

**Homes in Somerset** 

Bridgwater House,

King Square,

Bridgwater, TA6 3AR

Phone: 0800 585 360



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#### Introduction

As a member landlord of the Housing Ombudsman Scheme (HOS), Homes in Somerset (HIS) are required to undertake self-assessment against the Housing Ombudsman Service Revised Complaint Handling Code, which became statutory on 1st April 2024.

The Housing Ombudsman Service have provided landlords with a self-assessment form, to check that they are compliant with the Code. In accordance with the requirements of the Code, the Self-Assessment has been submitted to the HiS Sedgemoor Tenants Assurance Committee as the Customer Voice and approved by them at their review meeting on 17<sup>th</sup> July 2025.

Homes in Somerset Board reviewed and approved the report and the self-assessment ahead of submission to the Housing Ombudsman Service. Full minutes of the Board meeting will be available, as approved at their meeting on 29<sup>th</sup> July 2025 and will be available from 3<sup>rd</sup> October 2025 following approval.

A copy of HiS's completed and approved Self-Assessment form is provided below.

#### **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 complaint's 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.



# Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply:<br>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                 | Customer Complaints & Feedback<br>Policy  Section 5.2 "What is a Complaint" contains this definition  | A copy of the Policy can be found on our <u>website</u> or can be available as hard or electronic copy on request.   |
| 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                 | Customer Complaints & Feedback Policy  Section 5.2 "What is a Complaint" outlines a customer does not always have to use the word "complaint" for it to be treated as such. | Contact Centre asks customers if they are making a service request or wishing to log a complaint  Expressions of dissatisfaction from Tenant Satisfaction Measures and survey feedback are followed up with contact from Customer Focus Assistant  Training on good practice in complaints management for all service managers was completed |
| 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  | Yes                 | Customer Complaints & Feedback<br>Policy  | Annual Customers First Toolbox<br>Talks for our colleagues and<br>main contractors includes how<br>colleagues must log and   |



|     | taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.   |     | Section 5.2 describes the difference between service standard and complaint  System generated Customer Relationship Management database used to log all customer contacts  | address expressions of dissatisfaction  |
|-----|--|-----|--|---|
| 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 | Customer Complaints & Feedback Policy  Section 5.2 describes the difference between service request and complaint  Section 5.3 describes what will be considered a complaint, and what will not be treated as a complaint (5.4)  | All customer facing colleagues are empowered to resolve at 1st point of contact wherever possible  Regular refresher training is provided to ensure colleagues are advising customers how their enquiry is going to be logged   |
| 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 | An outsourced agent gathers Tenant Satisfaction Measures responses. A request for contact details of customers expressing dissatisfaction is made to follow up later.  Details on how to make a complaint are included on our website, via social-media, leaflets and posters on communal nnoticeboards. | Acuity is our outsourced agent for Tenant Satisfaction Measures, and they survey 100 customers per month.  Quarterly transactional surveys for complaints, and other key service areas are completed – all dissatisfied comments are followed up (where contact details are provided) so that customer issues are resolved, or an initial complaint can be logged |



#### **Section 2: Exclusions**

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence   | Commentary / explanation  |
|-------------------|--|---------------------|--|---|
| 2.1               | Landlords must accept a complaint unless<br>there is a valid reason not to do so. If<br>landlords decide not to accept a complaint,<br>they must be able to evidence their<br>reasoning. Each complaint must be<br>considered on its own merits  | Yes                 | Customer Complaints & Feedback Policy  Sections 5.3 and 5.4 highlight what will be considered a complaint and what will not be treated as a complaint. | Open Housing system is used to log customer contact. Reasons for refusal of a complaint is included |
| 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                 | Customer Complaints & Feedback Policy Section 5.4 includes what will not be treated as a complaint   |   |
| 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   | Yes                 | Customer Complaints & Feedback<br>Policy   | Consideration outside of the 12-<br>month period is on a case-by-<br>case basis.                    |



