#### **APPENDIX A**

#### **Appendix A: Self-assessment form**

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual 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 requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	N/A	N/A	Response not required as not part of the self-assessment process. Included for completeness.
	A complaint must be defined as:			
1.2	'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	YES	Policy document: Compliments, Comments and Complaints. A copy of the policy can be found here. (Section 4.2)	The definition is set out in our Policy and is: "An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by St Leger Homes, its own staff, or those acting on its behalf, affecting an individual resident or group of residents"
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 4.3)	The definition we include in our policy states that a complaint is defined as "an expression of dissatisfaction". We accept and log complaints that don't use the word 'complaint' and accept complaints from third parties or representatives acting on behalf of tenants. Examples include, complaints received via Councillors and MPs. Staff have been advised via our Executive Management Team key messages and our Internal Complaint Charter, what constitutes a complaint. Our policy states that the word complaint does not have be used and that we accept complaints from third party or representatives in line with our policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Sections 4.2 and 4.4);  Internal Complaints	The definition of what is regarded as a complaint is set out in our Policy. "An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by St Leger Homes, its own staff, or those acting on its behalf, affecting an individual resident or group of residents." We do not log requests for service as complaints, but we do record and monitor these using our housing CRM system. These monitored and actioned by the relevant teams. Our CRM system is a single system used across the organisation which captures all customer interactions,

			Charter	recording the date the interaction was received and when, if action is required, it closed. We use the Housing Ombudsman's Service Request v Complaint Flow Chart as guidance to distinguish requests from complaints. Our process includes a checking mechanism by the Customer Relations team who co-ordinate and respond to complaints and who review any logged complaint as part of the acknowledgment process which includes what the complaint is about and the outcome the complainant is looking for.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 4.2)  Stage 1 and Stage 2 investigation procedures.	As above. Our policy defines what we treat as a complaint as set out in 1.2 above. Our procedures sets out that we continue to address service requests regardless of whether or not a customer has made a complaint.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 4.6)  Emails to Viewpoint and Voicescape.	When we undertake our TSM and Transactional Surveys we advise tenants that if they have expressed dissatisfaction, they can access our complaints procedure and provide information about the access channels they can use to do this.

**Section 2: Exclusions** 

2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Sections 4.6 and 4.7)	<ul> <li>The policy sets out the reasons where we would not accept a complaint as follows:</li> <li>the general law, unless wrongly applied;</li> <li>requests for new services;</li> <li>persons or bodies over which SLHD has no control;</li> <li>Where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and the Particulars of Claim, having been filed at court;</li> <li>the subject of the complaint occurred, or the complainant became aware of the issue more than 12 months ago and/or is already subject to an ongoing or resolved complaint. We will consider whether to apply discretion to accept complaints outside of this time lime where there are good reasons to do so.</li> <li>matters that have already been considered under the complaints policy;</li> <li>expressions of dissatisfaction made through a survey. We will, however, provide details of how a customer can complain.</li> </ul>
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:  The issue giving rise to the complaint occurred over twelve months ago.  Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 4.6)	As set out in our policy and shown at 2.1 above. The general law is where we have a legal duty to carry out work, such as a gas inspection, unless the complaint meets the definitions in 4.3 of our Complaints Policy.

	Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are 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.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Sections 4.6 and 4.7)	We will only not accept a complaint for the reasons set out at 2.1 above.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 4.7)	This rarely happens. We would not accept a complaint only if it fell in line with any of the exclusions listed in the complaints policy and advised at 2.1 above. Should this occur we would explain the reasons for not accepting the complaints and advise the complainant of the right to take our decision to the Ombudsman. to the complainant and we explain the Ombudsman's process at this time. Our policy states: "Where a decision has been made 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."
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here.(Section 4.7)	When considering whether to exclude a complaint from our process we would consider the exclusions shown in our policy, we would also consider the circumstances of the complaint, any vulnerabilities which may have impacted and whether any reasonable adjustments should be considered and take into account our Vulnerable Persons Policy.

