

Luton Community Housing Ltd (trading as Squared) Complaints Handling Code - Self-Assessment Form – June 2024

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 complaints 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 section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
1.1	Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint.	Yes	<p>At Squared we welcome feedback from our customers and see complaints as an opportunity to learn, review and inform our service delivery improvements and develop our team members.</p> <p>This is defined in section 1.1 ‘Purpose and context’ section of our Complaints Policy: GEN04 Complaints Policy.</p>

			Our Complaints Policy has been reviewed in line with the requirements and guidance of the Housing Ombudsman Complaint Handling Code.
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i></p>	Yes	<p>Detailed in our Complaints Policy under section 4.1.</p> <p>Included in Complaints Training - Relevant team members across Squared are currently undertaking the following Housing Ombudsman e-learning modules:</p> <ul style="list-style-type: none"> • Dispute Resolution • Applying Dispute Resolution Principles <p>In-house face to face training sessions on practical application of effective complaints handling at Squared to be held on 4th and 16th July 2024.</p>
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.	Partial	<p>Detailed in our Complaints Policy under 4.1</p> <p>Squared training ensures that our team members have a good level of listening skills and an understanding of interpreting feedback from any individual or group; and</p>

			<p>are able to differentiate between a complaint and a service request.</p> <p>We have experienced one case, highlighted on receipt of a Complaints Handling Failure Order dated 19th December 2023 (CHFO – Dec 23), whereby a Customer’s issues and dissatisfaction with a service was not treated as a formal complaint.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which is being rolled out on 4th July onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 1.3 of the Code by 31st August 2024.</p>
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy.	Partial	Our Complaints Policy details the difference.

	<p>A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>		<p>Service requests are recorded on our Housing Management Systems and monitored and reviewed regularly. Squared training ensures that our team members have a good level of listening skills and an understanding of interpreting feedback from any individual or group; and are able to differentiate between a complaint and a service request.</p> <p><i>See 1.3 above re non-compliant case: CHFO – Dec 23</i></p> <p>In the case of the CHFO team member/s treated an issue which constituted a complaint as a service request; as such the complaints policy was not followed.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which is being rolled out on 4th July onwards to all team members. This training will incorporate effective communication skills in gaining clarity about customer issues and dissatisfaction and recognising the difference between a service request and a complaint.</p>
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			<p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 1.4 of the Code by 31st August 2024.</p>
<p>1.5</p>	<p>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.</p>	<p>Partial</p>	<p>This is standard practice at Squared if a customer is dissatisfied with the response to their service request.</p> <p>Our Maintenance and Repairs service issue/telephone customers following works carried to provide our customers with opportunity to feedback with regards to their satisfaction level. Survey response feedback is shared with the relevant team to follow up with the customer and inform service improvements and instigate the complaints process where relevant.</p> <p><i>See 1.3 above re non-compliant case: CHFO – Dec 23</i></p> <p>In the case of the CHFO team member/s did not raise a complaint when the customer was dissatisfied with the</p>

			<p>response to their service request; as such the complaints policy was not followed. This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which is being rolled out on 4th July onwards to all team members. This training will incorporate effective communication skills in gaining clarity about customer issues and dissatisfaction and recognising the difference between a service request and a complaint.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 1.5 of the Code by 31st August 2024.</p>
<p>1.6</p>	<p>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.</p>	<p>Yes</p>	<p>Squared issues surveys on overall tenant satisfaction, repairs satisfaction and as relevant on specific topics throughout the year; and makes follow up calls where a customer has expressed dissatisfaction. Customers are reminded that a complaint may be made if they wish.</p>

Section 2 – Exclusions

Code section	Code requirement	Compliance: Yes /No / Partial	Evidence, commentary and any explanations
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Partial	<p>Our Complaints Policy sets out specific situations whereby we would not accept a complaint under section 5.7.</p> <p>The exception to this is the handling of the customer's complaint referred to within the CHFO – Dec 23, which then resulted in the formal complaints procedure being followed.</p> <p>In relation to this complaint escalated to a CHFO (Dec 23); we did not accept the customers issue as a formal complaint at first and provided reasons; however, this was overturned by the Ombudsman and the complaint process then followed upon their advice. This has been a learning for Squared, resulting in team development and service improvement - this requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which is being rolled out on 4th July onwards to all team members.</p>

