Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

First Choice Homes Oldham - Housing Ombudsman Service - Complaint Handling Code - Self-assessment form 2024-25

Section 1: Definition of a complaint

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| 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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.' | Yes | Page 4 section 3.1 of FCHO's Complaints Policy states: The definition of a complaint '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 | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. | Yes | FCHO logs all expressions of dissatisfaction, even if the customer does not use the word complaint. Page 5 section 3.5 of FCHO's Complaints Policy customers are informed of the following: 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. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | FCHO does recognise the difference between a service request, and a complaint. Page 5 Section 3.6 of FCHO's Complaints Policy states "A service request is a request from a customer to the landlord requiring action to be taken to put something right." Service requests are not complaints. If the customer is dissatisfied with the response to the service request, even if it is still being addressed, a complaint will be raised. In such cases, we will escalate it to Stage One of our complaints process. All service requests are logged in our inhouse housing management system to ensure tracking and resolution. | |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains. | Yes | If a customer is dissatisfied with the response to the service request, even if it is still being addressed, a complaint will be raised. Page 5 section 3.6 of FCHO's Complaints Policy states If the customer is dissatisfied with the response to the service request, even if it's still being addressed, a complaint will be raised. In such cases, we will escalate it to Stage One of our complaints process. All service requests are logged in our in- house housing management system to ensure tracking and resolution. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes | Page 6 section 3.7 of FCHO Complaints Policy states: If a customer has expressed dissatisfaction in response to a feedback survey, FCHO will contact the customer 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. Where FCHO ask for wider feedback about our services, we will also provide details of how residents can complain. | We also ask customers to give their views about services we provide, through transactional and TSM perception surveys and wider resident engagement feedback from our Customer Voice Groups. We include information on how to make a complaint if they are dissatisfied with these services. |

Section 2: Exclusions

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--------------------------|
| 2.1 | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits | Yes | FCHO accept all complaints raised by customers, unless it falls into a valid exclusion as stated in FCHO's Complaints Policy page 4 section 3.2 Exclusions Complaints submitted twelve months or more after the issue occurred (these will be reviewed on a case-by-case basis to see if there are any reasons 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-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. If FCHO decides not to accept a complaint, | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|---------------------|--|--------------------------|
| | | | 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' | |
| 2.2 | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago. 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. Matters that have previously been considered under the complaints policy. | Yes | FCHO's Complaints Policy page 4 section 3.2 sets out the circumstances in which FCHO will not consider a complaint. 3.2 Exclusions: Complaints submitted twelve months or more after the issue occurred (these will be reviewed on a case-by-case basis to see if there are any reasons 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 <u>anti-social-behaviour-policy-oct-2020-3.pdf</u> (fcho.co.uk) Complaint about the actions of an organisation that is not working for or supported by FCHO. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--------------------------|
| | | | Matters that have previously been considered under the Complaints Policy. If a customer complaint has not been accepted, a detailed explanation will be provided outlining the reasons why the matter is not suitable for the complaints process and the customers right to take that decision to the Housing Ombudsman. Please note that all complaints made will be progressed in line with FCHO's Complaints Policy. | |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Page 6 section 3.7 of FCHO Complaint Policy states: FCHO request that customers, complain within twelve months of an incident occurring to allow the matter to be resolved in a timely manner, if the complaint is received outside of this timescale FCHO may not accept the complaint. FCHO will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.' | |
| 2.4 | If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | FCHO's Complaints Policy states that there may be occasions when FCHO is not able to consider a complaint as stated in complaint code item 2.1 above. If FCHO does not accept the complaint, they will provide the customer with written confirmation detailing the reasons for their decision. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|--------------------------|
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | 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 2.1 above. All complaints are reviewed on an individual basis and a decision made to exclude is made on a case by case basis. | |

