

Housing Ombudsman Complaint Handling Code: FCHO Self-Assessment August 2023

Mandatory 'must' requirements			
Complaint Code Item	First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance	
Section 1 - Definition of a complaint			
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i></p>	<p>Yes – FCHO Complaints Policy states:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i></p>	None Required
1.3	<p>The resident does not have to use the word 'complaint' for it to be treated as such.</p> <p>A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.</p>	<p>Yes – All expressions of dissatisfaction are logged, even if the word complaint is not used by the customer.</p> <p>Under section 3.5 of FCHO Complaints Policy customers are advised of the following:</p> <p>An advocate or representative may also make and deal with a complaint on a customer's behalf, this includes representation or accompaniment at meetings if reasonable. FCHO will seek the necessary authority before engaging with an advocate or representative. A complaint that is submitted via an advocate or representative will still be handled in line with the complaints policy.</p>	None Required
1.6	<p>... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.</p>	<p>Yes - An option of dealing with an issue via a service request is offered where appropriate and in agreement with customers. Where the definition of a complaint is met and the customer requests it, or when a service request resolution has not been</p>	None Required

		possible within five working days, a complaint is logged and acknowledged no more than five working days after the initial contact from the customer.	
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	<p>Yes – FCHO accept all complaints raised by customers, unless it falls into a valid exclusion as stated in the FCHO’s Complaints Policy:</p> <ul style="list-style-type: none"> • Complaints submitted six months or more after the issue occurred (these will be reviewed on a case-by-case basis to see if there are any reason why they should be treated as complaints e.g., health and safety issues) • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • An initial request for a service e.g., first report of a repair. • Asking for an explanation of a policy or an information leaflet. • A dispute with a neighbour which can be dealt with through the terms outlined in a tenancy agreement or the Anti-Social Behaviour (ASB) policy. anti-social-behaviour-policy-oct-2020-3.pdf (fcho.co.uk) • Complaint about the actions of an organisation that is not working for or supported by FCHO. • Matters that have previously been considered under the complaints policy. <p>If a customer complaint has not been accepted, a detailed explanation will be provided detailing the reasons why the matter is not suitable for the complaints process and the customers right to take that decision to the Ombudsman. Please note that all complaints made will be progressed in line with the Complaints Policy.</p>	None Required
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered,	Yes – FCHO Complaints Policy states that there may be occasions when FCHO is not able to consider a complaint as stated in complaint code item 1.7 above.	None Required

	and these circumstances should be fair and reasonable to residents.		
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 – If FCHO decides not to accept a complaint a full response is provided to the customer setting out the reason(s) the complaint has not been accepted. All letters to customers include their right to take the decision to the Housing Ombudsman.	None Required
Best practice 'should' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
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 -FCHO does recognise the difference between a service request, and a complaint. Service requests can usually be rectified straight away. If further enquiries are needed to resolve the matter, or if the customer requests it, the service request will be escalated to a complaint.	None Required
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 – Section 3.6 of FCHO Complaints Policy states: If a customer has expressed dissatisfaction in response to a feedback survey, FCHO will contact them to discuss their feedback in more detail and provide them with a resolution or an explanation of the next steps they can take. If the feedback is anonymous, a record of it will be kept for performance purposes only.	None Required
Mandatory 'must' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance

Section 2 - Accessibility and awareness			
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 – FCHO customers can make a complaint through multiple routes including: Online – by filling in a complaint form. By phone – 0161 393 7117 - lines are open from 9am to 5pm, Monday to Friday. By post – FCHO Tellus, First Place, 22 Union Street, Oldham, OL1 1BE. In person – First Place, 22 Union Street, Oldham, OL1 1BE, current opening hours can be found on the website or via direct message on Facebook or Twitter.	None Required
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 – FCHO Complaints Policy is available on the FCHO website in a clear format for all customers. The policy is also available in other formats when requested by customers. How to complain - First Choice Homes Oldham (fcho.co.uk)	None Required
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 – FCHO Complaints Policy and process are detailed on FCHO website. How to complain – First Choice Homes Oldham (fcho.co.uk)	None Required
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	Yes - FCHO complies with the Equality Act 2010 and will adapt normal policies, procedures, or processes to accommodate an individual's needs. If a customer requires a reasonable adjustment due to a protected characteristic, they should make us aware of this at the point they make their complaint, or in any dealings with us about their complaint.	None Required