|     | 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.  |     | Section 5.4 outlines what will not be treated as a complaint   |   |
|-----|--|-----|--|---|
| 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 | Customer Complaints & Feedback<br>Policy<br>Section 5.4 – what will not be treated<br>as a complaint.  | We advise where other policies and processes are appropriate. E.g. Disrepair claims, Anti-Social Behaviour incident reporting |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | Customer Complaints & Feedback Policy  Section 2.1 Responsibilities of the Customer Focus Manager to oversees the logging, monitoring, and coordination of all initial and formal complaints | All complaints are logged and responded to with no exclusions although not all upheld as service delivery failure             |

# **Section 3: Accessibility and Awareness**

| Code provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation  |
|----------------|--|---------------------|---|---|
| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they | Yes                 | Customer Complaints & Feedback<br>Policy                                | Annual Customers First Toolbox<br>Talks delivered to all teams and<br>our main contractors includes |
|                | can make a complaint. Landlords must consider their duties under the Equality                            |                     | Section 5.3 states "Any contact that expresses dissatisfaction with our | how customers can make a complaint and our duty to  |



|     | Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.  |     | services will be logged as a complaint."   | record and investigate as appropriate.  |
|-----|---|-----|--|---|
| 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 | Customer Complaints & Feedback Policy  Section 5.3 states "Any contact that expresses dissatisfaction with our services will be logged as a complaint."  Customers First Strategy states "we are always reviewing our performance and seeking continuous improvement of service delivery.  This includes our approach to answering and dealing with customer complaints, to ensure that we are complying with the Housing Ombudsman Complaint Handling Code across all areas." | As per 3.1 of this self-assessment  |
| 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 | Customer Complaints & Feedback Policy  Section 8 Monitoring Performance Metrics outlines the information we collect and where it is reported to support transparency and continuous improvement.   | We have a positive culture for welcoming complaints through our Customers First philosophy. |



| 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 | Customer Complaints & Feedback Policy  Section 5 details 2 stage process and periods for responding at each stage.  The policy is available on the website in an accessible format   | Policy is available via post, email or translated version if requested.  Service is promoted through newsletters, website, on social media, and at sign up. |
|-----|--|-----|--|---|
| 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 | Customer Complaints & Feedback Policy  Section 5.8 of the policy includes details of the Housing Ombudsman Service and ways to make contact.  Section 6 - Communication of the Policy sets out we will communicate the policy to customers.  | Response letters to customers also include details for the Housing Ombudsman for advice as well as how to escalate their complaint.                         |
| 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 | Customer Complaints & Feedback Policy  Section 3 – Statement of Intent – Principles include "HiS welcomes third party representation to support customers throughout the complaints process and are committed to ensuring support is available to customers who need our help with sourcing the help of an external advocate." | Representation and support<br>welcomed as needed is echoed<br>in our Vulnerable Persons &<br>Reasonable Adjustments 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 | Customer Complaints & Feedback Policy  Section 5.8 Housing Ombudsman Service outlines how the customer can contact the Housing Ombudsman Service | Information for the Housing<br>Ombudsman service is stated<br>within all complaint responses,<br>newsletters and on our website |
|--|-----|--|-----|--|---|
|--|-----|--|-----|--|---|

#### **Section 4: Complaint Handling Staff**

| Code provision | Code requirement   | Comply:<br>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                 | Customer Complaints & Feedback Policy  Section 2 Responsibilities states in 2.1 Customer Focus Manager are the operational lead for complaints and they ensure compliance with the Complaint Handling Code, including the production of the Annual Complaints Performance and Service Improvement Report |  |
| 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                 | Customer Complaints & Feedback Policy  Section 2 Responsibilities states in 2.1 Customer Focus Manager are the operational lead for complaints. This includes Colleague Engagement. They ensure all colleagues are aware of the  | Customer Focus Manager presents performance reports to the Board |



|     |   |     | content of the policy and are supported in its delivery.  The Customer Focus Manager has appropriate seniority and the support of all Executive Team and Senior Leadership colleagues to respond to and resolve complaints.   |   |
|-----|---|-----|---|---|
| 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 | 'Customer Driven' is a central strand of our Corporate Strategy  Customers First Strategy includes Customers First training and is completed annually for all colleagues and includes Toolbox talks for our main contractors  Bespoke Complaint Handling training completed by service leads. | The customer focus team has recently been enhanced to ensure we can offer full adherence to the code. |