Section 3: Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|--------------------------|
| 3.1 | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes | Page 6 section 3.7 of FCHO's Complaints Policy States FCHO offer a range of ways in which customers can make a complaint: 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. Page 6 section 3.7 of FCHO's Complaints Policy states 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 | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| | | | us aware of this at the point they make their complaint, or in any dealings with us about their complaint. Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010. FCHO's Complaints Policy has undertaken an equality impact assessment. All FCHO colleagues undertake yearly training on The Importance of Equality, Diversity, and Inclusion. | |
| 3.2 | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord. | Yes | As stated in 3.1 above customer can make a complaint in several ways. All FCHO colleagues are aware of the complaints process. And are able to pass details of the customers complaint to the Customer Excellence Team. | All Head of Services and Manager and Complaints Champions received training on the revised Complaint Handling Code in April 2024. All Colleagues have completed Customer Service training in 2023/2024. All new colleague with receive Customer Service training as part of their induction. The customer Excellence Team Leader will be running refresher training to all customer facing teams, team meetings during quarter one (April-June) to refresh awareness of the complaints process. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|---------------------|--|--------------------------|
| 3.3 | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain. | Yes | Page 3 section 1.1 of FCHO complaints Policy states First Choice Homes Oldham (FCHO) understands that on occasions customers may not be satisfied with the level of service they have received and that complaints will sometimes be made. Complaints provide an opportunity to understand what customers want from and feel about the services provided. FCHO does not view a high volume of complaints as a negative, FCHO actively promote our Complaints Process and Policy. FCHO are dedicated to ensuring that every customer has a fair and equal access to our complaints process. FCHO are committed to removing any barriers that may hinder customers from submitting complaints, ensuring that everyone's voice is heard, and address concerns effectively. | |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy | Yes | FCHO's Complaints Policy is published on our website. The website also includes a guide on how to make a complaint. Customers can also request a printed copy of the Complaints Policy at our office located at | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--------------------------|
| | must also be published on the landlord's website. | | First Place, 22 Union Street, Oldham, OL1 1BE, or by telephone, and we will arrange for it to be posted to them upon request. | |
| | | | Page 6 section 3.8 of FCHO's Complaints Policy detail the two stage process, including what will happen at each stage and the response times. | |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code. | Yes | Page 10 section 3.12 of FCHO Complaints states that details of the Policy will be available on our website and promoted periodically on our social media channels A copy of the Policy can be provided upon request. This Policy details the two-stage process, what will happen at each stage, and the timeframes for responding. The policy including information about the Housing Ombudsman Service and the HOS Complaint Handling Code will be published on our website.' | |
| 3.6 | Landlords must 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. | Yes | Page 5 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 | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| | | | 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 FCHO's Complaints Policy. | |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. | Yes | Page 10 section 3.13 of FCHO's Complaints Policy provides customers with details of the Housing Ombudsman. The Ombudsman's contact details are also provided to customers in all complaint correspondence. | |
| | | | Housing Ombudsman | |
| | | | You can always contact the Housing Ombudsman Service at any point during the complaint process for advice and guidance, although they only investigate complaints once we have completed our internal process. Ombudsman can be contacted on the below details: | |
| | | | Housing Ombudsman Address: | |
| | | | Housing Ombudsman Exchange Tower Harbour Exchange Square London E14 9GE | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|------------------|---------------------|---|--------------------------|
| | | | Telephone Number: 0300 111 3000 | |
| | | | E-mail: <u>info@housing-</u> <u>ombudsman.org.uk</u> Website: www.housing- ombudsman.org.uk | |

Section 4: Complaint Handling Staff

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|---|
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties. | Yes | FCHO have a designated Customer Excellence Team, which includes a Head of Customer Service, a Customer Excellence Team Leader, and 3 Customer Excellence Officers, who take responsibility for complaint handling, and liaising with the Ombudsman. Our Executive Director of Customer Experience ensure complaints are reported to the governing body. | The Executive Director of Customer Service is responsible for ensuring complaints are reported to Executive Leadership Team and Board of Management. |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly. | Yes | The Customer Excellence Officers engage with Complaints Champions (designated staff members chosen to deal with complaints across departments), managers, and Heads of Service from different departments to resolve complaints. The Customer Excellence Officers have the authority and autonomy to act to resolve complaints promptly and fairly, which may include: • Calling a complaints case meeting. • Escalating issues for ownership | Stage one complaints are investigated by designated Complaints Champions with the support of the Customer Excellence Officers they have the authority and autonomy to ensure complaints are resolved promptly and fairly. Stage two complaint are investigated by Senior Managers/ Head of Services the Senior Customer Excellence officer will act in supporting capacity and has authority and autonomy to ensure complaints are resolved promptly and fairly. |

