



Manningham Housing Association

**Housing Ombudsman Complaint Handling Code
Self-Assessment
June 2024**

Background

The Housing Ombudsman (HO) introduced the Complaints Handling Code in July 2020 which sets out good practice for landlords to deal with complaints effectively and fairly. Social landlords have had to meet the obligations within the ombudsman's code since it was introduced three years ago.

In October 2023, the Housing Ombudsman Service consulted on their Complaint Handling Code as part of the Social Housing Regulation Act. Following the consultation, the Housing Ombudsman Service introduced the revised Complaint Handling Code. The Code provides a set of standards for complaint procedures that housing providers are required to comply with.

The Code became statutory on 1st April and places a legal duty on the Ombudsman to monitor whether housing associations comply with the Code. The new Complaint Handling Code helps empower residents who wish to complain. It sets out the statutory requirements for landlords to respond to complaints effectively and fairly.

For residents the Code explains their rights and what can be expected when a complaint is made to a landlord. It also gives information on making and progressing a complaint.

For a landlord, like MHA complying with the Code is a legal requirement and where a landlord does not comply with the code, they could be issued with a complaint handling failure order.

Much of the new Code remains unchanged but there are some notable differences.

- From April 2024 onwards, landlords will need to submit their self-assessment annually to the HO at the same time as they submit their Tenant Satisfaction Measures ('TSMs').
- For landlords with over 1,000 homes this needs to be completed by 30 June 2024.
- Residents must be able to easily access the self-assessment so it must be published on their websites.

Compliance will be monitored by ensuring that landlords:

- Have scrutinised and challenged its compliance with the Code, complaints handling performance and learning from complaints and published the outcomes on its website.
- Complies with the Code in its Complaints Policy, and that any deviations are explained and are reasonable.
- Complies with the Code in practice.

Have a board member who is the Member Representing Complaints ('the MRC').

This Code acts as a guide for residents setting out what they can and should expect from their landlord when they make a complaint and provides the complainant with information about how to make a complaint and how to progress it through the landlord's internal complaints procedure.

Chairs Statement



I can confirm on behalf of the Board members and the Customer Experience Committee of Manningham Housing Association, that members review, scrutinise, and monitor the performance of the association based on the compliments and complaints and the service improvement reports presented on a quarterly basis. The reports give board and committee members assurance that the Association is meeting both its statutory and regulatory responsibilities in relation to property condition and decency standards.




Board members of MHA reviewed at the 22 May 2024 Board meeting the self-assessment against the Housing Ombudsman Complaints Handling Code. Members are assured that the Association complies with the Code and that complaints received from tenants are dealt with in accordance with the Code.

Housing Ombudsman Complaints Handling Code



Self-Assessment Form - June 2024



Section 1: Definition of a complaint


Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
1.2	A complaint must be defined as: <i>‘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.’</i>	Yes	<ul style="list-style-type: none"> Section “3. Definitions – What is a complaint?” MHA Feedback and Complaints Policy  Feedback and complaints Policy.dc	Manningham Housing Association (MHA) has adopted the code requirement definition of a complaint and is included in our Policy.
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	<ul style="list-style-type: none"> Section “3. Definitions – What is a complaint?” MHA Feedback and Complaints Policy  Feedback and complaints Policy.dc	MHA recognises that a customer does not need to use the word “complaint” and can lodge a complaint through a 3 rd party or representatives. Included in MHA’s Policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	Yes	<ul style="list-style-type: none"> Section “3. Definitions – What is a service request” MHA Feedback and Complaints Policy 	MHA recognises the difference between service requests and service failures. Training is provided to all frontline staff to

	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.		 Feedback and complaints Policy.doc	differentiate between the two. Clear definitions of a complaint and service request are defined within MHA's policy.
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	Section "3. Definitions – What is a service request" Feedback and Complaint Policy"  Feedback and complaints Policy.doc	This is standard practice for MHA and is specifically referred to within the Feedback and Complaints policy.
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"> Section "4. Policy Statement" MHA Feedback and Complaint Policy <i>'We actively encourage feedback on services, with both negative and positive comments welcomed. Compliments, comments, and complaints provide an opportunity to improve services; things can be put right, explanations and reasons for actions given and, if necessary, the way things are done can be changed'.</i>  Feedback and complaints Policy.doc	MHA recognises that feedback can take on several forms i.e. compliments, comments, or complaints. Customers unhappy with a service are always advised if they wish to make a complaint and how to do so. This forms part of MHA's complaints handling culture and training for staff. Customers are always given information on how to pursue a complaint should they wish.