			<p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 2.1 of the Code by 31st August 2024.</p>
<p>2.2</p>	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents.</p> <p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	<p>Yes</p>	<p>Our Complaints Policy has been updated April 2024 with regards to ‘acceptable exclusions’ to include issues giving rise to the complaint occurring twelve months ago (previously six).</p> <p>We have also added that ‘we may consider complaints outside this timeframe where there is good reason to do so’.</p> <p>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.</p>

<p>2.3</p>	<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>	<p>Yes</p>	<p>As per 2.2 above – our Complaints Policy timescale has been updated from six to 12 months, with discretion to consider complaints outside this timeframe where there is good reason to do so.</p>
<p>2.4</p>	<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 or 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>	<p>Yes</p>	<p>Detailed in our Complaints Policy. A templated letter is provided to our team members for use in the 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.</p>
<p>2.5</p>	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	<p>Yes</p>	<p>In line with our commitment to Fairness, Respect, Equality, Diversity, Inclusion and Engagement (FREDIE) and as an accredited Leader in Diversity we treat each customer and their complaint fairly considering individual circumstances.</p>

Section 3 - Accessibility and awareness

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
3.1	<p>Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.</p> <p>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.</p>	Yes	<p>In line with our commitment to Fairness, Respect, Equality, Diversity, Inclusion and Engagement (FREDIE) and as an accredited Leader in Diversity we treat each customer fairly and consider the needs and reasonable adjustments of customers who may need to access the complaints procedure.</p> <p>Customers are able to use the following to make a complaint to Squared:</p> <ul style="list-style-type: none"> - Email - Telephone - In person - Via website - Via Tenant Portal - Letter - Social media - via a representative or third party
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	<p>At Squared we welcome complaints to ensure customer satisfaction and inform service improvements. A customer may wish to make a complaint in any way and with any member of our team.</p> <p>Our team members across Squared received training on effective handling of</p>

			complaints and are able to pass details of a complaint received to the appropriate colleague within the organisation.
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	At Squared any number of complaints are welcomed. Customer voice is encouraged. Planning forward communications will be reviewed and enhanced where relevant with regards to complaints and performance reporting to our customers to ensure transparency.
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	Squared's Complaint Policy is available via our Tenant Portal, website and on request. Our Squared website/Tenant Portal has 'Recite Me' accessibility software linked which allows customers to translate information. Our policy details the two-stage process, to manages the expectations of our customers with regards to what will happen at each stage and details our response timeframes.
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	Detailed in our Complaints Policy. Our Complaints Policy includes details of how the customer can view it. This

			<p>information is available via our Tenant Portal and website and can be found in the footer section of every page of our website, and in hard copy format.</p> <p>The policy has been updated to include information about the Ombudsman and the Code.</p>
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>Team members are trained to identify and offer reasonable adjustments or to respond to such requests.</p> <p>This is reflected in our policy. Our policy was produced taking into consideration the Equality Act 2010.</p>
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>Squared's Tenant Portal and website contain this information permanently.</p> <p>It is also detailed in our online Tenant Handbook and highlighted at customer sign up.</p> <p>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.</p>

Section 4 - Complaint handling personnel

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Our Complaints Officer is: Claire Bryan – Business Support & Governance Director This team member ensures effective management of complaints and liaison with the Ombudsman across Squared and reports to the Board of Management, liaising with the governing Member Responsible for Complaints (the MRC).
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	Claire Bryan sits on the Executive Leadership Team with access to all managers and team members across Squared; with the authority and autonomy to act to resolve disputes promptly and fairly; presenting complaints reporting to the Board.
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	Claire Bryan has undertaken the Housing Ombudsman e-learning training courses on Dispute Resolution and Applying Dispute Resolution Principles in 2023 and has attended a training day on “Effectively Managing Housing Complaints” in November 2023.

