

SW9 Community Housing Self-Assessment Housing Ombudsman Complaints Handling Code June 2024



Introduction

In 2024, the Ombudsman, under new powers, updated its Code which came into effect on 1 April 2024.

Landlords must carry out an annual assessment against the Code and publish the results.

| Section 1 – Definition of a complaint | | | |
|---------------------------------------|--|---------|--|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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> | Yes | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ 2023-sw9-ch-complaints-policy-32.pdf ▪ Reinforced in regular training and staff meetings. |
| 1.3 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ Reinforced in regular staff meetings. ▪ Complaints submitted by third party or representatives are handled in line with our complaints policy. ▪ We review each expression of dissatisfaction on its own merits irrespective of whether the resident uses the word "complaint". |
| 1.4 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ Reinforced in regular staff meetings. ▪ As set out in our compliments, complaints and comments leaflet. ▪ 7288-sw9-comp-leaflet_web.pdf ▪ All interaction to be processed on Customer Hub or Northgate. |

Section 1 – Definition of a complaint

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|--|---------|--|
| 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 | <ul style="list-style-type: none"> ▪ Staff are encouraged to identify and log service requests resulting in a complaint. ▪ Reinforced in regular staff meetings. ▪ Staff to liaise with the Customer Resolutions Manager when handling a dissatisfied resident, who will provide further guidance. ▪ Outlined in our customer service promise. <p>SW9 Customer Promise</p> |
| 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 | <ul style="list-style-type: none"> ▪ Survey responses are analysed individually. Where dissatisfaction is evident, contact is made with the complainant when the complainant has consented to contact within the survey. If the person wishes to make a complaint, this will be communicated to the Customer Resolutions Manager and logged as such. ▪ Residents are made aware of how they are able to make a complaint through our website, newsletters, and other publications. |

| Section 2 – Exclusions | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ Outlined in our customer service promise. |
| 2.2 | <p>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.</p> <p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> ▪ 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 | <p>As set out in our complaints policy we will not accept a complaint as a formal complaint under this policy, in the following circumstances:</p> <ul style="list-style-type: none"> ▪ The issue has already been considered through our complaints process at any stage. ▪ The individual has not raised their concerns within 12 months of the issue(s) occurring. ▪ It is the first time we have been made aware of the issue - we need a chance to put it right before investigating it as a complaint. ▪ Legal action has been commenced against SW9 and/or SNG that relates to the subject of the complaint being raised. ▪ The complaint is about a service that we do not provide, or is not our responsibility, including (but not limited to) repairs that are the tenant's responsibility. ▪ The complaint is about matters subject to an insurance claim. However, residents can complain about delays in handling an insurance claim. ▪ The complaint relates to a dispute about a service charge. |

| Section 2 – Exclusions | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 2.2 cont. | | | We accept complaints from our named tenants, shared owners, and leaseholders. Other members of the household and third parties such as the Citizens Advice Bureau can act as advocates, however, we require signed consent from the leaseholder, shared owner or tenant confirming their Authorisation. Where the complainant does not meet any of the above criteria, we will still investigate the concerns raised outside of the Complaints Policy, and respond, usually within 10 working days. |
| 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 | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ Each complaint is considered against our complaints policy. |
| 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 | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ If exclusion policy exercised, matter is logged and responded to as correspondence. Reasons included in response, and explaining can approach Ombudsman. ▪ See 2.2 above. |

| Section 2 – Exclusions | | | |
|------------------------|--|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ Each complaint is considered against our complaints policy. |

| Section 3 – Accessibility and Awareness | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ All channels acceptable: in-person, phone, text, email, website, social media, letter, petition, Google review. ▪ Representatives can make complaints when authorised by the complainant. ▪ Complaints process discussed during staff meetings. ▪ All polices undergo equalities impact assessments. ▪ Safeguarding staff group will discuss any concerns. ▪ As outlined on our website. <p>Compliments, Complaints and Comments SW9</p> |