Section 2: Exclusions







Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section “3. What is a complaint? We define a complaint as an expression of dissatisfaction.....” MHA Feedback and Complaint Policy  Feedback and complaints Policy.doc	Provision for this standard is set out in MHA's Feedback and Complaints policy as referenced.
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: <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. 	Yes	Section “8. What do we consider not to be a complaint?” MHA Feedback and Complaint Policy  Feedback and complaints Policy.doc	MHA Feedback and Complaints policy sets out circumstances in which a matter will not be considered a complaint: <ul style="list-style-type: none"> • A service request or a request for information • The issue is or has been, subject to legal proceedings. • Liability issue that is subject to an insurance claim • If the issue has already been considered under the Complaints policy previously. • The complaint has not been raised within a reasonable time frame of the issue occurring. We consider 12 months to be a reasonable time frame, although some complaints may be considered in exceptional circumstances such as the



	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			<p>complainant has only become aware of the issue that relates to issues more than 12 months ago.</p> <ul style="list-style-type: none"> Neighbour nuisance or anti-social behaviour reports Reports for a repair Any issue that does not fall within the remit of MHA. Where we feel a complaint is vexatious
2.3	<p>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.</p>	Yes	<p>Section "8. What do we consider not to be a complaint?</p> <p>MHA Feedback and Complaint Policy</p>  <p>Feedback and complaints Policy.dc</p>	<p>This code has been adopted by MHA. Please see above.</p>
2.4	<p>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.</p>	Yes	<p>Section "8. What do we consider not to be a complaint?</p> <p>MHA Feedback and Complaint Policy</p>  <p>Feedback and complaints Policy.dc</p>	<p>This code has been adopted by MHA: "We will inform the customer in writing if their complaint falls into any of these categories and that it will not be considered further. Customers will also be given details of the Housing Ombudsman should they wish to appeal against any decisions."</p>

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section "8. What do we consider not to be a complaint?" MHA Feedback and Complaint Policy  Feedback and complaints Policy.doc	"MHA considers each complaint based on the individual circumstances"
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Section 3: Accessibility and Awareness



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<ul style="list-style-type: none"> • Equality Impact Assessment • Section “1. Introduction” • Section “4. Policy Statement” • Section “10. Equality and Diversity” • MHA Feedback and Complaints Policy <div style="text-align: center;">  Feedback and complaints Policy.doc </div> <div style="text-align: center;">  Equality Impact Assessment - Feedba </div>	<p>Section 4 of our policy states that we are happy to accept all types of feedback (including complaints, compliments, and comments) verbally, in writing, and via our social media platforms. We will tell customers how to raise concerns with us, publicising, and explaining our complaints policy and process.</p> <p>We also recognise that sometimes when making complaints customers will let us know that they are vulnerable, or that the concerns they are reporting are making them feel vulnerable. We will make sure that any requests for reasonable adjustments made during the complaints process are taken into account and appropriate action is taken.</p>
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	Section 4 Policy Statement” MHA Feedback and Complaints Policy	All MHA staff receive relevant training to deal with feedback and complaints.

			 Feedback and complaints Policy.dc  Complaints refresher training.pd  Housing Services Team Meeting Wed	
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	Section 4 Policy Statement” MHA Feedback and Complaints Policy  Feedback and complaints Policy.dc	Section 4 of our policy says that we welcome complaints, as well as compliments and comments, as an opportunity to listen to what our customers say is important to them and to improve our services.
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	Section 5 “How we will handle your complaint” MHA Feedback and Complaints Policy  Feedback and complaints Policy.dc Compliments and Complaints Manningham Housing Association Bradford	The two Stage Complaint handling procedure is highlighted within MHA’s Feedback and Complaints Policy and is also published on MHA’s website.
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	Section 1. Introduction” MHA Feedback and Complaints Policy”  Feedback and complaints Policy.dc	The policy is published on our website and is presented alongside MHA’s current Complaints Handling Code self-assessment, aligning with the latest requirements of the Housing Ombudsman.”