**Section 3: Accessibility and Awareness** 

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	YES	The different access channels the customer can use to make a complaint are set out in our Policy document: Compliments, Comments and Complaints. A copy of the policy can be found here.  (Section 5.1 and sections 6.1, 6.2, 6.3 and 6.4)  The Fairness and Equality Statement can be found here.  The Equality and Diversity Policy can be found here.	We have multiple routes available to make a complaint to ensure that our process is accessible and so that customers are given a choice. This includes online, via our website, social media platforms, face to face, over the telephone, email, and in writing. We publish how to complaint on our web, in our HouseProud magazine, on leaflets and on posters.  Our policy includes provision for reasonable adjustments. We provide mandatory training on equality and diversity for all employees, including complaint handlers. The complaints policy includes the following statement: "All St Leger Homes staff are trained in equality and diversity to embed understanding about where they may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. This is mandatory training, the compliance of which is monitored by our Organisational Development team."  Our Fairness and Equality Statement 2022 – 2026 sets out that "We are committed to understanding more about the needs of our customers. Collecting, storing and using customer information appropriately enables us to tailor our services to meet their needs."  In line with our Equality and Diversity Statement and commitments, we will support the needs of our diverse customers by adapting policies and associated procedures to accommodate an individual's needs where needed. This includes taking into account the customer's need and where appropriate changing work practices, for example providing correspondence on coloured paper where requested. A full copy of the Fairness and Equality Statement can be found at www.stlegerhomes.co.uk.

				Our Equality and Diversity Policy sets out that we will ensure we take into account the sensitivities and needs of different groups, including in relation to the equality strands, social and cultural and religious needs and residents with additional support needs.
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	Open Housing System – Logging of complaints using Customer Contact  Complaints Procedures; Compliments, Comments and Complaints Policy published on the Internal Intranet; Training for all Service Investigating Officers; Internal Complaints Charter	Our complaints process is that any employee is able to raise a complaint as all customer interaction is logged on our CRM system. Workflow is built into the system to deal with complaints and to ensure they are automatically routed to a Customer Relations Team who process all complaints received. Our complaints processes are publicised on our Internal Intranet System. We have an internal complaints charter video that sets out how to handle complaints. This has been publicised across 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	Customer and Performance Committee Minutes;  The published information to the Customer and Performance Committee and the City of Doncaster Council's Overview and Scrutiny Management on the number of complaints can be found here. The latest report to CDC Cabinet on complaints can be found at St Leger Homes Performance Report 202425 Quarter 3 Cabinet Report.pdf	We report the number of complaints we receive on a regular basis to our Executive Management Team, Our Customer and Performance Committee and the City of Doncaster Council's Overview and Scrutiny Management Committee. Complaint numbers and how we are performing against key performance indicators are also reported quarterly to the City of Doncaster Council's Cabinet meetings. We advise that whilst we are working to reduce the number of complaints received, we do not see high volumes as negative. We also publish information on the number of complaints received on our website.
3.4	Landlords must make their complaint policy available in a clear and accessible format for	YES	Policy document: Compliments, Comments	A copy of our Complaints Policy is published on our website. The City of Doncaster Council also has a link to our Policy

	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.		and Complaints . A copy of the policy can be found here. (Sections 7.1 to 7.22)  Complaints Poster;	on their website. The website uses Reach-deck which means that the policy can be translated into different languages or read aloud for those sight impaired. The policy details our 2 Stage complaints process and sets out what will happen at each stage and by when. We also have a number of posters and leaflets that are available across a
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	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 12.1 – 12.3)	number of sites setting out the same information.  The Policy document states: "We will publicise details of this policy, including information about the Ombudsman and the Housing Ombudsman's Complaints Code on our website at www.stlegerhomes.co.uk. The same information will also be publicised in our HouseProud magazine on a yearly basis and will be advertised at our main reception."
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	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 5.2)	Our Policy states that complaints can be received via a Local Authority Councillor, Board Member, MP, Mayor's Office, or a 3 <sup>rd</sup> party acting on behalf of a customer, with their consent, unless there is a legal basis, under the Data Protection Act 2018, to share personal information with a 3 <sup>rd</sup> party representative without consent.
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	Stage 1 and 2 response letters; Leaflets; Posters; Information on our website can be accessed here.	We inform tenants in all our complaint responses of the full contact details for the Housing Ombudsman. We also advertise the details of the ombudsman on our web pages. We inform tenants of the right to access the Housing Ombudsman service within our complaint response letters at all stages and provide full contact details. We also advertise the details of the ombudsman on our web pages. We publicise the Meet the Ombudsman Events on our website. We have leaflets and posters providing this information at our reception points.