# **Section 5: The Complaint Handling Process**

| Code provision | Code requirement   | Comply:<br>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                 | Customer Complaints & Feedback<br>Policy  Section 4 references the Equality Act<br>2010 and our Vulnerable Persons and<br>Reasonable Adjustments Policy. |                          |



|     |   |     | Equality Impact Assessment completed also outlines all customers are treated fairly, with respect and in a transparent manner.   |   |
|-----|---|-----|--|---|
| 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 | Customer Complaints & Feedback Policy  Section 5 of the policy outlines the 2stage process for handling complaints.  The Policy also outlines what is a service request.   |   |
| 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 | Customer Complaints & Feedback Policy  Section 5 of the policy outlines the 2stage process for managing complaints, including applicable response times at each stage.  The Policy also outlines what is a service request.        |   |
| 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 | Customer Complaints & Feedback Policy  Section 5.6 outlines that a HIS manager will take full responsibility for complaints investigation and response about a contractor to ensure customers are responded to in a timely manner. | Contractors are obliged to support all complaint investigations but not to undertake them themselves.  Contractor meetings include learning and service improvement following a complaint as required |



| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | Customer Complaints & Feedback Policy  Section 2. Responsibilities confirm the Customer Focus Manager is the operational lead for Complaints. They oversee the logging, monitoring, and coordination of all initial and formal complaints.  Section 5.6 states that a manager will take full responsibility for complaints investigation and response about a contractor to ensure customers are | As per 5.4 of this self-<br>assessment  HiS take full ownership of<br>complaints and will liaise with<br>third parties as necessary within<br>the 2-stage process |
|-----|--|-----|--|---|
| 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 | responded to in a timely manner.  Customer Complaints & Feedback Policy  Section 5.2 defines a complaint as stated in the Complaint Handling Code and this is included in aall complaint responses. Customer Focus Manager oversees responses.   | Regular reviews are completed<br>by service leads within the<br>Complaints Learning Panel and<br>as a Senior Leadership team<br>monthly agenda item.              |
| 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 | Customer Complaints & Feedback Policy  Section 5.2 defines a complaint as stated in the Complaint Handling Code and this is included in all complaint responses. Responses are   | As per 5.6 of this self-<br>assessment  |



|      |   |     | overseen and quality checked by the Customer Focus Manager.  |  |
|------|---|-----|--|--|
| 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 | Customer Complaints & Feedback Policy  Section 2 Responsibilities for Customer Focus Manager confirms they are the operational lead for complaints; they provide appropriate support to complainants and ensure all colleagues are aware of the content of the policy and are supported in its delivery.         | HiS actively encourage investigating officers to seek conversations or visits with complainants to fully understand the issues and respond on an individual basis.   |
| 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 | Customer Complaints & Feedback Policy  Section 5.6 highlights timescales for response to a complaint at Stage 1 and 5.7 for complaints at Stage 2 Where this isn't possible, the Customer Focus Manager will clearly communicate this to the customer providing a revised date and an explanation for the delay. | The Customer Focus Manager includes the % and number of complaints that meet this Key Performance Indicator in their reports to Board, Customers and Executive Team. |
| 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  | Yes | Equality Act 2010 referenced in the Customer Complaints & Feedback Policy and Vulnerable Persons & Reasonable Adjustments Policy as a regulatory requirement  Customer Insight Project: data is routinely collected and updated from   |  |