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	<p>Section 3. "Definitions" 4. "Policy Statement" MHA Feedback and Complaints Policy</p>  <p>Feedback and complaints Policy.doc</p>	MHA acknowledges in both sections of the Feedback and Complaints Policy that customers are given the opportunity to have a representative deal with the complaint on their behalf.
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	<p>See Policy and Customer Leaflets Compliments and Complaints Manningham Housing Association Bradford</p>  <p>Stage 1 outcome letter.pdf</p>	MHA provides details on the Housing Ombudsman service through several channels highlighted in the evidence section. We also advertise the Housing Ombudsman contact details in all MHA outcome complaint letters.




Section 4: Complaint Handling Staff




Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>Section 5. "How we will handle your complaint" MHA Feedback and Complaints Policy</p>  <p>Feedback and complaints Policy.doc</p>	MHA has adopted this code requirement. However, we refer to the "Case Handler" not the complaint officer.
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	<p>Section 5. How we will handle your complaint" " MHA Feedback and Complaints Policy</p>  <p>Feedback and complaints Policy.doc</p>	"A Team Leader or Operational Manager will be assigned as the complaint case handler and a response will be provided within the agreed periods. Case handlers will contact individuals by telephone or carry out a home visit to discuss the matters raised, if needed and they have the necessary authority and autonomy to act quickly to resolve issues effectively 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	Yes	<p>Section 5. How we will handle your complaint" Section 7. "Learning from complaints" " MHA Feedback and Complaints Policy</p>	Section 7 of our policy states that we will use complaints, compliments, and feedback as opportunities to learn and improve




	important that complaints are seen as a core service and must be resourced to handle complaints effectively		  Complaints refresher training.p Feedback and complaints Policy.dc	our services. We will use the compliments and positive feedback we receive from customers to help us understand what is important and inform future service design. We recognise that complaints form an integral part of our business service delivery. All staff are suitably trained on MHA's feedback and complaints policy and procedure.
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Section 5: The Complaint Handling Process



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Section 2. "Purpose and Aims"   Feedback and complaints Policy.dc Appendix1-Customer leaflet - F€	MHA has adopted this code requirement.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.dc	MHA has adopted this code requirement. MHA understands the key to effective complaint handling is resolving issues for customers at the earliest opportunity. Therefore, at the start of each complaint, the customer/s will be asked what resolution they would like to see implemented to resolve the situation. Wherever

				feasible MHA will make efforts to restore the customer to their position prior to them encountering the reported issue as quickly as possible.
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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	<p>MHA has adopted this code requirement.</p> <p>MHA's complaint policy only has 2 stages. If the customer is still not happy after going through both stages, they will be given details of how to contact the Housing Ombudsman Services.</p>
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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	<p>MHA has adopted this code requirement.</p> <p>MHA's complaints will not be handled by a third party, if the complaint is about a contractor, MHA will deal with this and liaise with the contractor about the issues, a decision will be made by MHA so the customer will not have to go through two complaints processes.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	All complaints are handled within MHA.

<p>5.6</p>	<p>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.</p>	<p>Yes</p>	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Stage 1 outcome letter.pdf</p> </div> <div style="text-align: center;">  <p>Feedback and complaints Policy.dc,,</p> </div> </div>	<p>Our complaints policy states that at both stages of our complaints process we will:</p> <ul style="list-style-type: none"> • Provide the customer with an opportunity to set out their concerns and outcomes being sought. • Confirm our understanding of the customer’s complaint. • Consider all relevant information and evidence in investigating the customer’s concerns. • Consider remedies at any point within the complaints process to resolve the complaint as early as possible. • Provide a complaint response to the customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.
<p>5.7</p>	<p>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.</p>	<p>Yes</p>	<p>Complaints Policy Section “8. What do we consider not to be a complaint?”</p> <div style="text-align: center;">  <p>Feedback and complaints Policy.dc</p> </div>	<p>MHA considers each complaint based on the individual circumstances. We will inform the customer in writing if their complaint falls into any of these categories and that it will not be considered further. Customers will also be given details of the Housing Ombudsman should they wish to appeal against any decisions.</p>