| Section 3 – Accessibility and Awareness | | | |
|---|--|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ As set out in our complaints policy. ▪ Reinforced in regular training and staff meetings. ▪ As outlined on our website and complaints leaflet. |
| 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 | <ul style="list-style-type: none"> ▪ Complaints are monitored on a weekly basis by SW9 and its parent company, Sovereign Network Group. ▪ KPI's are carried out monthly. ▪ SW9's Board and Services Committee also review complaints data and analyse trends. |
| 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 must also be published on the landlord's website. | Yes | <p>Our complaints policy is available on our website. 2023-sw9-ch-complaints-policy-32.pdf</p> <p>A clear process explaining the two-stage process is outlined on our website. Compliments, Complaints and Comments SW9</p> <p>Our residents' newsletter also contains information.</p> |

| Section 3 – Accessibility and Awareness | | | |
|---|--|---------|--|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | We have a dedicated complaints page on our website: Compliments, Complaints and Comments SW9 |
| 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 | <ul style="list-style-type: none"> As set out in our 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 | <ul style="list-style-type: none"> As set out in our complaints policy. Stage 2 letter provides details of the Housing Ombudsman. The SW9 website contains details on this. |

| Section 4 – Complaint Handling Staff | | | |
|--------------------------------------|--|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> SW9 has a dedicated Customer Resolutions Manager for complaint handling. SW9's parent company, Sovereign Network Group have a dedicated team who manage any Housing Ombudsman enquiries and liaise with the Customer Resolutions Manager at SW9. |

| Section 4 – Complaint Handling Staff | | | |
|--------------------------------------|--|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ The Customer Resolutions Manager has good working relationship across the organisation, working with on a day-to-day basis. ▪ The Customer Resolutions Manager has authority to champion complainants to resolve disputes promptly and fairly. |
| 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 | <ul style="list-style-type: none"> ▪ The Customer Resolutions Manager reports directly to the Executive Director, therefore, immediate access to senior management. ▪ SW9 have in place a Customer Service Promise, and all follow our complaints policy and procedure. ▪ Complaints and lessons learned are reported to the Board and Services Committee. ▪ KPIs are monitored and discussed monthly with Operational Managers and the Senior Leadership Team. ▪ Senior Leadership Team provided with weekly update on active complaints on a weekly basis. |

Section 5 – Complaint Handling Process

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|---|
| 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 | <ul style="list-style-type: none"> As per our Customer Services Promise and complaints policy. |
| 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 | <ul style="list-style-type: none"> As per our complaints policy. SW9 operates on a two-stage process. |
| 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 | <ul style="list-style-type: none"> As per our complaints policy. SW9 operates on a two-stage 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 | <ul style="list-style-type: none"> All complaints are handled directly by SW9. |

Section 5 – Complaint Handling Process

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|--|---------|---|
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | <ul style="list-style-type: none"> ▪ All complaints are handled directly by SW9. |
| 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 | <p>All responses to the complainant reflect the following:</p> <ul style="list-style-type: none"> ▪ The complaint ▪ Outcome sought ▪ Findings ▪ Conclusion ▪ Compensation ▪ Housing Ombudsman info (at Stage 2) |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ When exclusion policy exercised, this is explained to the complainant. ▪ Complaint responses will signpost to third party responsibility for complaints. |

Section 5 – Complaint Handling Process

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind. give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. | Yes | <ul style="list-style-type: none"> ▪ Stage 1 complaint is the responsibility of the Customer Services Manager. ▪ Stage 2 complaint is managed by a senior manager. ▪ Reinforced at staff meetings. |
| 5.9 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ The Customer Resolutions Manager will call the complainant before sending a letter informing them of delay. |
| 5.10 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ Any safeguarding concerns are discussed with the safeguarding group. ▪ The Tenancy Support Officer is involved where the Customer Resolutions Manager deems necessary. ▪ All policies undergo Equalities impact assessments. |

