

Complaint Handling Code Self-Assessment: One Manchester 2022

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: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	See One Manchester Complaints Policy
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	
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	
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	

<p>1.8</p>	<p>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.</p>	<p>Yes</p>	<p>Evidence relied upon: The exclusions are considered reasonable and fair e.g. matters outside of our control; issues subject to legal proceedings; complaints being pursued unreasonably; that relate to matters over six months old although discretion can be applied.</p> <p>Exclusions as set out in the Complaints Policy are:</p> <ul style="list-style-type: none"> • An initial request for service, information or an explanation of how a decision has been made or where customer is telling us about a problem for the very first time (unless that relates to staff behaviour) • Anti-social behaviour unless the complaint refers to our failure to deal with the matter appropriately • Disputes against the amount of rent or service charge being charged • A claim for damages or personal injury which will be dealt with as an insurance claim • Matters where legal proceedings have been started or concluded • Matters relating solely to services or decisions outside of our control • Attempts to reopen or reconsider complaints where we have provided our final decision • Demoted tenancy appeals • Where we have special arrangements in place with a customer, in line with our Unacceptable Actions and Behaviour Policy • Complaints which are being pursued in an unreasonable manner including frivolous or vexatious complaints • Temporary business or service closures/outages (including digital services) due to unforeseen circumstances or logistical reasons or any other force majeure event that impacts service delivery • Where the issue took place more than six months ago (however discretion can be applied where there is a valid reason for the delay)
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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	The Complaints team take responsibility for this.
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Best practice 'should' requirements

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	Customer facing teams have been trained on how to recognise the difference between a complaint and 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	Complaint surveys are undertaken by an impartial third party. Customers wishing to make a complaint via this process are signposted back to One Manchester.

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	As we want our complaints process to be easy and accessible, complaints can be made in any way (e.g. social media/email/text/telephone/in person/in writing and through a representative or advocate where consent has been provided).
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	
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	There is an easy to find standalone complaints page on the website which includes all relevant information.
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	One Manchester has a Reasonable Adjustments Policy. Examples include: <ul style="list-style-type: none"> • The provision of auxiliary aids • The provision of information in appropriate alternative formats e.g. large print, Braille, coloured paper • The reasonable extension of time limits e.g. to request the escalation of a complaint • The provision of correspondence in a larger font size • The use of email or the telephone in preference to hard copy letters where appropriate which may assist those with a visual impairment • Speaking clearly to our customers with the offer of additional time to cover the issues they need to discuss • Using plain English appropriate to the person we are dealing with and avoiding jargon

			<ul style="list-style-type: none"> • Arranging meetings in rooms that have appropriate facilities • Rest and comfort breaks in meetings • Communicating with people through their representative if requested and approved by them • Arranging home visits for those who have particular mobility difficulties • Communicating with people through their representative (whether or not this is a legal representative) or advocate, if requested and approved by them
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	Our complaints policy including the process is available on our website and we will include details of the process in our annual report. Dissatisfied customers are advised of the process on calls, via email exchange, web chat or direct messages on social media and in complaint responses.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Standard letterhead includes the link to the complaints page on the website which includes Ombudsman information. This is also provided in documents such as the Annual Report.
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	The stage one and stage two formal response letters include this advice as well as the complaint withdrawal letter. In addition, The Customer Service and Complaints teams also know to provide Ombudsman details at various touchpoints.

Best practice 'should' requirements

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.	Part	The complaints policy doesn't explicitly detail the process when someone complains via social media, however there is a process in place for these to be highlighted, logged and responded to.

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	Managers are responsible for investigating and responding to complaints within their service area. They are supported by a central team who investigate and respond to some complaints. This team logs, monitors, advises, quality assures all formal complaint responses and considers 2nd stage review requests. They also maintain and monitor a complaints action log.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All complaint responses are reviewed by the Complaints Team before sending to ensure they are appropriate and fair.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • 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	The Customer Service Team and complaint handlers have received appropriate training.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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.</p>	Yes	One Manchester acknowledges complaints in two working days and has a two stage 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.	Part	Because of the impact on resource, the acknowledgement letter is by necessity an automated template letter. However, there is an expectation for all complaints managers to ring and/or visit the customer to clarify all details upon receipt of the complaint.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	
4.7	The complaint handler must: <ul style="list-style-type: none"> • 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	
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	
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: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	The policy and process includes this requirement: “This includes providing the complainant with an opportunity to comment on any adverse findings before a final decision is made”.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is set at one month from the date of the stage one response, but is not a strict rule.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	

	procedure and must have clear and valid reasons for 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	The case management tool within the housing management application is used for all complaints which means all key information is held centrally.
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	There is an Unacceptable Actions and Behaviour Policy available on the website.