|      | adjustments must be kept under active review.  |     | a variety of sources and recorded on OPEN Housing   |  |
|------|--|-----|---|--|
|      |  |     | Equality Impact Assessment completed for customers wishing to make a complaint so that any vulnerabilities are captured early.  |  |
| 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 | Customer Complaints & Feedback Policy is compliant with section 2 of the Complaint Handling Code.  Section 5.3 provides what will be considered a complaint and 5.4 what will not be treated as a complaint.  We provide an explanation in our response that sets out the reasons why the issue is not suitable for the complaints process. |  |
| 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 | All complaints are recorded on our Customer Relationship Management database – OPEN Housing  All correspondence is held on a document management system, Swordfish.  Records are held as outlined in the HiS Data Retention Policy  |  |
| 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   | Yes | Customer Complaints & Feedback<br>Policy  | As per 3.2 of this self-<br>assessment |





|      | remedies can be provided at any stage of the complaints process without the need for escalation.  |     | Section 5 sets out timeframes for stage 1 and stage 2 responses; our intention is to respond at first point of contact where a customer has made initial contact and is unhappy about our service (5.5)  Remedies and Redress Policy sets out appropriate remedies that can be provided at any stage without the need for escalation        |  |
|------|---|-----|---|--|
| 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 | Unacceptable Behaviour Policy  The Officer Safety Register provides that a panel regularly reviews this to ensure colleague and customer safety.  Any suggested restrictions on contact are regularly reviewed.  A Monthly Compliance report contains information monitoring customer behaviour and repeated breaches of tenancy conditions |  |
| 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 | Policies linked to Customer Complaints & Feedback Policy that reference Equality Act 2010 include:  - Customer Complaints & Feedback Policy  - Vulnerable Persons and Reasonable Adjustments Policy  - Remedies and Redress Policy  | As per 5.14 for this self-<br>assessment |



|  | - Unacceptable Behaviour Policy  |  |
|--|--|--|
|  | Proportionality assessment undertaken to consider whether action proposed is proportionate and demonstrate regard for the provisions of the Equality Act 2010. |  |

#### **Section 6: Complaints Stages**

Stage 1

| Code provision | Code requirement  | Comply:<br>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                 | Customer Complaints & Feedback Policy  Section 5 sets out periods for stage 1 and stage 2 responses. However, we aim to respond to the first point of contact where a customer has made initial contact and is unhappy with our service (5.5).  Processes are in place to support this. | As per 3.2 of this self-<br>assessment  |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.   | Yes                 | Customer Complaints & Feedback<br>Policy  KPI report for Complaint response<br>times within target at Stage 1 and<br>Stage 2 (within 10 or 20 days)   | Future report to be included for acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received. |
| 6.3            | Landlords must issue a full response to stage 1 complaints within 10 working  | Yes                 | Customer Complaints & Feedback<br>Policy  | Reported at Board, Executive Team and customer fora.  |



|     | days of the complaint being acknowledged.   |     | KPI report for Complaint response<br>times within target at Stage 1 and<br>Stage 2 (within 10 or 20 days)   | Available on the website   |
|-----|---|-----|---|--|
| 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 | Customer Complaints & Feedback Policy 2025  Section 5 includes timescale for response. Where this isn't possible, the Customer Focus Manager will clearly communicate this to the customer providing a revised date and an explanation for the delay. | As per 5.9 of this self-<br>assessment   |
| 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 | Customer Complaints & Feedback Policy Information re Housing Ombudsman Service contact is contained within all complaint letter templates (section 5.8)   |  |
| 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 | Complaint management is overseen by the Customer Focus Manager  Weekly system reports from Open Housing are reviewed by Customer Focus Manager and Director of Communities & Customer Services.  Actions are tracked and updated                      | Customer Focus Assistant role<br>ensures any outstanding<br>actions are followed up and<br>completed |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,   | Yes | Customer Complaints & Feedback<br>Policy  | Training for managers provided to support good practice in complaint management.                     |