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

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team	YES	Structure Chart detailing	We have a centralised a team of Customer Relations

	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.		the Customer Relations Team;  Customer Feedback Reports to Performance and Scrutiny Committee.  Minutes of City of Doncaster Council Overview and Scrutiny Committee can be found here.  The latest report to CDC cabinet on complaints can be found at St Leger Homes Performance Report 202425 Quarter 3 Cabinet Report.pdf	Officers, who take responsibility for processing complaints. The Complaints Manager in the team is responsible for liaising with the Housing Ombudsman's Office. The same team report quarterly to our Customer and Performance Committee detailing the number of complaints received, how quickly we have responded, key themes and learning.  In addition to this, a report is considered by the City of Doncaster's Overview and Scrutiny Committee on the number of complaints received, headline reasons and response times. Complaint numbers and how we are performing against key performance indicators are also reported quarterly to the City of Doncaster Council's Cabinet meetings
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	Emails between Service Investigation Officers (SIO) and the Customer Relations Team.	The Customer Relations Team of officers and those investigating complaints have the authority to offer resolutions and remedies. The Customer Relations Team will challenge SIO's where they feel a complaint response does not sufficiently deal with complaint or where the remedy proposed in insufficient. Where approval is required by the relevant area of the business we have procedures in place to ensure that the approval receives a prompt response. There are escalation procedures built in where approval may not be forthcoming by escalation to the relevant Head of Service (i.e., the Head of Customer Services and the relevant Head of Service for the area being complained about.)
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	YES	Internal Complaints Charter; Customer Excellence Training; Complaints Training.	All staff have received Customer Excellence Training which encompassed an element of dealing with complaints. All Service Investigation Officers and Officers in the Customer Relations Team have received detailed complaint training. An internal Customer Charter has recently been completed

complaints are seen as a core service and must be resourced to handle complaints effectively	You Said We Did can be found here	setting out the various stages of handling a complaint and employees' responsibilities. An e-learning module based on the Customer Charter is also in the process of being produced and this will supplement the face-to-face training and the Charter. Learning from complaints is identified and reported to Customer and Performance Committee and where appropriate to report back to customers using a You
		Said, We Did approach which is published on our website.

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

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here.	We have a single policy for dealing with complaints and have a culture whereby complaints are seen as an opportunity to learn and improve. Other polices which include a reference to complaints will refer to the one policy to ensure consistence of approach across the organisation.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7 – 7.3, 7.5 and 7.11)	We do not have an informal complaint or Stage 0 complaints stage or informal complaints as part of our procedures. We follow the requirement of criteria 1.2 and 1.4 of the Code.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Sections 7.1 – 7.22) Stage 2 template letter.	Our Policy and process does not have more than 2 stages. All the information we provide to customers such as on the web, leaflets and posters clearly set this out. All Stage 2 responses advise that this is the final stage, the next stage for the complainant being to refer the matter to the Housing Ombudsman Service.

5.4	Where a landlord's complaint response is handled by a third party (e.g., a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Sections 4.2 and 5.3)	All complaints regarding the services provided by a contractor working on behalf of St Leger Homes are investigated by a St Leger Homes' members of staff. This includes Stage 1 and Stage 2 complaints. Whilst we will contact the contractor to discuss and evidence the complaint, the findings and response sent to the complainant are sent by St Leger Homes.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 5.3)	As advised above.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition." If any aspect of the complaint is unclear, the resident must be asked for clarification.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.2); Stage 1 and 2 template letters.	Both our Stage 1 and Stage 2 letters sets out our understanding of the reasons for the complaint and the remedy the customer is looking for. Where this is not clear this is clarified with the complainant. This also forms part of our Stage 2 procedures.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.2) Complaints Procedures	Our complaint procedures set out that where we are not responsible for any aspect of a complaint, that this is included in the acknowledgement letter, together with the reason. The need to manage expectations is covered in our complaint handling training. We would contact the complainant for further information where this is not clear.
5.8	At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and	YES	Complaints Training; Internal Complaints Charter	Complaints are investigated by the relevant service areas and coordinated by the Customer Relations team to ensure they are completed within timescales and a full and fair response. All Service Investigating Officers and the Customer relations officers have had training to ensure fairness of approach and to ensure complaints are thoroughly investigated and where appropriate backed up by evidence. All Service Investigation Officers receive training on how to investigate complaints to ensure they have the skills and mindset to investigate complaints fairly and

