Complaints Handling – Self-Assessment 2023

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Detailed in our Complaints Policy Included in team Complaints Training GEN04 Complaints Policy – reviewed Nov 2023 Manager's refresher briefing on Complaints Handling undertaken in March 2023 Moving forwards team Complaints Training will include a blend of e-learning using the Housing Ombudsman online courses and face to face practical training sessions.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Efforts from Squared in its training and ongoing staff development to ensure the correct 'culture' in interpreting feedback from any individual or group. Also differentiating between a complaint and a

			service request (see 'Best Practice' section 1.4 below).
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	We log all complaints on our internal Complaints Log via our Housing System SDM.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	All complaints are handled in line with our Complaints Policy.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	The Complaints Policy includes a section that explains to the reader that there may be instances when a matter will not be considered under that policy. It sets out examples. It ensures however that safeguarding or health and safety issues that will have normally elapsed will continue to be considered under the policy.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	A templated letter is an appendix of our procedure. It is set out so that reasons and details can be provided to explain the decision as well as reminder that the Housing Ombudsman can be engaged if the complainant is still unhappy with the decision.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Team training covers this. Utilising the Housing Ombudsman Handling code (including the flow chart guidance) in differentiating a complaint to a service request.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Feedback will be sought by the complaint handler. Any survey response feedback is shared with the relevant Service Manager to follow up with the customer.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Customers are able to use the following to make a complaint to Squared: - Email - Telephone - In person - Via website - Via Tenant Portal - Letter - Social media

2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Squared's Complaint Policy is available via our Tenant Portal, website and on request.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	This information is available via our Tenant Portal and website and can be found in the footer section of every page of our website.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Staff are trained to identify and offer reasonable adjustments or to respond to such requests. This is reflected in our policy. Our policy was produced taking into consideration the Equality Act 2010.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Squared's Tenant Portal and website contain this information permanently. It is also detailed in our online Tenant Handbook and highlighted at customer sign up. Our policy references the Housing Ombudsman's Complaint Handling Code to assure the reader that every care has been taken to demonstrate Squared's culture of continuous improvement and compliance.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is permanently accessible via our Tenant Portal and website as well as all customer correspondence pertaining to complaints. We now also include the Ombudsman contact information more generally on communication with residents.

2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	All customer correspondence pertaining to complaints include necessary details of the Housing Ombudsman service to support our customers and staff team when handling a complaint, the Housing Ombudsman's details are included within them.
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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Social media is one of the communication channels detailed in our complaints policy and the policy describes that all complaints are confidential. Our policy includes the various platforms that complaints can be raised and also sets out that social media platforms will 'take down' posts that include confidential information. It also states that these platforms will explain that posts made outside of normal working hours may take longer for Squared to remove such posts.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Our Complaints Officer is: Claire Bryan Director
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Claire Bryan has undertaken the Housing Ombudsman e-learning training courses in 2023 and has attended a training day on "Effectively Managing Housing Complaints" in November 2023.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	 Complaint handlers should: be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	All staff are encouraged and empowered to resolve complaints at the earliest stage. In the event they are unable to resolve it with the resident, the relevant Service Manager will handle a complaint about their service supported by the Complaints Officer as necessary.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Please see complaint acknowledgement templated letter attached designed to support our team responding to a customer complaint. Complaints are logged on our Complaints Log via our Housing System, SDM. Our complaints policy and procedure ensure staff members acknowledge and log a complaint within 5 days. Staff members receive training and ongoing coaching from their line managers around complaint handling and focus on fairness, equality accessibility and clarity of communication to our customers throughout the process.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Please see acknowledgement templated letter attached. If clarification is required.we will contact the customer via their preferred method of communication.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The Service Manager will handle the complaint at stage 1 with access to all parties involved to gain a clear understanding of the complaint. At stage 2 the complaint will be handled by a more senior manager.

			At all times, whoever is investigating must remain impartial and investigate fully before reaching a conclusion.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	As above.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Customers are updated about a delay in response or for further clarity if required. All reasonable customer's requests regarding preferred method and timing of communication are taken into account.
4.12	 The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: set out their position comment on any adverse findings before a final decision is made. 	Yes	In this instance both the customer and staff member would be approached for their versions of events so that a clear picture can be obtained in order to maintain fairness.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Please see our Complaints Policy.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for	Yes	Please see our Complaints Policy.

	taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	Our Complaints Log holds all correspondence relating to a complaint with any confidential /sensitive documents held securely.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Our Tenant Handbook and Occupancy Agreements set out reasonable behaviour for our tenants and residents. Our Complaints Policy also includes a section about "unacceptable behaviour from resident and their representatives when pursuing a complaint".

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This would be explained in our response.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Complaints are handled as quickly as reasonably possible in line with our staged approach timescales.