	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.	Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010. All FCHO colleagues undertake yearly training on The Importance of Equality, Diversity, and Inclusion.	
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes – The Complaints Policy, process, and the Housing Ombudsman Code is published on the FCHO website. The Ombudsman details are provided in all complaint's correspondence, and the customer welcome pack. FCHO also promotes the Housing Ombudsman service on our social media channels.	None Required
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes – The Complaint Policy, process, and the Housing Ombudsman Code is published on the FCHO website. The Ombudsman's details are also provided in all complaint's correspondence and in our customer welcome pack. FCHO also promotes the Housing Ombudsman Service on our social media channels.	None Required
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- All correspondence relating to a customers complaint provides details on how to contact the Ombudsman.	None Required
Best practice 'should' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
2.2	Where a landlord has set up channels to communicate with its	Yes - FCHO explain within the Complaints Policy the steps that will be taken when a complaint is received via those channels	None Required

	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.	and how confidentiality and privacy will be maintained when dealing with complaints received via social media channels.	
Mandatory 'must' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
Section 3 - Complaint handling personnel			
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 - FCHO have a designated Customer Excellence Team consisting of two Customer Excellence Officers and one Senior Customer Excellence Officer.	None Required
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes – The Customer Excellence Officers are an independent team that work solely on complaint handling and resolution, the team have completed training provided by the Ombudsman, the team have also undertaken customer service and policy training.	None Required
Best practice 'should' requirements			
Complaint Code Item FCHO Policy		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and 	Yes- The Customer Excellence officers can act sensitively and	None Required

	<p>fairly</p> <ul style="list-style-type: none"> • 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. 	<p>fairly and have undertaken training relevant to the role.</p> <p>Yes – The Customer Excellence Officers have completed customer service and difficult conversation training.</p> <p>Yes – The Customer Excellence Officers engage with Complaints Champions, managers, and Heads of Service from different departments to resolve complaints.</p> <p>Yes – The Customer Excellence Officers have autonomy to resolve all complaints; this also includes requests for gestures of goodwill or compensation up to the value of £150.</p>	
Mandatory ‘must’ requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 4 - Complaint handling principles			
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</p>	<p>Yes – FCHO Customer Excellence Officers utilise a case recording system to document interactions with customers, including efforts to resolve concerns. Officers are instructed to ensure customers are aware of their option to pursue their concerns through the complaints process to ensure no obstruction or unreasonable delay. As per the complaints policy, all complaints receive a written acknowledgement within five working days from receipt of the complaint. Stage 1 and Stage 2 complaints are investigated and responded to in accordance with timescales set out in the Complaint Handling Code.</p>	None Required

	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.		
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 – The FCHO acknowledgment letter sets out the understanding of the complaint and what outcome the customer is seeking.	None Required
4.6	A complaint investigation must be conducted in an impartial manner.	Yes - The Customer Excellence Team is an independent team that works solely on complaint handling and resolution. The team remain impartial when handling customers complaints.	None Required
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes – The Customer Excellence Officers are provided with training to ensure that they are competent in all aspects of complaint handling and sensitive to the needs of customers, this includes accessing training provided by the Housing Ombudsman.	None Required

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes- The Customer Excellence Officers will contact customers to discuss the complaint in more detail. This includes discussing the customer's preferred method of contact and the frequency of the contact. Regular updates will be provided via the customer's preferred contact method.	None Required
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: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes - The Customer Excellence Officers work with customers and complaint Champions to ensure that the complaint is fully understood and the customer (and staff, if applicable) have had fair chance to provide input before a decision is made.	None Required
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes – FCHO Complaints Policy states all escalation timescales for complaints.	None Required
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 – FCHO considers every request to escalate complaints at all stages. Where the request is refused FCHO will provide customers with a full explanation of the decision. Yes – Reasons for refusal to escalate are listed in the Complaints Policy.	None Required
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,	Yes – All FCHO complaints are logged on the complaints system and colleagues are required to keep this up to date. All correspondence and evidence is stored within a document store.	None Required

	all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.		
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 – FCHO Unacceptable and Unreasonable Behaviour Policy was approved in April 2022.	None Required
Best practice ‘should’ requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
4.3	Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes – The Customer Excellence Officer contacts the customer on receipt of their complaint to discuss their desired outcome and what can be achieved.	None Required
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 – FCHO resolution timescales are 10 working days for stage 1 complaints and 20 working days for stage 2 complaints; FCHO will always review each case individually and look to resolve earlier than this timescale when possible.	None Required
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 – Section 3.5 of FCHO Complaints Policy states that: An advocate or representative may also make and deal with a complaint on a customer’s behalf, this includes representation or accompaniment at meetings if reasonable. FCHO will seek the necessary authority before engaging with an advocate or representative. A complaint that is submitted via an advocate or representative will still be handled in line with the complaints	None Required

