

## Housing Ombudsman's Complaint Handling Code of Practice - Compliance Self-Assessment (November 2020) Trent & Dove Housing Limited ("T&D")

In July 2020, the Housing Ombudsman published its Complaint Handling Code. The Code sets out the processes that the Housing Ombudsman suggests that Housing Associations follow if they chose to be a registered member of the Housing Ombudsman Service. In line with best practice, Trent & Dove Housing has reviewed its complaint handling processes against the Complaint Handling Code. The outcomes are shared with customers, staff and stakeholders below, to demonstrate how Trent & Dove Housing is meeting the requirements of the Code and pursuing our commitment to continuously improving our processes. The outcomes of this Self-Assessment were last reviewed by the Board of Trent & Dove Housing Limited in November 2020.

	What do we have to do?	Do we currently comply with this?	What is the reason / evidence for this? If T&D does not already comply – what are we doing about it?
1.1	Does the complaints process use the following definition of a complaint? <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> .	Not at the moment: <b>ACTION IDENTIFIED</b>	This is a new definition prescribed by the Housing Ombudsman's new Complaint Handling Code 2020. The current Complaints Policy will be updated by 30 November 2020 to include the Housing Ombudsman's new definition of a Complaint.
1.2	Does the current Complaints Policy have exclusions where a complaint will not be considered?	Not at the moment: <b>ACTION IDENTIFIED</b>	Our current Complaints Policy does not currently have a list of exclusions. The current Complaints Policy will be updated to include a definition of what T&D defines as an Exclusion, and why; and a short list of example Exclusions to aid customer understanding. Examples of Exclusions could include where a complainant is not a tenant or service user of T&D or where a separate, formal legal process is already taking place (e.g. a statutory Section 20 Consultation for major works or a statutory ASB case). This work will be included in the full cyclical review of T&D's Complaints Policy which will begin in November 2020 and conclude with the Operations Committee's review and the Board's approval in March 2021.
1.3	Are these exclusions reasonable and fair to residents? Evidence relied upon	N/A	The current Complaints Policy does not include Exclusions. See Action in section 1.2 above.
2	<b>Accessibility</b>		
2.1	Are multiple accessibility routes available for residents to make a complaint?	Yes	T&D offers customers a number of different ways to raise a complaint and these are listed in the Complaints Policy. They include via telephone directly to the Complaints Team or Contact Team, in person, via the T&D website, by letter and via email.
2.2	Is the complaints policy and procedure available online?	Yes	A copy is available on the T&D website.
2.3	Do we have a reasonable adjustments policy?	T&D has something similar – but further review is required. <b>ACTION IDENTIFIED</b>	T&D currently has a Fairness Strategy which sets out how T&D will ensure that customers can fairly and easily access the services we provide. This Strategy will be reviewed to ensure it meets the Housing Ombudsman's criteria of a Reasonable Adjustments Policy. Where required, additional information regarding Reasonable Adjustments will be added into the Strategy, the Strategy will be renamed the "Fairness and Reasonable Adjustments Strategy" and the revised Strategy will be provided to the Strategy Owner (Board) for final review and approval. This work will be included in the routine cyclical review of T&D's Complaints Policy which will begin in November 2020 and conclude with the Operations Committee's review and the Board's approval in March 2021.
2.4	Do we regularly advise residents about our complaints process?	Yes	We advertise and promote the Complaints Policy via T&D's Tenant Scrutiny Forum, via the Board's Operations Committee and via T&D's Customer Advocates. The details and location of the Complaints Policy is also set out in the T&D Customer Promise, a copy of which is shared with all customers.
3	<b>Complaints team and process</b>		
3.1	Is there a complaint officer or equivalent in post?	Yes	T&D has a team of individuals who process and review complaints - the Customer Service and Insight Team. Within the team there is a dedicated Customer Liaison Officer.
3.2	Does the complaint officer have autonomy to resolve complaints?	Yes	The Customer Service and Insight Team have independent autonomy to investigate complaints, agree solutions and make Goodwill Payments ( <i>where Goodwill Payments are identified as being reasonable and appropriate</i> ).