| | | | • Challenging statements or findings. Dealing with requests for gestures of goodwill or compensation up to the value of £500. | |
|-----|--|-----|---|--|
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively | Yes | The Customer Excellence officers can act sensitively and fairly and have undertaken training relevant to the role. The Customer Excellence Officers have completed the online Housing Ombudsman training, in-house customer service and difficult conversation training. FCHO prioritise complaints as a fundamental service and allocate resources accordingly to ensure effective resolution. This includes Complaints Champions. Page 3 section 2.3 of FCHO complaints Policy states FCHO adopts a positive culture towards complaints and recognises complaints as a learning opportunity to improve the services provided to customers. | All FCHO Colleagues have completed Customer Services Training in 2023/2024, all new colleagues will receive Customer Service Training as part of their induction. Complaint refresher training will be delivered in team meetings to all colleagues during Q1 and Q2 of 2024-25 with emphasis on complaint handling and learning. The Senior Customer Experience Officer and the Head of Customer Service lead on complaint learning, through the learning from complaints working Group. This group is made up of Managers, Head of Services, colleagues, An FCHO customer, and the Member Responsible for Complaints. |

Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | FCHO has a single Complaints Policy in place to address all customer complaints. Every customer is treated equally under this policy. Page 3 section 2.1 of FCHO's Complaints Policy, | |
| | | | 1.1 The aims of the policy: | |
| | | | • To increase customer satisfaction by resolving complaints confidentially, promptly, in a consistent manner and listening to all feedback. | |
| | | | To ensure all customers are treated fairly when making a complaint. | |
| | | | • To achieve continuous improvement by recording and reviewing areas of service which cause dissatisfaction amongst customers and learning from the trends that are identified. | |
| | | | • To ensure that complaints will be viewed positively, and that action will be taken to carry out an investigation. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|---|
| | | | • To provide an opportunity to put things right; an opportunity to rebuild trust in the landlord-customer relationship. | |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Yes | FCHO does not have additional named stages; we follow a two- stage complaint process. Page 6 section 3.8 of FCHO's Complaints Policy explains our complaints stages. | FCHO has a two stage policy only. |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | FCHO only has a two stage complaints process. Page 6 section 3.8 of FCHO's Complaints Policy explains our complaints stages. | In accordance with the Housing Ombudsman Complaint Handling Code, we adhere to a two stage complaints process. |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes | Page 3 Section 3 of FCHO Complaints Policy, states The Policy applies to complaints made about FCHO services and colleagues. In the event of a complaint concerning a contractor or third party representing FCHO, FCHO will retain responsibility for conducting the investigation into the complaint. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|--|
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Page 3 section 3 of FCHO Complaints Policy states The Policy applies to complaints made about FCHO services and colleagues. In the event of a complaint concerning a contractor or third party representing FCHO, FCHO will retain responsibility for conducting the investigation into the complaint. | |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | Upon receipt of a complaint, the Customer Excellence Officer contacts the customer to outline our understanding of the complaint and the outcomes the customer is seeking. This information is also set out in the acknowledgment letters sent to the customer. | |
| 5.7 | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear. | Yes | FCHO's acknowledgment letters clearly outlines the aspects of the complaint for which we are responsible and those for which we are not responsible. | From the receipt of a complaint, the Customer Excellence Officer will acknowledge the complaint and carefully manage the expectations of customers ensuring that no promises are made on things we cannot deliver or would cause upset to other customers. At all complaint stages the investigating officer will be clear on areas of the complaint they are responsible and where they are not, responsible. This will help to manage customers' expectations |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|---|
| 5.8 | At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. | Yes | From the receipt of a complaint, the Customer Excellence Officer will acknowledge the complaint and carefully manage the expectations of customers ensuring that no promises are made on things we cannot deliver or would cause upset to other customers. At all complaint stages the investigating officer will be clear on areas of the complaint they are responsible and where they are not, responsible. This will help to manage customers' expectations This information is also set out in the acknowledgment letters sent to the customer. We also use our Northgate Complaints module to track progress updates on complaints. The Customer Excellence Officers operates autonomously and impartially, considering all relevant information. | FCHO's have set of Values that all colleagues are expected to adhere to they are as follows: We Care We Act We Keep it simple We Learn We Own All Colleagues have completed Customer Service training in 2023/2024. All new colleague with receive Customer Service training as part of their induction. All investigations and responses are reviewed by the Senior Customer Excellence officer to provide independent oversight and quality assurance. |
