:  Our complaint investigations are conducted impartially ensuring we fully investigate all elements of the complaint and consider all evidence available.
4.7	The complaint handler must:      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.		These key principles are included in the job description for the Customer Complaint and Liaison Officer role.  All stage 1 responses are reviewed by the Complaints and Liaison officers prior to being distributed. All stage 2 responses are reviewed by Heads of Service to ensure transparency.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			All colleagues undertake integrity training and declare any conflicts of interest.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We provide easy and accessible ways for customers to make a complaint and communicate with customers in their preferred way, making any reasonable adjustments, where appropriate.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:  • set out their position  • comment on any adverse findings before a final decision is made.	Yes	We treat complaints about staff in a fair and transparent manner. An impartial investigating Manager is identified to handle complaints made about staff. The staff member who is the subject of the complaint is given the opportunity to set out their position. HR policies are applied when required based on the findings of the complaint.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	All complaint responses stipulate the time frame within which a complaint can be escalated.  If the customer is dissatisfied with a 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 5 working days of the stage 2 complaint being logged.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints.  Procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We will accept a complaint unless there is a valid reason not to do so. There are circumstances in which a matter will not be considered to be a complaint. For example:  • The issue occurred over six months ago (unless the concern was around safeguarding or health and safety).  • Concerns where legal proceedings have commenced. This is defined as details of the

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			claim, such as the Claim Form and Particulars of Claim, having been filed at court.  Concerns that have previously been dealt with under the complaints policy; however, where the problem is a reoccurring issue, we will consider older reports as part of the background to the complaint.  If a customer continues to complain about issues that have already been responded to where no additional information or actions can be take. (Please refer to Vexatious Complaints Policy).  If we do not accept a complaint, we will explain why and provide information about how to take the matter to the Housing Ombudsman.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	This information is stored in the case management module of the Housing Management System. All notes and contacts are updated by the Customer Complaints and Liaison Officer.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Please see link: Customervoice_Vexatious Complaint Procedure Nov 2021.pdf

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	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, clarify resolution, provide timescales and when we will next be in touch will be determined.  We will action any services at initial point of contact to resolve at the earliest opportunity.  We endeavour to resolve complaints 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	We inform all complaints that if they wish for a representative to deal with their complaint on your behalf, this option is available at their request.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Where 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.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	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.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We log all complaints and provide customers with a complaint reference number, and details of who is managing their complaint. The investigating Manager is responsible for keeping the customer informed throughout the investigation progress.
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	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. Any customers who express dissatisfaction are contacted to understand what we could have done better,
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	All complaint handlers receive support from the Complaints team during investigations to ensure they understand the impacts of their response and identify potential learnings.  Learnings are tracked and monitored through our business transformation team.  Our complaints learnings are published on our website quarterly, and relevant managers are engaged to review and collaborate on these outcomes.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	As part of our Customer Voice Vexatious Complaint Procedure we will periodically review any 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

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they may have.  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.  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—or by the complaints they are raising, colleagues review the historic transactions with the customer in line with the Vexatious Complaints Policy and complete a
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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 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	The Investigating Manager will contact the customer to discuss the issue, thoroughly investigate the complaint with support from the Customer Complaint and Liaison Officer and will aim to provide a response within 10 working days from the date of acknowledgement. If this timescale is not achievable, the Customer Complaint and Liaison Officer/ Investigating Manager 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.
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.

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	Investigating Managers are required to call the customer at the outset to establish the scope of the complaint.  All complaint acknowledgements and responses address every aspect of the complaint as agreed with the customer during the initial contact.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:  • 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	Please find stage 1 template response below: Stage 1 Response Template.docx  Complaints managers review respondes to ensure completion

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	We escalate complaints at the customer's request.  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 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 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; - 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.
		Within the stage 2 response we will always make the customer aware of their right to escalate their complaint to the Housing Ombudsman if they are still unhappy with the decision and how to do this.
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.	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.

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5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Our policy is clear that a complaint can only be escalated to stage 2 once a stage investigation and response have been completed.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	If the customer is dissatisfied with the response at stage one 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 5 working days of the stage 2 complaint being logged.
5.13	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	Our standard is to respond to the complaint in full within 10 working days. Where more time is required to investigate the complaint and issue a full response, time extensions are agreed with the customer
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:  • 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	Please find Stage 2 template response below: Stage 2 Response Template.docx