4.5	Landlords should 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 where this is reasonable.	Yes	We accept complaints from customers representatives and are happy for a customer to be represented or accompanied at any meetings. This is included in the policy.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This would be incorporated in our response and we would, seek legal advice for clarity if necessary.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	The exception would be if the customer's complaint names a team member or contractor as part of their complaint and the complaint is about them.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We always aim to resolve a complaint in line with our staged timescales but where delay is unavoidable residents are kept updated and advised when a response can be expected.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Squared genuinely views complaints as an opportunity to learn and improve our service. Our staff are trained to recognise this. Please see feedback templated letter attached.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Team members receive any necessary support and training to handle complaints. We consider complaints as a valuable learning opportunity to enable us to improve our services to our customers.

4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Squared are proud to be accredited as Leaders in Diversity and ranked nationally among the top 100 organisations by the National Centre for Diversity. We aim to always adopt a fair approach in all situations.
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Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working</u> <u>days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Please see our Complaints Policy and acknowledgement templated letter. The actual date of the 10th working day is included.
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	We adhere to the timings within our Complaints Policy.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our best practise is to outline the complaint points raised in our responses together with our responses to each point to ensure both parties are clear and to avoid any misunderstandings.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:	Yes	This is the approach we take in our responses.

•	the complaint stage	
•	the decision on the complaint	
•	the reasons for any decisions made	
•	the details of any remedy offered to put things right	
•	details of any outstanding actions	
•	details of how to escalate the matter to stage two if the	
	resident is not satisfied with the answer	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	It is explained in our stage 1 response that a customer can escalate their complaint to stage 2 of our process if they are not satisfied with any part of our response.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Please see templated letter attached.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Please see our Complaints Policy for our stage approach definitions.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	An independent more senior manager handles a stage 2 complaint.

5.13	Landlords must respond to the stage two complaint <u>within 20</u> working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	The timescale is detailed in our acknowledgement and our Complaints Policy. The actual date of the 20th working day is included.
5.16	 Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Our responses include this information.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Our policy is two stage.
5.20	 Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: the complaint stage 	n/a	n/a

•	the complaint definition	
•	the decision on the complaint	
•	the reasons for any decisions made	
•	the details of any remedy offered to put things right	
•	details of any outstanding actions	
•	details of how to escalate the matter to the Housing	
	Ombudsman Service if the resident remains dissatisfied	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	We would contact the customer to explain the reason for the delay and agree timescales.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Customers are provided with this information at all stages.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	We would review previous complaints logged on our system and supporting documents.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	In the instance whereby the response has already been sent any additional complaint would be logged and managed separately.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	We would contact the customer to explain the reason for the delay and agree timescales.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Customers would be provided with this information at all stages of the complaint and any communications therein.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	n/a	We operate a 2 stage process. Details for the Housing Ombudsman are provided at all stages of contact.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Details for the Housing Ombudsman are provided at all stages of contact.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	We treat complaints as an invaluable learning opportunity and hold our hands up if something has gone wrong and set out our actions to put things right in our response.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	As accredited Leaders in Diversity we always aim to maintain and manage expectations and treat everyone fairly.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is the best practise we would follow in such a circumstance.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Please see our Compensation Policy attached.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	We take learnings from complaints to improve our services.

6.7	In some cases, a resident may have a legal entitlement to	Yes	We seek advice from our company
	redress. The landlord should still offer a resolution where		solicitor as necessary.
	possible, obtaining legal advice as to how any offer of resolution		
	should be worded.		

Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	We communicate complaint outcomes with relevant staff relating to any learnings or improvements. Squared's Annual Reports will include the total number of complaints for a year as well as numbers of resolutions and outcomes.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	No	Squared will in the future utilise its monthly performance reports by submitting relevant information to the executive team. Records of complaints and their outcomes are captured within this report. This information will then passed to a member of the governing board to be communicated to the wider board at regular intervals.

7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	No	As above, the monthly performance reports mentioned in 7.3 capture this information and, along with updates from the Ombudsman and other regulators and the National Housing Federation, are regularly made available to the board of management. We also use this information to inform on policy or procedure reviews as necessary. Any complaints which are referred to the Ombudsman are reported to the next board meeting.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	No	As in 7.4 above. We will analyse information and practices to inform and improve.
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	This is set out in the aims part of our Policy.

Section 8 - Self-assessment and compliance Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This action is diarised and will be carried out by the appointed complaints officer for Squared.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As in 8.1 above and ensures information such as personnel, name changes and structure changes are updated.
8.3	 Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	The appointed complaints officer will communicate the annual self- assessment and any amendments to the relevant staff member for publication on the company website, in the annual report and will be reported to the board at the first appropriate board meeting.