Section 5 – Complaint Handling Process

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|---|
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ Exclusions mirror HOS policy. |
| 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 | <ul style="list-style-type: none"> ▪ All complaints are logged onto Customer Hub and are given a unique case reference number. |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ SW9 also have habitual complaints and violence and aggression policies |

| Section 5 – Complaint Handling Process | | | |
|--|--|---------|--|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ Decisions are made by the Senior Leadership Team. ▪ Decisions are reviewed regularly and can be appealed through the complaints process. ▪ Policy has been equality impact assessed. |

| Section 6 – Complaints Stages – Stage 1 | | | |
|---|---|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ The Customer Resolutions Manager oversees all Stage 1 complaints. ▪ Where an enquiry is deemed a complaint, the Customer Resolutions Manager will initially contact the complainant by telephone to discuss and explain the process as well as retrieve more information. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received. | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. |

| Section 6 – Complaints Stages – Stage 1 | | | |
|---|---|---------|---|
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged. | Yes | <ul style="list-style-type: none"> As per our complaints policy. |
| 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 | <ul style="list-style-type: none"> As per our complaints policy. |
| 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 | <ul style="list-style-type: none"> As per our complaints policy. |
| 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 | The Customer Resolutions Manager forwards complaints onto the relevant service team manager, who will keep the complainant informed and updated of progress, whilst the Customer Resolutions Manager will ensure a formal, well explained response is provided within the timescales of responding to complaints. |

Section 6 – Complaints Stages – Stage 1

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. <p>Each stage responses are clearly set out to explain:</p> <ul style="list-style-type: none"> ▪ The actual complaint. ▪ Outcome sought by the complainant. ▪ Findings of the investigation. ▪ Conclusion ▪ Compensation (if any) ▪ Details of how to progress to next stage, including Housing Ombudsman details. |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ The Customer Resolutions Manager includes related issues to active complaint. If unrelated, this will be discussed with the complainant and raised a new complaint and treated as such. |

| Section 6 – Complaints Stages – Stage 1 | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 6.9 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ Our letter templates outline these clearly. |
| Section 6 – Complaints Stages – Stage 2 | | | |
| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 6.10 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. |
| 6.11 | <p>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.</p> | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ Escalation logged onto Customer Hub. |

Section 6 – Complaints Stages – Stage 2

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ The Customer Resolutions Manager will contact the complainant to discuss and to ascertain why they remain unhappy and what resolution they would like to be achieved. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | <ul style="list-style-type: none"> ▪ Stage 1 complaints are investigated and responded by the Customer Resolutions Manager. ▪ Stage 2 complaints are investigated and responded by a member of the Senior Leadership Team. |
| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged. | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. |
| 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ This will be communicated to the complainant in line with the complaints policy. |

Section 6 – Complaints Stages – Stage 2

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 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 | <ul style="list-style-type: none"> Letter confirming this to the complainant. |
| 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 | The Customer Resolutions Manager forwards complaints onto the relevant service team manager, who will keep the complainant informed and updated of progress, whilst a member of the Senior Leadership Team will ensure a formal, well explained response is provided within the timescales of responding to complaints. |
| 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 | <ul style="list-style-type: none"> As per our complaints policy. <p>Each stage responses are clearly set out to explain:</p> <ul style="list-style-type: none"> The actual complaint. Outcome sought by the complainant. Findings of the investigation. Conclusion. Compensation (if any). Details of how to progress to next stage, including Housing Ombudsman details. |

Section 6 – Complaints Stages – Stage 2

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy. ▪ Our letter templates outline these clearly. |
| 6.20 | <p>Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.</p> | Yes | <ul style="list-style-type: none"> ▪ As per our complaints policy. |

Section 7 – Putting Things Right

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
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| 7.1 | <p>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:</p> <ul style="list-style-type: none"> ▪ 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 | <ul style="list-style-type: none"> ▪ As per our complaints policy and procedure. ▪ Letter to complainant will provide explanation. ▪ Decisions on reviewing policies, procedures and practices are discussed with the Senior Leadership Team. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Each complaint is discussed with the relevant services team manager. Remedies offered consider impact to the complainant. This is also explained to the complainant within the response letter. |
| 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 | This is often discussed with the complainant and clearly set out in the response letter. The relevant service team manager is responsible for keeping the complainant informed of any progress or updates on the said remedy. Any compensation, is dealt by the Customer Resolutions Manager. |

| Section 7 – Putting Things Right | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Guidance from the Housing Ombudsman is referred to and explained to the complainant if the need arises. |