3.3	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	Yes	The Customer Service and Insight Team have the independent autonomy to investigate complaints, agree solutions and make Goodwill Payments ( <i>where Goodwill Payments are identified as reasonable and appropriate</i> ). <ul style="list-style-type: none"> <li>Stage 1 of T&amp;D's Complaints Process is overseen by the Customer Service and Insight Manager, who is a member of T&amp;D's Senior Management Team and reports into T&amp;D's Director of Neighbourhoods.</li> <li>Stage 2 of T&amp;D's Complaints Process is overseen by T&amp;D's Head of Governance, Legal and Compliance, who is also T&amp;D's Company Secretary. They report into T&amp;D's Chief Executive and sit in a separate area of the business to T&amp;D's Customer Service and Insight Team in order to increase autonomy and maintain independence.</li> </ul>
3.4	If there is a third stage to the complaint's procedure are residents involved in the decision making?	N/A to T&D's current Complaints Policy - but further review would be beneficial. <b>ACTION IDENTIFIED</b>	There are currently two formal stages to T&D's Complaints Policy – Stage 1 and Stage 2. However, Stage 1 currently has two parts, Stage 1a (where a complaint is reviewed by a Customer Liaison Officer) and Stage 1b (where the complaint is reviewed by the Customer Service and Insight Manager). When reviewing the Complaints Policy, opportunities will be considered to simplify Stage 1 further; potentially by removing Stage 1b of the Complaints Process. This work will be included in the full cyclical review of T&D's Complaints Policy which will begin in November 2020 and conclude with the Operations Committee's review and the Board's approval in March 2021.
3.5	Is any third stage optional for residents?	N/A	T&D does not have a third Stage to its Complaints Policy process. See comments in 3.4 above.
3.6	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes	Full records of each Complaint at Stage 1 and Stage 2 are kept by the Customer Service and Insight Team.
3.7	At what stage are most complaints resolved?	Stage 1a	Most complaints are resolved by T&D at the first Stage ( <b>Stage 1</b> ) of the Complaints Policy process.
4	<b>Communication</b>		

	What do we have to do?	Do we currently comply with this?	What is the reason / evidence for this? If T&D does not already comply – what are we doing about it?
4.1	Are residents kept informed and updated during the complaints process?	Yes	Customers receive full written responses at all Stages of the Complaints Policy process. They are kept informed in the interim of the progress of their complaint via phone and email. Every opportunity is sought to speak to a customer via telephone to understand the nature of their concerns and manage their expectations.
4.2	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	Yes	Where a decision is made, the reason why Trent & Dove has made this decision, and the information used to come to this decision, is set out in full in the written responses a customer receives at Stage 1 and Stage 2 of the Complaints Process.
4.3	Are all complaints acknowledged and logged within five days?	Yes	Our current Complaints Policy specifies that all complaints must be acknowledged and logged within 2 working days of receipt.
4.4	Are residents advised of how to escalate at the end of each stage?	Yes	The current Complaints Policy advises customers how they can escalate their complaint at the end of each Stage. This information is also reiterated in the complaint letters a customer receives at each stage of the Complaints Process
4.5	What proportion of complaints are resolved at stage one?	98.4%	During 2019/20, <b>98.4%</b> of the Complaints that T&D received were successfully resolved at Stage 1 of the Complaints Process.
4.6	What proportion of complaints are resolved at stage two?	1.6%	During 2019/20, only 4 Complaints were escalated to Stage 2 of the Complaints Process. This represents <b>1.6%</b> of the total complaints received by T&D during the financial year.
4.7	What proportion of complaint responses are sent within Code timescales? (e.g., Stage one, Stage one, Stage two etc).		During 2019/20, <b>98.4%</b> of the Complaints that T&D received were successfully resolved at Stage 1 of the Complaints Process. All responses were sent out within Code timescales. During 2019/20, four Complaints were escalated to Stage 2 of the Complaints Process. This represents <b>1.6%</b> of the total complaints received by T&D during the 2019/20 financial year. All responses were sent out within Code timescales.