	d. consider all relevant information and evidence carefully.			objectively. This training helps to embed a positive complaints culture throughout the organisation.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.7 and 7.21) Complaints Procedures	Tenants are kept informed and updated during the complaints process and where timescales have been extended outside service standards, we keep the tenant informed by telephone, this is also confirmed in writing. We capture this information in our Housing Management System.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 6.3);  Open Housing System and tenant attribute fields  Equality, Diversity and Inclusion Policy can be found here.	Each complainant has a dedicated Customer Relations Officer. Reasonable adjustments are agreed by conversation with the dedicated officer, and we record any reasonable adjustments regarding method of communications in our Customer Relationship Management system. This includes information on preferred method of contact or specific requirements, which could be by phone, text, email or in writing. For example, we have a number of customers who due to dyslexia request their correspondence on specific coloured paper.  Our Equality and Diversity policy states that we will "Collect and update data around our customers so we have a better understanding of their needs such as our vulnerable customers so we can overcome any barriers and tailor services to meet their needs."
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.22)	We inform tenants in our responses about the right for review and all response letters / emails include full contact details for the Housing Ombudsman.  • the general law, unless wrongly applied;  • requests for new services;  • persons or bodies over which SLHD has no control;  • Where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and the Particulars of Claim, have been filed at court;  • the subject of the complaint occurred more than 12 months ago and/or is already subject to an on-going

				or resolved complaint;  matters that have already been considered under the complaints policy.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	YES	Open Housing – Customer Relationship Management System  Document Management System (Enterprise)  Complaints Procedures	All customer interaction is logged on our Customer Relations Management system. This captures when a customer contacted us, what about, what action we took as a result and when. This provides a full audit trail of the complaint. Correspondence and emails are all stored on our document management system.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	YES	Goodwill and Compensation Policy	Our aim is to remedy complaints as soon as possible. All staff are aware of this through discussions at Service Management Team meetings and as part of training delivered to Service Investigation Officers. Our Goodwill and Compensation policy sets out how we deal with remedies.
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	Policy document: Compliments, Comments and Complaints. A copy of the policy can be found here. (Sections 8.1 – 8.4)	Our Compliments, Comments and Complains policy includes a section on Unreasonable behaviour and unreasonably persistent complainants. The policy references our separate policy Unacceptable Behaviour Policy which sets out how we will address unreasonable behaviour and persistent complainants. We have a set process, procedure and letter template that is followed for this. We have warning procedures in place for all employees to follow for managing unacceptable behaviours.
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.		Policy document: Unacceptable Behaviour Policy; Compliments, Comments and Complaints Policy Section 8.2	This is clearly set out in our Complaints Policy which includes sections for unreasonable behaviour and also sections on reasonable adjustments. All employees undertake mandatory equality and diversity training.

Section 6: Complaints Stages - Stage 1

	Code requirement	Comply : Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	YES	Stage 1 and Stage 2 Complaints Procedures; Training for Service Investigating Officers	This is covered in the training delivered to the members of the Customer Relations Team and also is referenced in our complaint procedures.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7- 7.6)	This is part of our procedures and is in our policy. All complaints are logged and acknowledged within 5 working days of receipt.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.7)	We aim to respond to most Stage 1 complaints in writing within 10 working days of date of acknowledgement, however this can take longer if the complaint is of a complex nature. If longer, we contact the customer and agree with the resident suitable intervals for keeping them informed.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.7)	As above at 6.3. We do not extend responses beyond an additional 10 working days unless there are extenuating circumstances which we would clearly explain to the resident and follow up in writing.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found	We always provide the Housing Ombudsman's contact details where we have informed a complainant about an extension to the response timescales.

	details of the Ombudsman.		here. (Section 7.7)	
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	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. Section 7.3	Our process is to respond to complaints following the completion of the investigation, not when any actions stemming from the investigation have been completed. We record these actions as "promises" made and is part of our procedures. We record these separately and they are monitored by the Customer Relations Team to ensure they are delivered.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. Section 5.6	A full response is given to the tenant in all cases. The Customer Relations Team provide a check and challenge procedure to ensure all issues raised in a complaint are responded to with full details of the investigation, the reasons the issue occurred, remedial actions to be taken, if applicable and learning.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. Sections 7.8 and 7.9	This forms part of our policy and all staff are trained and aware of the procedures.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 5.6)	A full response is given to the tenant in all cases and a template is used by all Service Investigation Officers when responding to complaints. The Customer Relations Officer ensure that all these criteria are followed. There is a procedure in place to make sure all parts of the complaints are answered in one response backed with full details of the investigation and remedial actions if applicable. Details of how to escalate if the complainant is not happy are included with the response.

to stage 2 if the individual is not satisfied		
with the response.		