| 5.9 | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes | Page 6 section 3.8 OF FCHO's Complaints Policy states : A stage one / two written response will be provided with ten working days at stage one / 20 working days at stage two If this is not possible an explanation and a date on which the stage one response will be | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|---------------------|---|--------------------------|
| | | | 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. FCHO will also provide an explanation to the customer regarding why the complaint has fallen outside the timescales, and we will agree with the customer on suitable times for keeping them informed about their complaint and when we expect the response to be available. | |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | 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. Page 5 section 3.7 of Complaints Policy states: FCHO complies with the Equality Act 2010 and will adapt normal policies, procedures, or processes to accommodate an | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| | | | 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. Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010. Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010. Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010. Any reasonable adjustment requests will be considered in line with the requirements of the Equality Act 2010 and in line with our Reasonable Adjustments Policy. All FCHO colleagues undertake yearly training on The Importance of Equality, Diversity, and Inclusion. | |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code. | 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. FCHO's Complaints Policy page 4 section 3.2 Exclusions: Complaints submitted twelve months or more after the issue occurred (these will be reviewed on a case-by-case | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|------------------|---------------------|--|--------------------------|
| | | | basis to see if there are any reasons 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 <u>anti-social-behaviour-policy- oct-2020-3.pdf (fcho.co.uk)</u> 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. | |
| | | | 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 | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--|
| | | | complaints process and the customers right to take that decision to the Ombudsman. | |
| | | | The reasons for refusal comply with the provision set out in section 2 of the Code. | |
| 5.12 | A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys. | Yes | Page 9 section 3.9 of FCHO's Complaints Policy states: FCHO complaints are managed using our in-house management systems, this will include the original complaint and the date received, all correspondence with the customer, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | FCHO Customer Excellence Officers store all documentation related to a customer complaint in our in-house document store. This includes the original complaint, the date it was received, and all other correspondence and documentation associated with the complaint. The team also use a case management recording system to document the customers complaint, all interactions with the customer and the outcome of the complaint at each stage. The Customer Excellence team utilise a shared Outlook mailbox for customers to send in evidence, communications, and updates on complaints. All officers have access to the shared mailbox. |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Yes | FCHO Complaint Policy and process ensures that customer complaints can be remedied at any stage of the complaints process. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|--------------------------|
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes | FCHO have an Unacceptable and Unreasonable Behaviour Policy. <u>unacceptable-and-</u> <u>unreasonable-behaviour-policy-</u> <u>november-2021.pdf (fcho.co.uk)</u> Where colleagues considering acting in-line with this policy they will consult with an independent manager and the Customer Excellence Team. Subsequently, the Customer Excellence Team will collaborate with staff to determine the appropriate course of action, if necessary. Customers will be notified about the actions FCHO is undertaking and the rationale behind them. The customer will be issued with a letter outlining the reasons for the restriction, the length of time the restriction will remain and how to appeal the decision. Evidence will be collated of all contacts with the customer to ensure the correct decision has been taken. | |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes | The Unacceptable and Unreasonable Behaviour Policy takes into consideration the Equality Act 2010. FCHO also carried out an in-house Equality Impact Assessment on the policy. | |