		policy.	
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 – FCHO sets out clearly the legal responsibilities for both parties. Example where FCHO has duties such as carrying out annual gas servicing and the customer has duties such as access to the property, these legal obligations on both parties would be clearly described as part of any complaint response ensuring both parties are clear on role and responsibility.	None Required
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes – FCHO correspondence with customers does not name individual colleagues or contractors, FCHO will only refer to people by their job title.	None Required
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes - The Customer Excellence Officers maintain contact with the customer throughout their complaint, all interactions are recorded on the complaints system.	None Required
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 – Feedback on FCHO Complaints Policy was sought from the Customer Voice Panel. FCHO also hold a quarterly Complaints Governance meeting attended by the Head of Contact Centre and Complaints, Head of Assurance and five Customer Voice Panel representatives, to discuss complaints performance, lessons learned, case studies, policy updates and Ombudsman updates. Feedback surveys are also sent out to customers following the closure of the complaint.	None Required
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 – Full training is provided to all Complaints Champions, Managers, and senior Managers across the organisation. Regular training is also provided to teams across the organisation regarding FCHO's complaints process. Monthly complaint meetings take place with both Heads of Service and Complaints Champions where case studies are presented, and discussions take place around where improvements can be made.	None Required

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 – section 2.5 of FCHO's Unacceptable and Unreasonable Behaviour Policy states: "We will review how it affects the customer (including a customer's personal circumstances and any reasonable adjustments)".	None Required
Stage 1			
Complaint Code Item FCHO Policy		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
Section 5 - Complaint stages			
5.1	Landlords must respond to a complaint <u>within ten working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further ten days without good reason.	Yes – a stage one written response will be provided within ten workings form receipt of the complaint. If this is not possible an explanation and a date on which the stage one response will be received will be provided. This should not exceed a further ten working days without good reason. Our responses will identify any service failure, outline resolution as appropriate, and share commitments for any follow up.	None Required
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	Yes – FCHO 's response to customers complaints includes the agreed outcome(s) and any timescales for resolution. FCHO will close a complaint when a decision is reached, and the customer will be notified. Where there are actions that need to be taken, for example if the resolution involves carrying out repairs, these will be monitored and tracked until completion of the repairs and the customer will be contacted to ensure they are happy with the work.	None Required

	updates provided to the resident.		
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 – FCHO complaint responses are proofread by the Senior Customer Excellence Officer including quality checks to ensure the response outcome addresses all points raised in the original complaint. Full explanations of all decisions are provided, including reference to the relevant policy, law and good practice where appropriate.	None Required
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"> • 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 and <ul style="list-style-type: none"> • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes -This information is provided in stage one complaints correspondence. Letters are structured using the Ombudsman template which ensures all these requirements are covered.	None Required
Stage 2			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance

5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one, it must be progressed to stage two of the landlord's procedure unless an exclusion ground now applies.</p> <p>In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	<p>Yes – FCHO Complaints Policy states:</p> <p>If FCHO are unable to resolve a complaint to the customer's satisfaction at stage one, a customer can ask to escalate their complaint to the next stage, stage two.</p> <p>The Customer Excellence Officers will also discuss the request to escalate with the customer. If a decision is made to not escalate to stage two, they will provide the customer with full reasons for the refusal. This is also followed up in writing confirming their right to contact the Ombudsman.</p>	None Required
5.10	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	<p>Yes – Upon receipt of an escalation request contact is made with the customer to define the outstanding issues and discuss the outcomes the customer is seeking. This is also set out in the acknowledgment letter that confirms acceptance of the escalation and timescales for response.</p>	None Required
5.11	<p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	<p>Yes – All complaints are initially investigated at stage one.</p> <p>FCHO Complaints Policy states:</p> <p>If FCHO are unable to resolve a complaint to the customer's satisfaction at the stage one, a customer can ask to escalate their complaint to the next stage, stage one of our policy.</p>	None Required
5.12	<p>The person considering the complaint at stage two, must not be the same person that considered the complaint at stage</p>	<p>Yes - FCHO Complaints Policy states:</p> <p>Stage one complaints are investigated by our Complaints Champions, stage two complaints are assigned to a senior</p>	None Required

	one.	manager or Head of Service who has not been involved in the original investigation.	
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes- Stage two complaints are responded to within 20 working days, as per the Complaints Policy and in accordance with the Code, except where there is good reason to extend the timescale. Where this is the case, this is discussed and agreed with the customer and a date on which the stage two response will be received will be provided. This should not exceed a further 10 working days without good reason. Our responses will identify any service failure, outline resolution as appropriate, and share commitments for any follow up.	None Required
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the 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 <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three 	Yes -This information is provided in all stage two complaints correspondence. Letters are structured using the Ombudsman template which ensures all these requirements are covered. FCHO do not have a third stage of the Complaints Policy.	None Required

	<ul style="list-style-type: none"> if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	FCHO stage two response letter provides the customer with full contact details including telephone numbers for the Ombudsman.	
Stage 3			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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- FCHO have a two stage complaint process.	None required
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: the complaint stage <ul style="list-style-type: none"> the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right 	Yes – FCHO do not have a stage three.	None required