## Section 6: Complaints Stages - Stage 2

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at Stage 1, it must be progressed to Stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.11)	Our policy and procedures include a Stage 2 review process which is communicated in correspondence to complainants.
6.11	Requests for Stage 2 must be acknowledged, defined and logged at Stage 2 of the complaint's procedure within five working days of the escalation request being received.	YES	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.13)	These timescales are set out in our policy and meet the requirement of the code.
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	Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.11)	A resident does not have to provide the landlord with their reasons for expressing dissatisfaction with their Stage 1 complaint. We will communicate with the complainant to establish their reasons for escalating and their desired outcome. However, we will not refuse an escalation request based on the resident not providing their reasons. A Stage 2 response should be a review of the initial stage 1 response. Therefore, reasons for escalation are not required for this review to be carried out.
6.13	The person considering the complaint at Stage 2 must not be the same person that considered the complaint at Stage 1.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.16)	A different Customer Relations Officer will be allocated the complaint at Stage 2. Our procedures is for a Head of Service to review Stage 2 complaints. This is a different person to whom considered the complaint at Stage 1.
6.14	Landlords must issue a final response to the Stage 2 within 20 working days of the complaint being acknowledged.	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here.  (Section 7.20)	The majority of Stage 2 complaints are responded to within 20 days of the Stage 2 acknowledgement, where the complaint is complex and this is not achievable, we advise the complainant.
6.15	Landlords must decide whether an	YES	This requirement is defined	This is included in our complaints policy. As above at 6.14.

	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.		in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 7.21)	we do not extend responses beyond an additional 10 working days unless there are extenuating circumstances which we would explain to the resident.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	YES	This requirement is defined in our Policy document:  Compliments, Comments and Complaints . A copy of the policy can be found here.  (Section 7.21)	We always provide the Housing Ombudsman's contact details where we have informed a complainant about an extension to the response timescales.
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	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here.  Section 7.3	Our process is to respond to complaints following the completion of the investigation, not when any actions stemming from the investigation have been completed. We record these actions as "promises" made and is part of our procedures. We record these separately and they are monitored by the Customer Relations Team to ensure they are delivered.
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 requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here.  Section 5.6	A full response is given to the tenant in all cases. The Customer Relations Team provide a check and challenge procedure to ensure all issues raised in a complaint are responded to with full details of the investigation, the reasons the issue occurred, remedial actions to be taken, if applicable and learning. All Stage 2 reviews are undertaken by a Head of Service who has received full training on how to investigate a complaint.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	YES	This requirement is defined in our Policy document: Compliments, Comments and Complaints . A copy of the policy can be found here. (Section 5.6)	A full response is given to the tenant in all cases and a template used by all Service Investigation Officers when responding to complaints. The Customer Relations Officer ensure that all these criteria are followed. There is a procedure in place to make sure all parts of the complaints are answered in one response backed with full details of the investigation and remedial actions if applicable. Details of how to escalate if the complainant is not happy are

	e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			included with the response.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	YES	This requirement is defined in our Policy document:  Compliments, Comments and Complaints. A copy of the policy can be found here.  (Sections 7.16 and 7.19)	Our Policy sets out that Stage 2 reviews are undertaken and responded to by a Head of Service. The letter to the complainant advises that this is the final response and advises on the contact details of the Housing Ombudsman's Office should the complainant remain dissatisfied. The training undertaken by Heads of Service includes how to fully review and investigate complaints.

## **Section 7: Putting things right**

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These can include:	YES	Goodwill and Compensation Policy;  Complaint responses at Stage 1 and Stage 2.  Compliments, Comments and Complaints Policy Section 5.6. A copy of the policy can be found here.	Where a complaint is upheld, we provide a detailed explanation highlighting the improvements made and an apology. Our Goodwill and Compensation Policy supports the approach we will take to putting things right.