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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.doc</p>	<p>Section 5 of our policy states that at both stages of our complaints process we will:</p> <ul style="list-style-type: none"> • Provide the customer with an opportunity to set out their concerns. • Confirm our understanding of the customer's complaint. • Consider all relevant information and evidence in investigating the customer's concerns. • Consider remedies at any point within the complaints process to resolve the complaint as early as possible. <p>All staff are suitably trained on MHA's feedback and complaints policy and procedure.</p>
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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.doc</p>	<p>If the investigation cannot be completed within 10 working days, we will contact the complainant and agree on an extension to timescales for a response (this will be no longer than an additional 10 days, without good reason).</p>
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</p>	Yes	<p>Equality impact assessment</p>  <p>Equality Impact Assessment Form - F</p>	<p>MHA has an Equality Impact assessment which considers the customers under the different protected characteristics to ensure our policy has no negative impact on anyone.</p>




	reasonable adjustments must be kept under active review.			
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	<p>Feedback and Complaints policy Section 8 – What do we consider not to be a complaint?</p>  <p>Feedback and complaints Policy.dc</p>	There are some things we cannot deal with or escalate through our complaint procedure. We will inform the customer in writing if their complaint falls into any of these categories and that it will not be considered further.
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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	All the details of the complaints and any correspondence related to the complaint are kept in SDM on the complaint module, the module has an attachment section where all the documents are attached.
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	<p>Complaint Policy Section "6. Remedies</p>  <p>Feedback and complaints Policy.dc</p>	MHA will seek remedies to a complaint at every opportunity. We will look to be fair in our approach to put things right and will learn from the outcomes. Whilst MHA will look to provide a remedy, we will do so in accordance with guidance set by the Housing Ombudsman.
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	Yes	<p>Feedback and Complaints Policy. Section "3. Definitions-Vexatious complainant"</p>	We define a vexatious complaint as one when it becomes apparent that the complainant is displaying unacceptable behaviour, pursuing a complaint that is without merit, and intends




	putting any restrictions in place and must keep restrictions under regular review.		 Feedback and complaints Policy.dc	to cause inconvenience, harassment, or expense to MHA.
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	Feedback and Complaints Policy. Section 8 – What do we consider not to be a complaint?  Feedback and complaints Policy.dc	When making this determination we will consider a proportionate response and give regard to provisions made under the Equality Act 2010.

Section 6: Complaints Stages

Stage 1




Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Section "4. Policy Statement" Section "5 & 6. Early Resolutions & Remedies" MHA Feedback and Complaints Policy</p>  <p>Feedback and complaints Policy.dc</p>	<p>MHA's complaint handling procedure complies with codes set out by the Housing Ombudsman and our approach is set out within the Feedback and Complaints Policy.</p> <p>MHA complaint handler will undertake appropriate triaging within a common goal of resolving all complaints effectively and promptly.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	<p>MHA will aim to acknowledge all complaints within 3 working days, within the Housing ombudsman guidelines of 5 working days. We feel an early acknowledgment of a complaint will give the complaint the importance it deserves.</p>
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	<p>MHA has adopted these response times into our complaint-handling procedures as highlighted in our Policy.</p>
6.4	Landlords must decide whether an extension to this timescale is needed	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>	<p>MHA has adopted these response times into our complaint-handling</p>






	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.		 Feedback and complaints Policy.doc	procedures as highlighted in our Policy. MHA complaints policy states that we recognise that some complaints may require detailed investigations, where this is the case, we will inform the customer about the timescale in which we will respond.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.doc	If the investigation cannot be completed within 10 working days, we will contact the complainant and agree on an extension to timescales for a response (this will be no longer than an additional 10 days, without good reason). The Housing Ombudsman's contact details are provided at each stage of the complaint and when extending a complaint response.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.doc	MHA Complaints policy includes the requirement that at both stages of our complaints process, we will provide a customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.