			<p>Relevant team members across Squared are currently undertaking the following Housing Ombudsman e-learning modules:</p> <ul style="list-style-type: none">• Dispute Resolution;• Applying Dispute Resolution Principles. <p>In-house face to face training sessions on practical application of effective complaints handling at Squared to be held on 4th and 16th July 2024.</p> <p>Team members have access to learning resources on the HQN website and Squared is a member of benchmarking groups.</p> <p>All team members are encouraged and empowered to resolve complaints at the earliest stage. In the event they are unable to resolve it with the customer, the relevant Service Manager will handle a complaint about their service supported by the Complaints Officer as necessary.</p>
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Section 5 – The Complaint Handling Process

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<p>Our GEN 04 Complaints Policy is in place for dealing with complaints covered by the Housing Ombudsman Complaints Handling Code, which reflects the requirements and best practice guidance provided.</p> <p>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.</p> <p>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.</p>
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	Yes	Complaints are handled as quickly as reasonably possible in line with our staged approach timescales.

	<p>stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.</p>		<p>If clarification is required we will contact the customer via their preferred method of communication.</p> <p>Complaints are logged on our Complaints Log via our Housing System, SDM.</p> <p>Our complaints policy and procedure ensure team members acknowledge and log a complaint within 5 days of receipt.</p> <p>There are only two stages to our complaints procedure.</p> <p>Team members receive training and ongoing coaching from the People Excellence team, the Complaints Officer and their line managers around complaint handling and focus on fairness, equality accessibility and clarity of communication to our customers throughout the process.</p> <p>Our Complaints Log holds all correspondence relating to a complaint with any confidential /sensitive documents held securely.</p>
<p>5.3</p>	<p>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.</p>	<p>Yes</p>	<p>Our Complaints Policy has only two stages.</p>

<p>5.4</p>	<p>Where a landlord’s complaint response is handled by a third party (for example a contractor or independent adjudicator) at any stage, it must form part of the 2 stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.</p>	<p>Yes</p>	<p>Our Complaints Policy has only two stages. No third parties have handled customer complaints in 2023-24.</p>
<p>5.5</p>	<p>Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.</p>	<p>Yes</p>	<p>In the future should any third parties handle complaints we will ensure these are handled in accordance with the Code.</p>
<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>We log complaints on our internal Complaints Log via our Housing System SDM. 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 is trained to remain impartial and investigate fully before reaching a conclusion. Our template acknowledgement letter and stage 1 and 2 response letters provide ensure the ‘complaint definition’ is covered.</p>
<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>As above.</p>

<p>5.8</p>	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> 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 	<p>Yes</p>	<p>As above.</p> <p>All relevant members of the team at Squared are trained, or are undergoing training, in the effective handling/ management of complaints.</p>
<p>5.9</p>	<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>	<p>Partial</p>	<p>A discussion or email exchange is undertaken with our customers should it be deemed that a response will fall outside of a timescale as set out in the Code and our Complaints Policy, to agree an extension and keep the customer informed on progress.</p> <p>However, during 2023-24 we have experienced that an extension is not always discussed with the customer and recorded formally, with suitable intervals for keeping them informed agreed.</p> <p>This has been a learning for Squared, resulting in team development and service improvement - this requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which is being rolled</p>

			<p>out on 4th July onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 5.9 of the Code by 31st August 2024.</p>
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.</p> <p>Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<p>Protected characteristics of our customers are securely recorded on our Housing Management System and these will be referred to during the handling of complaints to ensure reasonable adjustments are made where appropriate. These will be recorded.</p>
5.11	<p>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.</p>	Partial	<p>In relation to the complaint escalated to a CHFO (Dec 23); we did not accept the customers issue as a formal complaint at first and provided reasons; however this was overturned by the Ombudsman and the complaint process then followed upon their advice.</p> <p>This has been a learning for Squared, resulting in team development and service improvement - this requirement of the Code is now incorporated into our</p>

			<p>mandatory in-house Complaints Handling training programme which is being rolled out on 4th July onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 5.11 of the Code by 31st August 2024.</p>
<p>5.12</p>	<p>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.</p>	<p>Yes</p>	<p>We log complaints on our internal Complaints Log via our Housing System SDM with supporting documentation.</p> <p>On the monitoring of complaints, we found that the complaint (CHFO – Dec 23), referred to in 1.3 above had not been logged in accordance with our processes onto our SDM Housing Management System. This has since been rectified and training provided to the team members and we are now fully compliant with requirement 5.12 of the Code.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house</p>