4.8	Where timescales have been extended did we have good reason?	Yes	Where timescales were extended, the reason for this was clearly explained to the customer and the reason included in the complaint outcome letters the customer received at Stage 1 and Stage 2. In most cases, timescales were extended to allow more time to gather the detailed information the customer asked for, or to enable further time to review large volumes of information with sufficient scrutiny or consideration
4.9	Where timescales have been extended did we keep the resident informed?	Yes	Where timescales were extended, the reason for this was clearly explained to the customer and the reason included in the complaint outcome letters the customer received at Stage 1 and Stage 2
4.10	What proportion of complaints do we resolve to residents' satisfaction	100% during 2019/20	During 2019/20 all the Complaints that T&D received were successfully resolved by Trent & Dove. 256 Complaints were received during 2019/20, with 4 complaints escalating to Stage 2 and no complaints being escalated to the Housing Ombudsman.
5	<b>Cooperation with Housing Ombudsman Service</b>		
5.1	Were all requests for evidence responded to within 15 days?	Yes	Although no complaints were escalated to the Housing Ombudsman in 2019/20, two complaints have been escalated to the Ombudsman during 2020/21 to-date, both of which were responded to within the timescales prescribed by the Housing Ombudsman. The Housing Ombudsman determined that there was no maladministration by Trent & Dove Housing in either of these cases, and Trent & Dove Housing was found to have operated its Complaints Policy process appropriately and effectively.
5.2	Where the timescale was extended did we keep the Ombudsman informed?	N/A	No extensions were requested by Trent & Dove Housing during 2019/20 or during 2020/21 to-date.
6	<b>Fairness in complaint handling</b>		
6.1	Are residents able to complain via a representative throughout?	Yes	Our current Complaints Policy sets out several ways that customers can use a nominated representative to support and represent them. These include T&D's Customer Advocates (which Trent & Dove Housing have recruited and trained, with new members recruited in the last 6 months and supported by T&D to carry out their roles independently), a family member or friend, their local MP or a Counsellor or a Social Worker or Support Worker.
6.2	If advice was given, was this accurate and easy to understand?	Yes	Our Complaints Policy sets out how customers can use a nominated representative and how they can access one. This advice is also provided by the Customer Service and Complaints Team. During 2019/20, none of the customers who raised a complaint chose to use T&D's Customer Advocates to support them in their complaint.
6.3	How many cases did we refuse to escalate? What was the reason for the refusal?	None	T&D have never refused to escalate a customer's complaint to the next stage of the Complaints Policy process.
6.4	Did we explain our decision to the resident?	N/A	T&D have never refused to escalate a customer's complaint to the next stage of the Complaints Policy process.
7	<b>Outcomes and remedies</b>		
7.1	Where something has gone wrong are we taking appropriate steps to put things right?	Yes	Learning from complaints is a key objective of T&D's Complaints Policy; it enables continuous improvement of T&D policies, processes and services. Key outcomes from complaints are reported to the Board's Operations Committee, who review lessons learnt and make sure Action Plans are in place for all areas of the business. Progress against Action Plans is reviewed by the Operations Committee and key outcomes are reported to the Board.
8	<b>Continuous learning and improvement</b>		
8.1	What improvements have we made as a result of learning from complaints?		Improvements made during 2019/20 as a direct result of complaints include: (a) changes to key policies and internal procedures; (b) enhanced staff training; (c) production of new information leaflets and communication materials for tenants and (d) continuously improving our use of discretion for the award of Goodwill Payments where this is reasonable and appropriate.
8.2	How do we share these lessons with residents? the board/governing body? In the Annual Report?		Information is shared with customers in 'Streetwise' (T&D's Customer Magazine). We will also share the outcomes and key learning from Complaints in the Customer Promise Update, which will be shared with customers every quarter, starting in January 2021. Lessons learnt from Complaints, alongside related operational Action Plans, are shared with the Board's Operations Committee, which is both a tenant group and a board governing body. This information is currently not included in the Customer Annual Report video. Going forward, we will include this information in the Customer Annual Report in line with the Housing Ombudsman's new expectations.
8.3	Has the Code made a difference to how we respond to complaints?	Yes	By completing this Self-Assessment, we have identified <b>4 ACTIONS</b> (set out in sections 1.1, 1.2, 2.3 and 3.4) which will help us to continuously improve our Complaints Policy, process and approach. With the exception of Action 1.1 (which can be actioned immediately), the remaining three actions will be implemented as part of a full cyclical review of T&D's Complaints Policy which will begin in November 2020 and conclude with the Board's review and approval in March 2021 (or sooner).
8.4	What changes have we made?		See response to section 8.3 above.