Best practice 'should' requirements

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	
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	Managers are encouraged to try to resolve complaints as quickly as possible and reduce the need for a long drawn out process
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	
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	

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	The policy and process includes this requirement: “This [complaint] investigation should include contact with the complainant (e.g. by telephone/email or face to face) as a matter of course.” Furthermore “...we will always keep complainants informed of any delays and advise them 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	A monthly complaints handling survey is carried out on One Manchester’s behalf by an independent third party.
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	By having managers across the business deal with complaints, we believe this encourages better engagement with the process and helps us learn from mistakes.
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	

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working 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.	Part	Our performance on this metric in 2022 has been poor. Some stage one complaints have been kept open for a long time as resolutions have been sought. Others have simply been responded to late. Actions have been taken to remedy this and performance has improved towards the end of the current year.
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.	Part	Refresher training has recently been carried out for complaints handlers to reiterate this point. Many complaints responded to in 2022 fall into this category, a handful of which have been customer driven. See above comment also.
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	
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • 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 	Yes	A standard template letter is used with all of this information either included or prompted to include

Stage 2

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	The Complaints team handle all complaint escalation requests and deal with them in line with our policy and the Code.
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	This happens as standard when a complaint is escalated to help the person conducting the stage two review to understand what outcome is being sought.
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	

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is written into our Complaints Policy.
5.13	Landlords must respond to the stage two complaint within 20 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	Some stage two complaints have been kept open for longer as resolutions have been sought. We are following this closely.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two 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 <ul style="list-style-type: none"> • 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	A template letter is used for stage two responses which includes Housing Ombudsman contact information.

Stage 3

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	One Manchester has a two stage complaints process.

5.20	Landlords must confirm the following in writing to the resident at the completion of stage three 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/a	
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Best practice 'should' requirements

Stage 1

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	Our performance on this metric in 2022 has been poor. Some stage one complaints have been kept open for a long time as resolutions have been sought. Others have simply been responded to late. Actions have been taken to remedy this and performance has improved towards the end of the current year.
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	Our acknowledgement and extension letters include the Housing Ombudsman's contact information for this purpose.
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 encourage all complaint handlers to always look beyond the specific complaint in case of recurring issues.

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	Our performance on this metric in 2022 has been poor. Some stage one complaints have been kept open for a long time as resolutions have been sought. Others have simply been responded to late. Actions have been taken to remedy this and performance has improved towards the end of the current year.
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	Our acknowledgement and extension letters include the Housing Ombudsman's contact information for this purpose.

Stage 3

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 within 20 working days 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	
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.	N/a	

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	The policy and process includes a remedies section which should be appropriately applied. We maintain a complaints action log to record and track remedial actions.
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	
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	See above comment about actions log which helps compliance here.
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	One Manchester has a Compensation Policy available on the website to aid decision making.

Best practice 'should' requirements

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	Wherever possible, learnings are captured and changes made to processes as a result of complaints.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	

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	The experience team conducts deep dives into the causes of complaints. Customer journey maps are carried out to understand the impact on the people making the complaint. Themes and action taken is published in our Annual Report and on our website on the 'complaints performance' page – link: https://www.onemanchester.co.uk/who-we-are/how-we-are-doing/complaints-performance . Small incremental changes are made as we learn from complaints, a 'lessons learnt' section is included in complaint responses, and longer term projects are being undertaken to address the bigger issues identified.

Best practice 'should' requirements

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.	Yes	Chair of Place Committee
	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders 	Yes	Weekly and monthly reports are shared with the Senior and Exec Management teams. Quarterly and annual reports are shared with Place Committee and Board.

7.4	<ul style="list-style-type: none"> • 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. 		All Ombudsman determinations are shared with the Senior and Exec Leadership teams upon receipt. Customer journey maps and other key learnings are regularly shared with senior management. Action plans are agreed with senior managers and monitored through to completion.
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.	Yes	All customer journey maps and analysis are shared with senior management and their input is sought on improvements.
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • 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 being introduced across the organisation for existing roles and is included in all new role profiles.

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	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> 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	