			<p>Complaints Handling training programme which is being rolled out on 4th July onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>Our complaints management module of our current Housing Management System has been reviewed in line with the forthcoming implementation of new IT software, and the new complaints system scoped to ensure our record-keeping and reporting tools are improved.</p>
5.13	Landlords must have processes in place to ensure that a complaint can be remedied at any stage of its complaints process. Landlords must ensure that appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<p>We actively encourage early and effective complaints resolution to complaints aiming 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.</p> <p>A Compensation Policy is available.</p>
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	<p>Our Tenant Handbook and Occupancy Agreements set out reasonable behaviour for our customers.</p> <p>Our Complaints Policy also includes a section about “unacceptable behaviour</p>

			from resident and their representatives when pursuing a complaint”.
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	Consideration regarding restrictions on contact due to unacceptable behaviour would be proportionate and demonstrate regard for the provisions of the Equality Act 2010 should the need arise for managing unacceptable behaviour resulting in restrictions being put in place.

Section 6 - Complaint stages (1 and 2)

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
STAGE 1			
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>Our training for team members encourages urgency and early resolution of complaints where possible, including engaging in dialogue with the customer at an early stage to clarify the details and required outcome and answering a complaint along with the acknowledgment where appropriate.</p> <p>During 2023-24 very few stage one complaints escalated to stage two.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Yes	We adhere to these timings within our Complaints Policy.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Partial	<p>We adhere to these timings unless an extension has been agreed with the customer.</p> <p>However, with regards to the handling of the complaint which we received the CHFO (Dec – 23) for, referred to in 1.3 above, our processes and timescales</p>

			<p>were not followed in accordance with the Code.</p> <p>E-learning has now been provided to ensure this approach is not repeated, and is included in our in-house training programme being rolled out in July 2024. An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.3 of the Code by 31st August 2024.</p> <p>Moving forwards the complaints management module in the forthcoming implementation of new IT software, has been scoped to enable improved work flows to support team members in adhering to timescales of the Code.</p>
<p>6.4</p>	<p>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.</p>	<p>Partial</p>	<p>We adhere to this approach ensuring that extensions/timings are formally documented and the customer informed.</p> <p>However, with regards to the handling of the complaint which we received the</p>

			<p>CHFO (Dec – 23) for, referred to in 1.3 above, this approach was not followed in accordance with the Code.</p> <p>E-learning has now been provided to ensure this approach is not repeated, and is included in our in-house training programme being rolled out in July 2024.</p> <p>An Effective Complaints Handling Toolkit will be developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.4 of the Code by 31st August 2024.</p>
<p>6.5</p>	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	<p>No</p>	<p>It had been identified that this does not always happen consistently, therefore our Complaints Policy has now been amended to say we will provide the Ombudsman’s contact details.</p> <p>This requirement is also included in our in-house training programme being rolled out in July 2024 and the Effective Complaints Handling Toolkit being</p>

			<p>developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.5 of the Code by 31st August 2024.</p>
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	<p>Our responses to complaints are provided on conclusion of the investigation, when the informed decision regarding the complaint is made. Any actions required to address the issue are then recorded, planned and monitored. Outstanding actions are tracked on our Housing Management system.</p>
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.	Partial	<p>This is normal practice at Squared for all complaints received.</p> <p>However, with regards to the handling of the complaint which we received the CHFO (Dec – 23) for, referred to in 1.3 above, this approach was not followed in accordance with the Code.</p> <p>Training has now been provided to ensure this approach is not repeated, and is included in our in-house training programme being rolled out in July 2024, and the Effective Complaints Handling</p>

			<p>Toolkit being developed to provide guidance to our team members.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.7 of the Code by 31st August 2024.</p>
6.8	<p>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.</p>	Yes	<p>This is normal practice at Squared for all complaints received, and is included in the in-house training on effective complaints handling for our team members.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> e. the complaint stage f. the complaint definition g. the decision on the complaint h. the reasons for any decisions made i. the details of any remedy offered to put things right j. details of any outstanding actions k. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response 	Partial	<p>This is normal practice at Squared for all complaints received. Response letters are documented and filed on our SDM Housing Management System.</p> <p>However, with regards to the handling of the complaint which we received the CHFO (Dec – 23) for, referred to in 1.3 above, this approach was not followed in accordance with the Code. Training has now been provided to ensure this approach is not repeated, and is included in our in-house training</p>

			<p>programme being rolled out in July 2024, and the Effective Complaints Handling Toolkit being developed to provide guidance to our team members, which will include template response letters to provide a framework for complaint handlers to follow and bespoke their response, ensuring the requirements of 6.9 of the Code are adhered to.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.9 of the Code by 31st August 2024.</p>
STAGE 2			
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	This is the approach taken at Squared and detailed in our Complaints Policy.
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	Complaints policy amended 2024 to make this timescale more explicit. This is the approach taken at Squared and all records and documentation is recorded and monitored.