| Section 8 – Self-Assessment, Reporting and Compliance | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 8.1 | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> 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 the 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 | <ul style="list-style-type: none"> ▪ Annual self-assessment completion. ▪ Weekly complaints updates provided to the Senior Leadership Team. ▪ Quarterly and annual updates provided to the SW9 Services Committee and Board. ▪ Board is informed immediately of all determinations received from the Housing Ombudsman. ▪ The Customer Resolutions Manager discusses any potential complaints likely to be taken beyond Stage 2. ▪ Relevant policies are reviewed to ensure aligned with the Code. ▪ Residents’ newsletters, annual report will include details of how to complain and data from all received complaints. ▪ The SW9 website will include data on complaints. However, the SW9 parent company produces this information on their website. ▪ Lessons learned discussed with relevant service team areas and improvement measures put in place. ▪ SW9’s parent company also include SW9 data in their reports, publications and website. |

| Section 8 – Self-Assessment, Reporting and Compliance | | | |
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| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
| 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 | <ul style="list-style-type: none"> ▪ SW9's parent company also include SW9 data in their reports, publications and website. <p>Complaints and compliments SNG, formerly Network Homes</p> <ul style="list-style-type: none"> ▪ As per 8.1. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | <p>SW9 will follow lead from its parent company and will review its policies and procedures to align with theirs, however, ensuring that the Stockwell Park Estate residents needs are kept at the forefront. Therefore, we may not always follow the same policies.</p> <p>This is usually discussed at Senior Management and Board level.</p> |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | The Customer Resolutions Manager will review self-assessment on the back of Ombudsman investigation or recommendations. |
| 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 | The Customer Resolutions Manager along with colleagues from SW9's parent company, will lead on notifying the Ombudsman and complainant in the event of non-compliance with the Code. |

Section 9 – Scrutiny and Oversight: Continuous Learning and Improvement

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|--|---------|--|
| 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 | <ul style="list-style-type: none"> ▪ Monthly KPIs. ▪ Quarterly complaints trend analysis and performance reports capture lessons learnt. These are used to amend policy, procedure, training, and awareness materials. ▪ Trend analysis discussed with Senior Management Team. |
| 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 | <ul style="list-style-type: none"> ▪ Complaints are a source of insight along with other feedback to drive improvements. ▪ Complaints are monitored by SW9's Board, Services Committee, SLT. ▪ Lesson learnt and reviews carried out to drive improvement. ▪ Updates to all staff are provided during the all-staff monthly meeting. |
| 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 | <ul style="list-style-type: none"> ▪ SW9 Board and Services Committee (which are resident led) provided with complaints reports. ▪ Annual report. ▪ Residents' newsletter. ▪ You said, We Listened posters on noticeboards. ▪ Information on our website will commence. |
| 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 | The Customer Resolutions Manager oversee all handling of complaints and its processes. Themes and trends are assessed and discussed with SLT periodically. |

Section 9 – Scrutiny and Oversight: Continuous Learning and Improvement

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|---|---------|--|
| 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'). | No | Though this is yet to be introduced, the SW9 Board and Services Committee receive complaint reports, and this is discussed in detail during these meetings. |
| 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 | <p>The SW9 Board and Services Committee receive:</p> <ul style="list-style-type: none"> ▪ Complaints KPIs. ▪ Complaints data including trends and lessons learnt. ▪ All Housing Ombudsman determinations. ▪ Annual report. ▪ The self-assessment will also be included for all future meetings. |
| 9.7 | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> 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. | | <p>The SW9 Board and Services Committee receive:</p> <ul style="list-style-type: none"> ▪ Complaints KPIs. ▪ Complaints data including trends and lessons learnt. ▪ All Housing Ombudsman determinations. ▪ Annual report. ▪ The self-assessment will also be included for all future meetings. <p>The SW9 senior management team receive weekly updates.</p> |

Section 9 – Scrutiny and Oversight: Continuous Learning and Improvement

| Code | Requirement | Comply? | Evidence, commentary, and any explanations |
|------|--|---------|--|
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working 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. | Y | <ul style="list-style-type: none"> ▪ All staff demonstrate the organisations values and behaviours. ▪ Customer care training provided to all staff. ▪ Operational managers provided with additional training. ▪ SW9’s customer service promise embedded into everyday working life for all staff. ▪ Operational managers meetings discuss complaints. ▪ Staff recognition award introduced to improve customer service. ▪ Feedback from surveys used to drive service improvement. ▪ The SW9 complaints policy shared with contractors. ▪ Working closely with contractors on lessons learnt. |