Section 6: Complaints Stages

Stage 1

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--|
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | FCHO's Customer Excellence Team assesses complaints upon receipt and prioritises those that can be addressed immediately or as promptly as possible to minimise any impact on the customer. Additionally, FCHO has a Reasonable Adjustment Policy in place, which will be utilised as necessary. | |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u> <u>working days of the complaint being</u> <u>received</u> . | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: A complaint will be logged and will be acknowledged within five days of receipt. | The Customer Excellence Officer will contact the customer within 5 working days of a complaint being received and advise the complaint response will be issued within 10 working days. |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged. | Yes | Page 8 section 3.8 of FCHO'S Complaints Policy states: A stage one written response will be provided within ten working days of 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 | Head of Services and Senior Customer excellence officer oversight. KPI Reporting/ Monitoring to track. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| | | | share commitments for any follow up. | |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: If an extension beyond 10 working days is required to enable FCHO to respond to the complaint fully, this should be agreed by both parties. Where agreement over an extension period cannot be reached, FCHO will provide the Housing Ombudsman's contact details so the customer can challenge the plan for responding and/or the proposed timeliness of the response. | Head of Services and Senior Customer Excellence Officer oversight. |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: If an extension beyond 10 working days is required to enable FCHO to respond to the complaint fully, this should be agreed by both parties. Where agreement over an extension period cannot be reached, FCHO will provide the Housing Ombudsman's contact details so the customer can challenge the plan for responding and/or the proposed timeliness of the response. | FCHO provide the customer the opportunity to and escalate their complaint as part of our complaint responses. All complaints correspondence has the Housing Ombudsman Service contact details. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|---|
| 6.6 | A complaint response must be provided 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 promptly with appropriate updates provided to the resident. | Yes | Page 8 section 3.8 of FCHO 's Complaints Policy states: Following investigation of stage one complaints the following will be confirmed in writing to the customer: The complaint stage The complaint definition The decision on the complaint The reasons for any decisions made The details of any remedy offered to put things right Details of any outstanding actions Details of how to escalate the matter to Stage Two if the customer is not satisfied with the outcome The customers right to approach the Housing Ombudsman for advice The Housing Ombudsman contact details FCHO will close a complaint when a decision is reached, and the customer will be notified. Actions outstanding from the complaint are tracked and delivered, with regular updates being provided to our customers | In a complaint response we will include details of any outstanding actions and advise and agree with customer how they will be kept updated on progress of outstanding actions. Customer Insight Partner oversees implementation |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--|
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Page 8 Section 3.8 of FCHO's complaints Policy stages Our responses will identify any service failure, outline resolution as appropriate, and share commitments for any follow up. FCHO's Stage one response letter template clearly requires all complaint response addresses every point of the customers complaint. Where a particular policy has been applied this will be referenced along with the section that is applicable. | As part of complaint investigation, the Customer Excellence officer will ensure all the elements of the complaint are investigated, providing clear reasons for decision and referring to relevant policies, law and good practices where appropriate. The Senior Customer Excellence reviews investigations and responses before they are issued. |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy States: If a customer raises additional complaints during the investigation, 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, the complaint will be logged as a new complaint. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|---|---------------------|---|---|
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: Following investigation of stage one complaints the following will be confirmed in writing to the customer: The complaint stage The complaint definition The decision on the complaint The reasons for any decisions made The details of any remedy offered to put things right Details of any outstanding actions Details of how to escalate the matter to Stage Two if the customer is not satisfied with the outcome The customers right to approach the Housing Ombudsman for advice The Housing Ombudsman contact details This information is provided in Stage One complaints correspondence. Our letters are structured using the Ombudsman template, ensuring that all these requirements are covered | FCHO follows Housing Ombudsman Service complaint response templates guidance and ensures a comprehensive response is shared with the customer. Each response includes. The complaint stage The complaint definition The decision on the complaint 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 customer is not satisfied with the outcome The customers right to approach the Housing Ombudsman for advice The Housing Ombudsman contact details Templates provide a framework to ensure key information is included. Complaint responses are all individual. |