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We do not have a third stage in our complaints process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:	Yes	We do not have a third stage in our complaints process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	The Investigating Manager will contact the customer to discuss the issue, thoroughly investigate the complaint with support from the Customer Complaint and Liaison
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	Officer and will aim to provide a response within 10 working days from the date of acknowledgement. If this timescale is not achievable, the Customer Complaint and Liaison Officer/ Investigating Manager will keep the customer informed of the reasons and provide and agree a revised timescale with the customer. This will
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	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 if they remain dissatisfied with the
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	outcome of the process and will need to notify the Customer Complaint and Liaison Officer of this within 10 working days of receiving their stage 1 investigation response. The customer must provide reasons or alternative solution for their request for escalation.  The Head of Service will contact 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 we will agree a revised timescale with the customer. We will not exceed the further 10 working days without a good reason. If an extension beyond 10 working days is required to enable us to fully respond to customer's complaints, this will be agreed by both parties.  Within the stage 1 and 2 resolution response we will always make the customer aware of their right to escalate their complaint to the Housing Ombudsman if they are still unhappy with the decision and how to do this

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Extensions are agreed with the customer per the complaints policy.
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	HOS details are provided at acknowledgement, stage 1 and stage 2.

# Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint 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.	Yes	We do not have a third stage in our complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We do not have a third stage in our complaints process.

## **Section 6 - Putting things right**

Mandatory 'must' requirements

Code	Code requirement	Comply:	Evidence, commentary and any explanations
6.1 6.2 6.5	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. 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.  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 Yes Yes	We will be fair, put things right and learn from complaints to improve customer experience.  If we find that we have failed a customer, we will apologise. We will agree and implement a solution with them, and provide compensation, where appropriate.  We have a separate compensation policy for complaint handling. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a customer has been put to as well as any distress and inconvenience caused.  IVH adopt the Mary Gober customer service principles. We will be empathic, respectful in our communication to customers and provide clear timescales. All colleagues undergo Mary Gober training annually.
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	We have a separate compensation policy for complaint handling. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a customer has been put to as well as any distress and inconvenience caused.

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	The Customer Offer Panel monitor complaints performance information and improvements made in response to complaints, holding us to account on service improvements.  Learnings are reported to Leadership
			Team, including complaint journey mapping to identify areas for improvement.  All complaint learnings and service improvements are tracked through the IVH Hive and overseen by the Rents and Complaints Manager and IVH's transformation team. These are reported to leadership and board quarterly.
			Our behaviours and the Mary Gober training help us to embed a culture of valuing and learning from complaints.
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

### **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	We will use complaints to drive continuous learning and improvement. Complaints will be reviewed to identify any common themes and areas for learning. Although, we will actively highlight any major service failures as a matter of urgency and without delay. Any issues identified will be raised with the relevant service area and/or contractor to aid service improvements.  Complaint learnings and improvements are shared with customers quarterly on our website. They are also included in our annual report to customers and staff.  All complaint learnings and service improvements are tracked through the IVH Hive and overseen by the Rents and Complaints Manager and IVH's transformation team. These are reported to leadership and board quarterly.  Our Customer Offer Panel review complaints performance quarterly and a nominated member works closely with Head of Customer and Communities to review culture and learnings.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	A member of the governing body (Adam Warburton) has been appointed.
7.4	As a minimum, governing bodies should receive:  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	Performance information relating to complaints is reported on a quarterly basis to the Board. Trends, learnings, and actions are reported to board twice yearly in the form of a board paper. An appointed member of the board oversees complaint learnings and ensures best practise is shared with other members.  We report back on wider learning and improvements by publishing information to customers, our Resident Scrutiny Panel, our Customer Offer Panel, colleagues, and stakeholders, as well as providing evidence on our website and annual report. This includes Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders.  Individual complaints where failures are identified are reviewed and learnings tracked to improve services.  All complaint learnings and service improvements are tracked through the IVH Hive and overseen by the Rents and Complaints Manager and IVH's transformation team. These are reported to leadership and board quarterly.

Appendix 1- Self	assessment against	Complaint	Handling Code

	Reviews are completed of every compliant escalated to the Housing Ombudsman. Any determinations are reported through Audit and Risk Committee and actions tracked.
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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.		Performance information relating to complaints is reported on a quarterly basis to the Board. Trends, learnings, and actions are reported to board twice yearly in the form of a board paper and overseen by IVH's Leadership team monthly.  Trends and learnings from complaints are reported quarterly to our customer offer panel and published on our website.  All complaint learnings and service improvements are tracked through the IVH Hive and overseen by the Rents and Complaints Manager and IVH's transformation team. These are reported to leadership and board quarterly.  Reviews are completed of every compliant escalated to the Housing Ombudsman. Any determinations are reported through Audit and Risk Committee and actions tracked.
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	Landlords should have a standard objective in relation to complaint <b>Yes</b> handling for all employees that reflects the need to:  • have a collaborative and co-operative approach towards	We aim to deliver a consistently good customer experience through the services that we provide. We recognise that we may
7.6	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.	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.
		All colleagues undertake Mary Gober customer service and EDI training annually.

# **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.
8.3	<ul> <li>Following each self-assessment, a landlord must:         <ul> <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> </li> </ul>	Yes	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.