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	Complaints Policy amended to remove the requirement for the complainant to confirm the reason for escalating the complaint. This requirement is also included in our in-house training programme being rolled out in July 2024
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	A more senior manager always considers complaints escalated to Stage 2, as detailed in our Complaints Policy.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints policy amended 2024 to make this timescale more explicit. This is the approach taken at Squared and all records and documentation is recorded and monitored.
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	When an extension is agreed at stage 2 this is documented formally with the agreement of the customer.
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.	No	Our Complaints Policy has now been amended to say we will provide the Ombudsman's contact details. This requirement is also included in our in-house training programme being rolled out in July 2024.

			<p>However, with regards to the handling of the complaint which we received the CHFO (Dec – 23) for, referred to in 1.3 above, this approach was not followed in accordance with the Code.</p> <p>Training has now been provided to ensure this approach is not repeated, and is included in our in-house training programme being rolled out in July 2024, and the Effective Complaints Handling Toolkit being developed to provide guidance to our team members, which will include template response letters to provide a framework for complaint handlers to follow and bespoke their response, ensuring the requirements of 6.16 of the Code are adhered to.</p> <p>We expect all our team members to have a shared understanding of the effective handling of complaints and the Complaints Handling Code and for Squared to be fully compliant against requirement 6.16 of the Code by 31st August 2024.</p>
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	Our response to complaints at stage 2 is provided when the informed decision regarding the complaint is made. Any actions required to address the issue are then recorded, planned and monitored.

			Outstanding actions are tracked on our Housing Management system.
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	This is the approach taken in response to stage 2 complaints.
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"> • 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 • details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	This is the approach taken in response to stage 2 complaints. All records and documentation are logged on the SDM Housing Management System.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	A more senior manager leads on stage 2 complaints and responses will involve collaborative working with those relevant team members required to provide the information required to inform a considered response.

Section 7 - Putting things right

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
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.</p> <p>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>We treat complaints as an invaluable learning opportunity and are transparent, acknowledging our service failings if something has gone wrong.</p> <p>We will set out our actions to put things right in our response to the customer.</p> <p>Our complaint records held on the SDM Housing Management System provide examples of where we have apologised, explained, are taken action, or made service improvements of changes to policies and procedures and/or made compensation payments.</p> <p>We have a Compensation Policy.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>As accredited Leaders in Diversity we always aim to maintain and manage expectations and treat everyone fairly.</p> <p>Remedies are considered carefully and clear guidelines are set out in the Compensation Policy</p>

7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is the best practise we would follow in such a circumstance. We also seek advice from our company solicitor as necessary.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Guidelines are set out in the Compensation Policy

Section 8 – Self-assessment, reporting and compliance

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements 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 any findings of non-compliance with this Code by the Ombudsman the service improvements made as a result of the learning from complaints any annual report about the landlord's performance from the Ombudsman any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord 	Yes	<p>The Squared Self-assessment against the Housing Ombudsman Complaints Handling Code is produced on an annual basis and published on the Squared website, with the Annual Complaints Performance and Service Improvement Report which contains data on complaints, our learnings and actions for improvement. The report also details the Complaint Handling Failure Order issued in December 2023; a 'determination' letter was received however Squared are yet to receive an investigation report on the matter.</p>
8.2	<p>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.</p>	Yes	<p>The Annual Complaints Performance and Service Report and the Self-assessment have been reported to the Board Member Responsible for Complaints for their scrutiny, challenge and response.</p> <p>The MRC's response forms the Board of Management's (Governors) response</p>

			and is provided in the submission and published on the Squared website alongside the report. These reports will be presented to the full Board of Management at the Board Meeting in July 2024 to be ratified.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This has not been needed to date. However a review has been undertaken to ensure information such as the names of the Complaints Officer and governing Member Responsible for Complaints (MRC) are correct.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Squared has not been asked to do this by the Housing Ombudsman to date. If required, we would comply with this and further review our Self-assessment.
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	As per 8.2: The Annual Complaints Performance and Service Report and the Self-assessment have been reported to the Board Member Responsible for Complaints for their scrutiny, challenge and response. The MRC's response forms the Board of Management's (Governors) response and is provided in the submission and published on the Squared website alongside the report. These reports will be presented to the full Board of Management at the Board Meeting in July 2024 to be ratified.