	Changing policies, procedures or practices.			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	Goodwill and Compensation Policy; Ombudsman's Remedies Guidance.	All decisions and resolutions to complaint cases are dealt with on a case-by-case basis and reviewed in line with our Goodwill and Compensation policy and by reference to the Housing Ombudsman's remedies guidance which we publish on our Intranet. The Customer Relations Team act as a check and challenge with regard to the remedies proposed by Service Investigating Officers to ensure any remedy offered reflects the impact on the resident.
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	Examples of responses to complaints.	This information is included in the response to the complainant. The Customer Relations Team track promises made to ensure these are actioned.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	Goodwill and Compensation Policy; Ombudsman's Remedies Guidance published on our Intranet and referenced in our Internal Complaints Charter.	Any remedy is awarded in line with our Goodwill and Compensation Policy and guidance issued by the Housing Ombudsman. The Housing Ombudsman's guidance is published on our Intranet and referenced in our Internal Complaints Charter.

# Section 8: Putting things right

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:		Annual Report to Overview and Scrutiny Management Committee (City of Doncaster Council) which can be found	Our performance is reported annually to the City of Doncaster's Council's Overview and Scrutiny Management Committee in September.
8.1	a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.	YES	here. Performance Reports to Customer and Performance Committee;	Complaint numbers and how we are performing against key performance indicators are also reported quarterly to the City of Doncaster Council's Cabinet meetings.
	b. a qualitative and quantitative analysis of the landlord's complaint		Self-Assessment reported to Board annually which can be	St Leger's Board receives a report annually to approve the self-assessment against the Housing Ombudsman's

	handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.		found here.  Annual Complaint and Service Improvement Report which can be found here.  The latest report to CDC cabinet on complaints can be found at St Leger Homes Performance Report 202425 Quarter 3 Cabinet Report.pdf	Complaints Code.  1/4ly and year end performance is also reported to our Customer and Performance Committee. Reports and publications from the HO such as spotlight reports are considered by the Executive Management Team. All this data is pulled together in an annual report which is considered by Board, reviewed by the Member Responsible for Complaints and reported by Executive Decision to the City of Doncaster Council;
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	YES	Overview and Scrutiny Management Committee Report can be found here.  Customer and Performance Committee Report can be found here.  Customer and Performance Committee Minutes reported to Board can be found here.	Our annual complaints performance is reported annually to the City of Doncaster's Council's Overview and Scrutiny Management Committee in September. The response and questions asked are taken down as minutes and are available on the CDC website.  We publish our complaint performance on a quarterly basis on our website, this shows the cumulative position and therefore the position at year-end.  Committee response to these reports are taken down as minutes and available on the SLHD website under the Board Reports section.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	YES	Self-Assessment reported to Board which can be found here.	The complaints code is taken into account where there are significant changes within the organisation that may impact on whether we are compliant with the code. The self-assessment is undertaken within the Customer Relations Team, who review the code and any impact. Senior managers are aware of the need to advise the Customer Relations Team of any significant changes.
8.4	Landlords may be asked to review and update the self-assessment following	YES	Self-Assessment reported to Board should this arise.	We will fully comply with this should this arise

	an Ombudsman investigation.			
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	Evidence will be provided should this occur	We will fully comply with this should this arise

Section 9: Scrutiny & oversight: continuous learning and improvement

	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	YES	Annual Complaint and Service Improvement Report which can be found here. Customer and Performance Committee Customer Feedback Report which can be found here.	We use learning from complaints to change the way in which we deliver our services and publish this on our website under our 'You Said, We Did' section. Complaints are also taken into account when reviewing policies. We publish learning in the Annual Complaint and Service Improvement Report and report this to our Customer and Performance Committee. Learning is also identified by Service Investigating Officers as part of the initial investigation of the complaint.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	YES	You Said, We Did on the website here; Customer Excellence Training; Customer and Performance Committee Customer Feedback Report which can be found here.	A positive complaint handling culture is promoted across the organisation using a variety of methods. Our Customer Excellence training focused on the customer and complaints. Our internal Customer Charter has a specific section about learning. Feedback from complaints is discussed at Leadership level and individual team level to inform changes in service delivery and improvements. The Customer Relations Team support all staff to be fully engaged in the complaints process. Feedback from complaints is used to inform policy and strategies and learning and is reported to Customer and Performance Committee.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and	YES	You Said, We Did on the website here; Customer and Performance Committee Customer Feedback	We advise the complainant of our failures (where applicable) and the actions we have taken to address these. We report to EMT, Customer and Performance Committee and Board on complaints performance and

	improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Report which can be found here; Annual Report to Overview and Scrutiny Management Committee (City of Doncaster Council) which can be found; Annual Complaint and Service Improvement Report which can be found here.	learning as well as to the City of Doncaster's Overview and Scrutiny Member Committee. Our Tenant Scrutiny Panel Complaint Sub Group periodically review a selection of complaint responses each quarter and report back their findings. These are shared with Heads of Service to improve service delivery and to share learning. The Annual Complaint and Service Improvement report includes a section on complaints and the changes we have made as the result of learning from complaints.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	YES	Complaint Performance Reports to EMT; Customer and Performance Committee Customer Feedback Report which can be found here.	The senior lead person accountable for complaints is our Chief Executive who is provided with the organisational overview of performance via reports to the Executive Management Team and Board.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	YES	Minute of Board meeting 7 <sup>th</sup> March 2024 can be found on our website here. (Under April 2024 – Agenda point 6)	The Portfolio Holder for Housing from City of Doncaster Council is designated Member Responsible for Complaints (MRC) we also have a Board Member Complaint Champion.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	YES	Minute of Board meeting 7 <sup>th</sup> March 2024 can be found on our website here. (Under April 2024 – Agenda point 6) Customer and Performance Committee Customer Feedback Report which can be found; Report to City of Doncaster Council's Overview and Member Scrutiny Committee. Annual Complaint and Service Improvement Report which can be found here.	The Housing Portfolio Holder (Member Responsible for Complaints) at the City of Doncaster Council and a Tenant Board Member (Board Member Complaint Champion) fulfil this role for the ALMO.  The Member Responsible for Complaint and the Board Member Complaint Champions are provided with reports submitted to the Customer and Performance Committee which detail volumes, trends, and outcomes from complaints, along with complaint handling performance as reported in the Minutes of Board meetings. They are also be provided with updates from the Housing Ombudsman's office on the outcomes of Ombudsman's investigations. The Board Member Complaint Champion is a member of

			The latest report to CDC cabinet on complaints can be found at St Leger Homes Performance Report 202425 Quarter 3 Cabinet Report.pdf	our Customer and Performance Committee to ensure regular reporting and insight into complaint performance. The MRC meets with the Chief Executive on a regular basis to ensure they have the information required to fulfil their role as MRC. They have oversight of the annual performance report prior to this being submitted to the City of Doncaster Council's Overview and Scrutiny Management Committee and also the Annual Complaint and Service Improvement report, which they are required to comment on.  They have a dedicated channel within Microsoft Teams to access relevant complaint information including best practice documents, spotlight reports and performance reports. The Complaint numbers and how we are performing against key performance indicators are also reported quarterly to the City of Doncaster Council's Cabinet meetings.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and  d. annual complaints performance and service improvement report.	YES	Performance Reports to Customer and Performance Committee; Annual Report to Overview and Scrutiny Management Committee (City of Doncaster Council) which can be found; Annual Complaint and Service Improvement Report which can be found here.	As indicated above at 9.6. This information is reported to Customer and Performance Committee on a ¼ly basis. In addition, the City of Doncaster Council's Overview and Scrutiny Management Committee receives a yearly report on complaints to enable effective challenge.  The self-assessment against the Complaint Handling Code is considered by Board each year and shared with the Tenant Board Complaint Champion and MRC. Board receive a report on outcomes from the Housing Ombudsman's findings of maladministration. These are also shared with the Member Responsible for Complaints and the Tenant Board Complaint Champion.  The Board approves the Annual Complaint and Service Improvement Report. This is also reported to the City of Doncaster Council Members via a signed Executive Decision Order by the Member Responsive for Complaints; Doncaster Council's Housing Portfolio Holder.

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and  c. act within the professional standards for engaging with complaints as set by any relevant professional body.	YES	Customer Feedback Reports to Customer and Performance Committee; Values and behaviours documents	This is an objective that is set for the organisation. Our leadership team work collaboratively to ensure that we are compliant with the Housing Ombudsman's code and to ensure that complaint are dealt with fairly and effectively. Our aim is to embed a positive complaints culture across the organisation and to ensure that learning from complaints is used positively to improve the customer experience and to ensure that where we have fell short we put in place appropriate remedies. Training which is underpinned through our values and behaviours which incorporate the specific professional standards set by the Chartered Institute of Housing. We are currently reviewing the professional qualifications of all employees to ensure we will be compliant with the requirement in the consumer standards.
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