	<ul style="list-style-type: none"> • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 		
Best practice ‘should’ requirements			
Stage 1			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 Customer Excellence Officer contacts the customer to advise them of the delay in providing a full response and agrees a new date.	None Required
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 – The Housing Ombudsman contact details are provided to customers in all complaint correspondence.	None Required
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- The Customer Excellence Team and the Complaints Champions carry out a full investigation including reviewing historic data and/or documentation.	None Required

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 - If a customer raises additional complaints during the investigation, FCHO incorporate these within the stage one response. Where customers raise additional issues following the stage one response being completed a new complaint is logged to ensure these issues are fully investigated.	None Required
Stage 2			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – The Customer Excellence Officer contacts the customer and informs them of any delay in providing a full response. They also inform the customer of the new date the complaint response will be issued.	None Required
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 – The Housing Ombudsman contact details are provided to customers in all complaint correspondence.	None Required

Stage 3			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes – FCHO do not have a stage three.	None required
5.19	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 – FCHO do not have a stage three.	None required
Mandatory ‘must’ requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 6 – Putting things right			
	Effective dispute resolution	Yes - In all response letters sent to customers FCHO sets out	None Required

6.1	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.	what went wrong and what we intend to do to put things right. FCHO also review all complaints and identify lessons learned. These are reviewed at the monthly complaints meeting and discussed at the quarterly Complaints Governance meeting attended by five Customer Voice Panel representatives.	
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 – FCHO’s Compensation Policy provides a guide to the Customer Excellence Officer and senior managers in identifying when compensation should be offered. The Ombudsman’s compensation guide is also used to decide on a relevant amount. Any other remedies will be in line with service delivery standards.	None Required
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 – The remedy offered to customers is discussed with them prior to written correspondence being sent out. The correspondence outlines what will happen next and includes timescales for resolution. No complaints are closed until all agreed actions have been resolved.	None Required
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 – FCHO’s Compensation Policy provides a guide to the Customer Excellence Officer and senior managers for identifying when compensation should be awarded. The Ombudsman’s compensation guide is also used to decide on a relevant amount.	None Required
Best Practice ‘should’ requirements			

Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – FCHO records all lessons learned and discuss these at a monthly complaint's champions meeting. As part of this, system failures or process reviews are considered.	None Required
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 – FCHO provides the customer with a resolution to their complaint and when required consult with the Legal Team for specific advice.	None Required
Mandatory 'must' requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 7 – Continuous learning and improvement			
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 – FCHO reports back on wider learning and improvements from complaints within the annual report. FCHO currently reports on learning and improvements on complaints to the Customer Voice Panel, Monthly Complaints and Leadership meetings.	None Required

Best practice 'should' requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – FCHO have a member of the Board appointed to have lead responsibility for complaints.	None Required
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made 	Yes - The information is reported in a quarterly Board report.	None Required

	<p>findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</p> <ul style="list-style-type: none"> The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risk or potential policy and procedures that require revision. They should also be used to inform staff and contractor training.</p>	<p>Yes – FCHO reports back on wider learning and improvements from complaints within the annual report.</p> <p>FCHO currently reports on learning and improvements on complaints to the Customer Voice Panel, Monthly Complaints and Leadership meetings.</p> <p>FCHO also review all complaints and identify lessons learned. These are reviewed at the monthly complaints meeting and discussed at the quarterly Complaints Governance meeting attended by five Customer Voice Panel representatives.</p> <p>This is used to inform staff and contractor training.</p>	
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"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams 	<p>Yes – FCHO’s induction process provides new colleagues with an overview of complaint handling, this includes one day shadowing with a Customer Excellence Officer.</p> <p>Additionally Heads of Service and Complaints Champions undertake additional complaint handling training and have monthly complaint review meetings where best practice is shared.</p> <p>FCHO Customer Excellence Officers undertake the complaints training delivered by the Housing Ombudsman this includes the ‘How to handle complaints effectively,’ The Customer Excellence</p>	None Required

	<p>and departments</p> <ul style="list-style-type: none"> 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. 	<p>Team is required to read and understand the CIH professional code of conduct.</p> <p>FCHO have also introduced Behavioural Competencies: these are included as part of objective setting and staff check ins.</p>	
Mandatory 'must' requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 8 - Self-assessment and compliance			
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 – FCHO will carry out an annual self-assessment in April each year as recommended by the Housing Ombudsman.	None Required
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes – If a significant restructure and/or changes to a procedure occurs, FCHO will carry out a self-assessment.	None Required
8.3	Following each self-assessment, a landlord must:		Further Action Required: A link to the self-assessment will be included in the annual

	<ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance. 	<p>Yes – The outcome of the self- assessment will be presented to the FCHO Board.</p> <p>Yes – The outcome of the self-assessment will be published on FCHO website.</p> <p>No – Previously the self-assessment was not included within the annual report.</p>	<p>report in 2023 and going forward.</p>
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