				Actions outstanding from the complaint are tracked and delivered, with regular updates being provided to our customers.
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	 Stage 1 outcome letter.pdf	When the case manager writes to the customer, he addresses all points raised and provides clear reasons for any decision.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.dc	If further complaints are raised before an outcome has been given at Stage 1, these will be incorporated into the complaint providing there is an adequate time to investigate the new issues raised.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; 	Yes	 Stage 1 outcome letter example 2.pdf	The complaint outcome letters cover all the points as detailed in the Complaint Handling Code.

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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Stage 2



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	Complainants have the option of escalating their complaint to Stage 2 if they are not happy with the outcome at Stage 1.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	MHA Complaints policy states that when we receive a request for a complaint to progress to stage 2, we will formally acknowledge, define, and escalate the complaint within five working days of the request being received.
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	<p>Section 5 Feedback and Complaints Policy. 'How we handle your complaint'</p>  <p>Feedback and complaints Policy.dc</p>	MHA does not require customers to let us know the reasons for their escalation request, but we will let them know that this can be helpful information for the stage 2 complaint investigation process.
6.13	The person considering the complaint at stage 2 must not be the same	Yes	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'	MHA has adopted this code requirement.







	person that considered the complaint at stage 1.		 Feedback and complaints Policy.doc	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'.  Feedback and complaints Policy.doc	MHA has adopted this code requirement.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.doc	MHA has adopted this code requirement.
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	 Appendix1- Customer leaflet - F€	The Housing Ombudsman's contact details are provided at each stage of the complaint including when extending a complaint.
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	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.doc	MHA Complaints policy includes the requirement that at both stages of our complaints process, we will provide a customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed. Actions outstanding from the complaint are tracked and

				delivered, with regular updates being provided to our customers.
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	 Stage 2 - Outcome letter.pdf	When the case manager writes to the customer, he addresses all points that are raised and provides clear reasons for any decisions taken.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <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	 Stage 2 - Outcome letter example 2.pdf	The complaint outcome template letter covers all the points as detailed in the Complaint Handling Code
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 5 Feedback and Complaints Policy. 'How we handle your complaint'  Feedback and complaints Policy.doc	The panel will normally consist of two customers who are members of the Customer Experience Committee or Customer Panel and normally a member of the senior management team.






				Stage 2 complaint leads have full autonomy and authority to resolve complaints and liaise with technical leads from the business to enable them to resolve complaints.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
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	<p>Section "6. Remedies" MHA Feedback and Complaints Policy.</p>  <p>Feedback and complaints Policy.doc</p>  <p>Compensation Policy - Sept 2023 fir</p>	<p>Where MHA will look to provide a remedy, we will do so in accordance with guidance set by the Housing Ombudsman. Possible forms of remedies can include:</p> <ul style="list-style-type: none"> • An apology from MHA staff up to and including the CEO • Specific action i.e. undertaking work • Improve or review policies, procedures, or practices • Provide additional training • Financial Compensation as outlined in our MHA Compensation policy. <p>We also share the spotlight reports from the Housing Ombudsman to ensure that we consider the recommendations put forward and implement them where reasonable and practicable to do so.</p>






7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Section "6. Remedies" MHA Feedback and Complaints Policy.</p>   <p>Compensation Policy - Sept 2023 fir Feedback and Complaints Policy.dc</p>	MHA Case Managers are trained to clearly communicate remedies to customers (including timescales) and to follow up with relevant departments to ensure actions are completed.
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	<p>Section "6. Remedies" MHA Feedback and Complaints Policy.</p>   <p>Feedback and Complaints Policy.dc Compensation Policy - Sept 2023 fir</p>	MHA Case Managers are trained to clearly communicate remedies to customers (including timescales) and to follow up with relevant departments to ensure actions are completed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>Section "6. Remedies" MHA Feedback and Complaints Policy.</p>   <p>Compensation Policy - Sept 2023 fir Feedback and Complaints Policy.dc</p>	MHA has adopted HO's guidance on remedies and compensation.






Section 8: Putting things right






Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	 <p>11. Service Improvement Report</p>  <p>Winter2023_v3.indd _web- SE5.pdf</p>   <p>9. Quarter 4 H&S & 2023.12.21 - CLF TSM Key PerformancMeeting Papers.doc</p>  <p>12 Complaints and Compliments Report</p>	<p>MHA Complaints & Compliment report and the Tenant annual report in our winter Feedback magazine include the information as set out by the Housing Ombudsman Complaint Handling Code.</p> <p>We also produce other reports that capture our complaints handling and service improvement that we share with the Customer Experience Committee (CEC) which include:</p> <ul style="list-style-type: none"> • Service improvement Report. • Quarterly H&S & TSM key performance papers. • Complaints handling Forum.