Section 9 – Scrutiny & oversight: continuous learning and improvement

Code section	Code requirement	Compliance: Yes / No / Partial	Evidence, commentary and any explanations
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>A debrief meeting is held at both stages 1 and 2 with the relevant team members involved to review learnings from the complaint, to inform service improvements, including team development.</p> <p>Whilst we hold debriefs and use learnings to inform service improvements, we have identified that a more robust framework is needed to be developed to capture/record and monitor the learning from complaints.</p> <p>Complaints, data and outcomes are discussed in team meetings, operational management meetings and leadership team meetings.</p> <p>Squared's Annual Reports include the total number of complaints for a year as well as numbers of resolutions and outcomes.</p> <p>Complaint handling feedback from the TSM survey and Maintenance & Repairs post-work surveys/calls are also used to inform changes in service delivery.</p>

			<p>Relevant team members across Squared are currently undertaking the following training - Housing Ombudsman e-learning modules:</p> <ul style="list-style-type: none"> • Dispute Resolution; • Applying Dispute Resolution Principles. <p>In-house face to face training sessions on practical application of effective complaints handling at Squared to be held on 4th and 16th July 2024.</p>
<p>9.2</p>	<p>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.</p>	<p>Yes</p>	<p>As for 9.1 above.</p> <p>In addition, this approach is clear in our Complaints Policy and training/guidance to team members.</p> <p>The Property Service department monitor customer feedback/dissatisfaction analysis reports. Causes of dissatisfaction are identified and the information is taken to contractor meetings to work on improvements to service delivery.</p> <p>We communicate complaint outcomes with relevant team members relating to any learnings or improvements.</p>

			A positive complaints culture will be further strengthened through development of a guidance toolkit for team members on effective complaints handling.
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	<p>As per 9.1 and 9.2 above.</p> <p>Our Star Survey report provides our TSM data, analysis, and recommendations for service improvement considerations. We are currently collating our TSM learning outcomes and improvements action plan, to be published and shared with our customers, and other stakeholders on our website and Tenant Portal.</p> <p>Complaints analysis reports are shared with the Board of Management on a quarterly basis.</p> <p>Squared's Annual Reports include the total number of complaints for a year as well as numbers of resolutions and outcomes. We have identified that to enhance our accountability and transparency further our learning and improvements from complaints will be published in readily accessible format on a more regular basis to our stakeholders.</p>

<p>9.4</p>	<p>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.</p>	<p>Yes</p>	<p>The Business Support & Governance Director is the responsible Director for complaint handling.</p> <p>We analyse information and practices to inform and improve our service delivery and monitor and control potential risks, reporting any serious risks arising from complaints to the MRC and Board of Management.</p> <p>Complaints analysis reports are shared with the Board of Management on a quarterly basis.</p>
<p>9.5</p>	<p>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').</p>	<p>Yes</p>	<p>Our Member Responsible for Complaints is Jo Simcox, who sits on the Board of Management with full voting rights.</p>
<p>9.6</p>	<p>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.</p>	<p>Yes</p>	<p>The MRC receives quarterly reports on complaints performance, which are also presented with and discussed at the full Board of Management meetings.</p> <p>The MRC also provides the governing body response to this annual Self-assessment.</p>

<p>9.7</p>	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> • regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance • regular reviews of issues and trends arising from complaint handling • regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings • annual complaints performance and service improvement report 	<p>Yes</p>	<p>The papers and reports provided to the MRC and Board of Management cover the requirements of the Code.</p> <p>Updates to the Complaints Policy are also presented at the next full Board of Management meeting.</p>
<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> <ol style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others c. act within the professional standards for engaging with complaints as set by any relevant professional body 	<p>Yes</p>	<p>These requirements are covered in team member training programmes.</p> <p>Squared also has a behaviour framework linked to Squared’s values, which includes expected behaviours which link to effective complaints handling.</p>