|     | referencing the relevant policy, law and good practice where appropriate.  |     | Section 5.6 highlights the scope of<br>the investigation and reference to<br>relevant policy, the law and good<br>practice in the response.   | Learning themes are discussed at Complaint learning panel with service leads. |
|-----|--|-----|---|---|
| 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 | Customer Complaints & Feedback<br>Policy<br>Now included in Section 5 following<br>review of the policy.  |   |
| 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 | Customer Complaints & Feedback Policy  Response letter templates at Stage 1 highlight key areas for inclusion in the response letter  Customer Focus Manager role includes quality assurance for responses to complainants. |   |



# **Section 7: Putting things right**

| Code provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation |
|----------------|--|---------------------|---|--------------------------|
| 7.1            | <ul> <li>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: <ul> <li>Apologising.</li> <li>Acknowledging where things have gone wrong.</li> <li>Providing an explanation, assistance or reasons.</li> <li>Acting if there has been delay.</li> <li>Reconsidering or changing a decision.</li> <li>Amending a record or adding a correction or addendum.</li> <li>Providing a financial remedy.</li> <li>Changing policies, procedures or practices.</li> </ul> </li></ul> | Yes                 | Customer Complaints & Feedback Policy Section 5.10 sets out our approach to how we will approach remedies, redress and compensation.  Remedies & Redress Policy Section 1 of this policy sets out what an appropriate remedy could include as provided in the Complaint Handling Code guidance.               |                          |
| 7.2            | Any remedy offered must reflect the impact on the resident because of any fault identified.  | Yes                 | Customer Complaints & Feedback Policy  Section 5.10 sets out our approach to how we will approach remedies, redress and compensation.  Remedies & Redress Policy Section 1 includes "We may also pay compensation in cases where there has been avoidable inconvenience, distress, detriment, or other unfair |                          |



|     | The remody offer must clearly set out what  |     | impact on the customer because of poor service."  Section 5 refers to:   |
|-----|---|-----|--|
| 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 | Section 5 refers to:   |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | Remedies & Redress Policy  Section 13 provides that "The Customer Focus Manager is responsible for overseeing the operational delivery of this policy in line with the Housing Ombudsman's Complaint Handling Code and guidance on remedies and compensation." |





### Section 8: Self-assessment, reporting, and compliance

| Code provision | Code requirement   | Comply:<br>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 because 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. |                     | Annual Complaints Performance Report provided to Housing Ombudsman Service and HiS Board supports that HiS is compliant with the Compliant Handling Code  Section 8 sets out Monitoring Performance Metrics for the policy. This includes:  • The Annual Complaints Performance and Service Improvement Report • Information to monitor performance surrounding customer feedback and complaints  • Complaint handling performance against timescales • Number of stage 1 and stage 2 complaints • Number and outcome of Housing Ombudsman Service enquiries and findings of non- compliance • Reporting against the Tenant Satisfaction Measures • Themes of complaints to identify | Annual Complaints Performance & Service Improvement Report |





|     |   |                            | any points of organisational learning.  Reports are provided as follows:  Sedgemoor Tenants Assurance Committee: Quarterly Update  Senior Leadership Team: Monthly  Executive Team: Three-Monthly  Board: Six-monthly |            |
|-----|---|----------------------------|---|------------|
| 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                        | The Annual Complaints Performance<br>and Service Improvement Report is<br>provided to the Housing Ombudsman<br>Service, HiS Board and Somerset<br>Council   | As for 8.1 |
| 8.3 | Landlords must also carry out a self-<br>assessment following a significant<br>restructure, merger and/or change in<br>procedures.  | Noted.<br>N/A<br>currently |   |            |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Noted.<br>N/A<br>currently |   |            |
| 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. | Noted.<br>N/A<br>currently |   |            |