Stage 2

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|---------------------|--|--------------------------|
| 6.10 | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two If all or part of the complaint is not resolved to the customers satisfaction at stage one, FCHO will progress to stage two of FCHO complaints procedure, unless an exclusion ground now applies. In instances where FCHO declines to escalate a complaint this will be clearly communicated in writing, detailing the reasons for not escalating as well as the customer's right to approach the Ombudsman about the decision. FCHO must receive the escalation request, within 28 days of the customer receiving the stage one response. FCHO do not require the customers to tell us about the reasons for their escalation request. | |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two On receipt of the escalation request, FCHO will acknowledge the stage two complaint within five days. FCHO will set out its understanding of issues | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--------------------------|
| | | | outstanding and the outcomes the customer is seeking within the acknowledgment letter. If any aspect of the complaint is unclear, FCHO will ask the customer for further for clarification and the full definition agreed between both parties. | |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | The Customer Excellence Officer will contact the customer to discuss why they are unhappy with the stage 2 response, and the outcome they are seeking. Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two FCHO does not require the customers to provide reasons for their escalation request. | |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two complaints will be handled and investigated by a Head of Service or Senior Manager who will contact the customer to confirm their understanding of the complaint and discuss the reasons for the escalation. The stage two investigation will include a full review of the investigation at stage one and any additional evidence provided by the customer. The | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| | | | colleague dealing with the stage two complaint will not be the same person that dealt with the stage one complaint. | |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: FCHO will provide a written response within 20 working days of the complaint being escalated. If this is not possible, FCHO will provide an explanation to the customer containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Head of Customer Services and Senior Customer Excellence Officer oversight. KPI Reporting |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two If an extension to this timescale is needed when considering the complexity of the complaint FCHO will inform the customer of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) will be clearly explained to the customer. The customer will also be provided with the contact details of the Ombudsman. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|--|
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | The Housing Ombudsman contact details will be provided to the customer. The Housing Ombudsman contact details are also provided to customers in all complaint correspondence and on FCHO's website. | |
| 6.17 | A complaint response must be provided 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 promptly with appropriate updates provided to the resident. | Yes | Page 8 section 3.8 of FCHO's Complaints Policy state: The following will be confirmed in writing to the customer at the completion of Stage Two: The complaint stage The complaint definition The decision on the complaint 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 the customer can escalate the matter to the Housing Ombudsman Service if they remain dissatisfied. The Housing Ombudsman contact details | The Head of Customer Services and the Senior Customer excellence officer reviews investigations and responses before they are issued. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|---|
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | This information is provided in stage two complaint Response. Letters are structured using the Ombudsman template which ensures all these requirements are covered. | |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | This information is provided in all stage two complaints correspondence. Page 8 section 3.8 of FCHO's Complaints Policy state: The following will be confirmed in writing to the customer at the completion of Stage Two: The complaint stage The complaint definition The decision on the complaint The reasons for any decisions made The details of any remedy offered to put things right Details of any outstanding actions Details of how the customer can escalate the matter to the Housing Ombudsman Service if they remain dissatisfied. The Housing Ombudsman contact details Letters are structured using the Ombudsman template which | Head of Service/ Director investigating officers and co-ordinate. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|---|
| | | | ensures all these requirements are covered. | |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | FCHO has a two-stage complaints process, with the stage two response serving as our final response. | Head of Service/ Director investigating officers and co-ordinate. |
| | | | Page 8 section 3.8 of FCHO's Complaints Policy states: Stage two complaints will be handled and investigated by a Head of Service or Senior Manager who will contact the customer to confirm their understanding of the complaint and discuss the reasons for the escalation. The stage two investigation will include a full review of the investigation at stage one and any additional evidence provided by the customer. The colleague dealing with the stage two complaint will not be the same person that dealt with the stage one complaint. These colleagues have the authority to issue a response in accordance with our policy. | |

Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| 7.1 | 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. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. | Yes | Page 9 section 3.10 of FCHO's Complaints Policy states: Putting things right Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong FCHO will acknowledge this and set out the actions already taken, or intends to take, to put things right. These can include but are not limited to: Acknowledging where things have gone wrong Providing an explanation, assistance, or reasons Apologising Taking action if there has been a delay Reconsidering or changing a decision Amending a record Providing a financial remedy Changing policies, procedures, or practices Any remedy offered will reflect the extent of any service failures and the level of detriment caused to the customer as a result. FCHO will carefully manage customer | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|---|--------------------------|
| | | | expectations and not promise anything that cannot be delivered or would cause unfairness to other customers. FCHO will 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 customers. | |
| | | | In all response letters sent to customers FCHO sets out 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. | |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | 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 remedies guide is also used to decide on a relevant amount. Any other remedies will be in line with service delivery standards. | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--------------------------|
| 7.3 | 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 | Page 9 section 3.11 of FCHO's Complaints Policy states: Putting things right Any remedy offered will reflect the extent of any service failures and the level of detriment caused to the customer as a result. FCHO will carefully manage customer expectations and not promise anything that cannot be delivered or would cause unfairness to other customers. 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. | |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | FCHO's Compensation Policy provides a guide to the Customer Excellence Officer and Senior Managers to review when compensation should be awarded, the policy also includes the Ombudsman remedies guide. The Ombudsman's compensation guide is also used to decide on a relevant amount. <u>compensation-</u> <u>policy-may-2021.pdf (fcho.co.uk)</u> | |

Section 8: Self-assessment, reporting and compliance

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|---|
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | To support a positive complaint handling culture information on complaints handling performance will be provided regularly to the Leadership Team and Board. This will include: 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, were applicable. FCHO Annual Complaints Report will detail the overall complaints performance. Individual complaint outcomes where necessary, including were the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. Any themes or trends will be passed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. | Complaint handling performance, satisfaction, learning and service improvements are shared with FCHO Customers Voice groups and in the Annual Report. FCHO'S Board and Customer Experience Customer Group have oversight of Complaint Handling Code self-assessment and Complaints and Compensation Policies. In addition to above any Housing Ombudsman Service complaint determinations and key reports produced as result of their involvement and learning will be shared with ELT, Board and Heads of Service and Managers. Director of Customer Experience will be responsible for the annual report to Board. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--|
| | | | This will also be used to inform colleague and contractor training. | |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this. | Yes | Page 13 section 3.17 of FCHO's Complaints Policy states: The annual complaints performance and service improvement report will be reported to our Board and published on the on the section of the website relating to complaints. The Board's response to the report will be published alongside the report.' | The Executive Director of Customer Service will be responsible for sharing this information with the Board. |
| 8.3 | Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures. | Yes | If a significant restructure and/or changes to a procedure occurs, FCHO will conduct a self- assessment. | |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Page 13 section 3.18 of FCHO's Complaints Policy states: Self-Assessment and Compliance FCHO will carry out an annual self- assessment against the Housing Ombudsman Code of Practice to ensure complaint handling remains in line with its requirements. A self-assessment will also be completed following a significant restructure and/or change in procedures. Following each self-assessment FCHO will: Report the outcome of the self- assessment to the Board. | We are committed to undertaking a review of self-assessment if requested following an Ombudsman investigation. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|--|
| | | | Publish the outcome of the self-assessment on the website. Include the self-assessment in the annual report section on complaints handling performance. | |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes | If FCHO is unable to comply with the Code due to exceptional circumstances such as a cyber incident, we will inform the Ombudsman, provide information to affected customers, and publish this on our website. Additionally, we will provide a timescale for returning to compliance with the Code | FCHO's Head of Customer Services will be responsible of making customers aware if we are compliant with the Code, and in exceptional circumstances where is not possible, we will update our website to reflect this and include timescale when we will be returning compliant with the Code. |

Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|--|--|
| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes | Page 12 section 3.15 of FCHO's Complaints Policy states: A positive complaint handling culture is integral to the effectiveness with which FCHO resolves disputes, the quality of the service provided, the ability to learn and improve, and the relationship with customers. Complaints are regarded as a source of intelligence to identify issues and introduce positive changes to service delivery. | FCHO Head of Customer Services leads a quarterly lessons learned group to review complaint data and identify learning, service improvement, and policy change requirements. The group is made up of Heads of Services, Manager, Colleagues, a customer and the MRC. |
| 9.2 | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes | Page 12 section 3.15 of FCHO's Complaints Policy states: FCHO also aims to learn lessons from the outcome of complaints to improve the services delivered to customers. This will be achieved by: Analysing the complaints received, their outcome and proposed changes as part of its reporting and planning process. Reviewing the outcomes of complaints to identify service delivery improvements. Capturing and recording satisfaction levels with the complaints process, including how complaints have been | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|------------------|---------------------|--|--------------------------|
| | | | handled, to ensure a positive experience for customers. | |
| | | | Ensuring feedback is provided at an operational level to Service Managers to ensure immediate learning on individual cases – such as training or record keeping. | |
| | | | FCHO Business Intelligence Team will also produce regular reports that will be shared with Managers, Leadership, Customer Voice Panel, and Board. The reports will highlight themes and trends which will identification of any systemic issues, serious risks, or areas for organisational improvement. | |
| | | | • Senior management meet monthly to review learnings from complaints and identify improvement opportunities. | |
| | | | The annual report will include the Housing Ombudsman's annual landlord performance report. | |
| | | | • FCHO will inform customers when they have influenced change to policy and improvements to services and will publish findings from complaints regularly on the website, in customer | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| | | | communications as well as in the Annual Report. Colleagues are required to identify learning points before closing a complaint. | |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | Yes | FCHO reports back on wider learning and improvements from complaints within the annual complaints report. FCHO currently reports on learning and improvements on complaints to the quarterly Customer Experience Customer Voice Panel Group, and at Executive Leadership meetings. | FCHO's Customer Experience CVP Group will have oversight of complaint learning, in addition to Executive Leadership team, Heads of Services, Learning from Complaints Group. Board will also receive from July 2024: KPI reporting Any determinations Sector learning and best practice |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Yes | Page 5 section 3.6 of FCHO's Complaints Policy states: Director of Customer Service - will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Head of Customer Services reporting to Complaint Customer Voice Panel Group. Director of Customer Services reporting to Executive Leadership team and Board. |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). | Yes | A Board Member has been appointed as the lead responsible for complaints (MRC). | |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|--|
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes | We have an member of the Board appointed as the MRC. The MRC is a member of the various already established complaints working groups which consists of staff and customers. | |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. | No | In additional to the Annual Complaints report, from July 2024, the governing body will receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings. | |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co- operative approach towards resolving complaints, working | Yes | Page 11 section 3.15 of FCHO's Complaints Policy states: FCHO aims is for all colleagues handling complaints to' understand the need to: Have a collaborative and co- operative approach towards | All new FCHO's colleague undertake a one day induction programme, at the induction they receive an overview of the complaints process. New colleagues are also offered one day shadowing with a Customer Excellence Officer. |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--|---|
| | with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. | | 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. | All FCHO colleagues are responsible for ensuring that they are aware of: The complaints policy, procedure, All teams will receive complaints training by the end of June 2024. And are aware of how customer can raise a complaint. Additionally, Heads of Service and Complaints Champions undertake additional complaint handling training and have monthly complaint review meetings. FCHO Customer Excellence Officers undertake the complaints training delivered by the Housing Ombudsman this includes the 'How to handle complaints effectively,' The Customer Excellence Team is required to read and understand the CIH professional code of conduct. FCHO also has a Learning From complaints working group that is made up of colleague's customer and the MRC Board member, the group reviews complaints data, and identifies and implement learning from complaints. FCHO has also introduced Behavioural Competencies: these are included as part of objective setting and staff check ins. |