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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		<p>The annual Complaints Performance and Service Improvement Report will include the information as set out by the Housing Ombudsman Complaint Handling Code.</p> <p>We will publish our Quarterly Complaints and Compliments report on our website under the complaints section.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		We will repeat the self-assessment following a significant change
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will comply with all HOS investigations, orders, and 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		If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	 How to make complaint notes.doc  11. Service Improvement Report  CLF Minutes 28.02.2023.docx  Winter2023_v3.indd _web- SE5.pdf  12 Complaints and Compliments Report	<p>Complaint Learning is built into the complaint-handling process. Complaint Handlers are trained to assess the need to “put right” any identified systemic issues or gaps in policies or processes. These learnings are shared organisation-wide with staff and customers in annual reports and changes are implemented immediately if necessary.</p> <p>The complaints Learning Forum held twice a year also reviews and scrutinises how MHA has handled complaints.</p> <p>MHA Service Improvement Group made up of operational managers analyses survey data on overall service provision.</p> <p>Patterns/Themes of complaints are identified within the group and an action plan to resolve issues is developed and implemented</p>

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	 <p>11. Service Improvement Report 12 Compliments Report</p>  <p>CLF Minutes 28.02.2023.docx</p>	<p>The complaints Learning Forum is held twice a year which reviews and scrutinises how MHA has handled complaints and recommends changes to service delivery should the need arise.</p> <p>Managers also meet up regularly as part of the Service Improvement Group to scrutinise complaints and learnings and have an action plan to improve services to our customers.</p>
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.		 <p>11. Service Improvement Report 12 Compliments Report</p>   <p>2023.12.21 - CLF Meeting Papers.doc Winter2023_v3.indd _web- SE5.pdf</p>	<ul style="list-style-type: none"> • Complaints and learning are reported in the annual report which is published in the Winter Editions of MHA's Feedback Magazine is sent to all residents • Staff have complaints learning section in their 1-1s • Complaints Learning Forum for customer scrutiny. • The Customer Experience Committee of board and tenants also scrutinises complaints learnings and outcomes.
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		<p>The Deputy CEO/Director of Operations will have lead responsibility for complaints ensuring that the board has insight into our complaints handling performance.</p>

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		The Chair of the Board's Customer Experience Committee, who is also a Board member has the lead responsibility for complaints and will act as the MRC.
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	 12 Complaints and Compliments Report	The Customer Experience Committee receives quarterly reports on MHA's complaints performance. The report is also shared with Board.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	Yes	 2023.12.21 - CLF Meeting Papers.doc  12 Complaints and Compliments Report  14. Customer Panel  9. Quarter 4 H&S & Committee Annual LTSM Key Performanc	The Deputy CEO/Director of Operations provides regular updates to the governing body through Quarterly Reports at Board meetings. Our Board receives : • Quarterly and annual performance information on complaint measures, including complaint volumes, the percentage of complaints responded to within timescale, performance against TSMs (including complaint satisfaction), learning and action plans to improve complaint handling.

	<p>d. annual complaints performance and service improvement report.</p>			<ul style="list-style-type: none"> • The quarterly Complaints & Compliments reports identify complaints referred to the HOS and case outcomes. This includes any related to severe maladministration findings recommendations of the Ombudsman and steps we will take to rectify and prevent reoccurrence, and good practice findings
<p>9.8</p>	<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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	<p>Yes</p>	<p> Complaints refresher training.pc</p> <p> Housing Services Team Meeting Wed</p> <p> Feedback and complaints Policy.dc</p>	<p>Our Approach to Learning from the Complaints framework recognises that it is important that all colleagues are aware of the complaints policy and procedure and can handle and record customer complaints.</p> <p>All customer-facing staff as well as complaint handlers regularly attend training sessions to make sure that they deal with complaints effectively and efficiently and in line with our policy and procedures.</p>