#### Section 9: Scrutiny & Oversight: continuous learning and improvement

|                |  |                     | •  |                          |
|----------------|--|---------------------|--|--------------------------|
| Code provision | Code requirement   | Comply:<br>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 because of any learning from the complaint.   | Yes                 | Bespoke system reports from OPEN Housing provides a Monthly tracker that identifies complaints upheld / not upheld and complaint themes  A quarterly complaint learning panel review's main themes and identifies opportunities for wider organisational learning.  There is a monthly agenda item for Senior Leadership meetings and quarterly updates provided to Executive 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                 | Customer Board Member is Champion for complaints handling and learning from complaints.  Complaints Learning Panel supports a culture of learning from complaints translating into continuous improvement. Meeting notes are shared via Round Robin and highlight's themes reviewed to ensure ownership of complaints across all service areas.                                    |                          |



|     |  |     | Corporate Strategy and Customers First philosophy embedded across the business through that Strategy.   |  |
|-----|--|-----|---|--|
| 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 | Improvements to our compliance in this area include:  • Property compliance checks in empty / void properties  • Record-keeping and good investigative practice  • How we communicate with neurodiverse customers  • Creation of a Complaint Learning Panel to embed organisation-wide learning.  Customer Newsletter "Neighbourhood Matters" published 3 times per-year on the website and available in hard-copy outlines complaint cases and learning  Sedgemoor Tenants Assurance Committee (STAC) monitor complaint handling performance and use this with customer satisfaction, to commission customer-led scrutiny to assess service improvement. |  |
| 9.4 | Landlords must appoint a suitably senior lead<br>person as accountable for their complaint<br>handling. This person must assess any<br>themes or trends to identify potential systemic   | Yes | The Customer Focus Manager is the designated complaints officer. This role reports directly to Director of Communities and Customer Service.  |  |



|     | issues, serious risks, or policies and procedures that require revision.   |     |   |  |
|-----|--|-----|---|--|
| 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 | Board Champion for Customers is a Customer Board Member. This role is also our member Responsible for Complaints. They provide the forward statement for the Annual Complaints Performance Report and comment on Customers First reports that include complaints.  Our parent authority (Somerset Council) has nominated the Portfolio Holder for Communities as the MRC. Regular monthly meetings are in place to discuss complaint's key themes and actions |  |
| 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 | MRC receives Board papers and attends meetings 6 x times per year. MRC works with Executive team and Senior Leadership team to understand complaints  | Formal training for MRC and<br>Board Member to be agreed in<br>2025-26 |
| 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 | Yes | Annual Complaints Performance and Service Improvement Report forward provided to Board and Somerset Council by Board Champion for Customer and Complaints (last published 30 June 2024)  All Housing Ombudsman Determinations are reported to Board   |  |



progress made in complying with orders related to severe maladministration findings; and

d. annual complaints performance and service improvement report.

at their next meeting. Updates are provided to monitor progress at following meetings.

Tenant Satisfaction Measures reported to Board Champion and Board include

- TP09 Satisfaction with Complaints Handling
- CH01 Number of Stage 1 complaints received per 1000 homes and Number of Stage 2 complaints received per 1000 homes
- CH02 Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales and Proportion of stage 2 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales

Board Champion invited to comment on update reports to Board for Customer First including Complaints updates

reported to Board Champion.

Housing Ombudsman's Complaint Handling Code timescales are cited in our performance monitoring and published on the website







|     |  |     | KPI's reported to Executive Team-<br>Monthly; Audit & Risk Cttee- Quarterly;<br>STAC & Board 6monthly   |  |
|-----|--|-----|---|--|
| 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 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. | Yes | Customers First Strategy embedded across the business as a philosophy embraced by colleagues and our contractors Page 5 sets out what Customers First means for HiS that links directly to our organisational values.  Page 6 highlights How we will get there include:  Culture of the Organisation  Actively engaging and seeking the views of customers by making it easy for them to access our services  Understanding who our customers are  Reviewing services  Continuously Improving |  |





