

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 provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Statement of 'What is a complaint' contained within our Policy (Section 1)	
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	Statement of 'What is a complaint' contained within our Policy (Section 1) which states "Any concern and / or complaint can be raised directly by the tenant, or on their behalf by their advocate / personal representative".	
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	Yes	Statement of recognising difference between a complaint and service request contained within our Policy (Section 1) which states that a service request "will be attended to as per our published service standard, recorded, monitored	All staff are trained and aware of our Policy, and how to recognise the difference between a formal complaint, service request, and survey feedback and to take correct action to record and resolve any issue for

	recorded, monitored and reviewed regularly.		and regularly reviewed separate to our Complaints Policy". All service requests are recorded on our SASSHA 360 housing management system, and a suite of regular reporting is issued to relevant Managers.	our customers as soon as possible.
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	All service requests recorded on SASSHA 360 are date and time stamped with action(s) taken, providing a complete audit trail until resolved. Any complaints relating to dissatisfaction of the service request are recorded concurrently on our Complaints tracker until resolved. All staff are trained to ensure any dissatisfaction with the service received, a customer is informed how to raise 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	Encircle Housing has a section on our website where feedback on complaints can be made. We also include information about How to Make A Complaint in all tenant quarterly newsletters. An easy read How to Make a Complaint Factsheet and Complaint submission form have also been created and are available via our website.	The majority of engagement with our tenants is carried out in person by our staff. All staff have awareness raising training on complaints and to promote this among tenants where required, including when taking feedback. Encircle Housing includes a statement about how to raise a concern or make a

				complaint across all tenant facing media/publications.
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Statement of Exclusions is contained within our Policy (Section 2).	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	Yes	Statement of Exclusions is contained within our Policy (Section 2), as is what is acceptable as per Housing Ombudsman criteria.	

	<ul style="list-style-type: none"> 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	Statement of Exclusions contained within our Policy (Section 2) " In exceptional circumstances, EH may consider a complaint after this time limit has passed. If a customer feels that the time limit should not apply, they will need to tell us why so that a decision can be made".	
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	Statement of Exclusions contained within our Policy (Section 2) " If EH decide not to accept a complaint, EH will provide a detailed explanation setting out the reason(s) why the matter is not suitable for our complaints process. The complainant has the right to refer this decision to the Housing Ombudsman, or Northern Ireland Public Services Ombudsman who can instruct EH to take on the complaint, if they feel that the exclusion has not been fairly applied".	
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	Statement of Exclusions contained within our Policy (Section 2) which clearly sets out	

	must consider the individual circumstances of each complaint.		reasons that will not be considered as a complaint.	
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>i. Details of ways a complaint can be made is contained within our Policy (Section 1) either by phone, email, letter, online website form, social media or directly to a member of staff at face-to-face meeting. An easy read How to Make a Complaint Factsheet and Complaint submission form have also been created, and are available via our website.</p> <p>ii. The Policy meets our legal obligations outlined within Equality Act 2010. Encircle Housing are committed to ensuring all tenants are treated equally, fairly and honestly.</p>	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint	Yes	Statement on Staff Training and Development contained within our Policy (Section 8). All staff are aware complaints are to be communicated immediately to	

	to the appropriate person within the landlord.		the Complaints Officer to record and monitor.	
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	Encircle Housing is committed to providing a high-quality service, by listening and responding to the views of our customers and responding positively to all complaints. Statement contained within our Policy (Section 7) " A complaint is seen as an opportunity to learn about how we can improve our service at EH. We therefore want to learn from every complaint,".	Complaints are routinely reported to the board and as such we have an open and transparent relationship between the board and the executive.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	i. Details of Formal Complaints Process contained within our Policy (Section 4) outlining the two stages. ii. Policy is also available on our website 202404-EH-Complaints-Policy.pdf (encircleha.co.uk)	An Easy Read How to Make A Complaint Factsheet is available via our website
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is included within Complaints Policy at Section 6 Awareness, Independence and Confidentiality.	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	Statements are contained within our Policy " A service request from our tenant(s) and / or their representative" and " Any concern and / or complaint can	

	accompanied at any meeting with the landlord.		be raised directly by the tenant, or on their behalf by their advocate / personal representative”.	
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	Statement contained within our Policy “ Should a resident remain dissatisfied at the end of Encircles’ complaints process, they may submit their complaint to the Housing Ombudsman” and “ A customer has the right to contact The Housing Ombudsman Service at any stage throughout the EH complaint process” Contact details for Housing Ombudsman, and Northern Ireland Public Services Ombudsman are contained within Policy. Web link to HO Complaint Handling Code April 2024 contained within Policy.	Contact details are provided within Policy

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Statement of Independence and Confidentiality contained within our Policy (Section 6) states role of Complaints Officer sits within responsibilities of the Business Manager. The complaints officer is also the liaison lead with the Housing Ombudsman. Additionally, the Managing Director acts as the Member Responsible for Complaints (MRC).	All complaints are reported to our Governing Body quarterly within the MD Update Report.
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	The Complaints Officer reports directly to the Managing Director and has access to staff at all levels to facilitate the prompt resolution of complaints through Teams, email, phone call and face-to-face.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes	Encircle Housing commitment to complaint handling is evidenced in its early implementation of its Policy in 2020 against the Housing Ombudsman Services Complaint Handling Code (July 2020). As a small provider, we	Our Complaints Officer attended the CHC consultation webinar 10 th October 2023. The Complaints Officer is also registered on the HO online Centre for Learning

	core service and must be resourced to handle complaints effectively		have two members of staff, both with clear roles established within the Complaints Policy. The Complaints Officer and MRC have also registered as Members responsible for complaints on the Housing Ombudsman Centre for Learning platform.	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Encircle Housing have only one Complaints Policy, that is reviewed and approved by its Governing Body as per its documented control Review Date or, as and when should Legislation dictate. The Policy meets our legal obligations outlined within the Equality Act 2010.	
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	Yes	Details of Formal Complaints Process contained within our Policy (Section 4) outlining the two stages. There are no 'informal' or extra stages within our Policy.	

	complaint') as this causes unnecessary confusion.			
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	Details of Formal Complaints Process contained within our Policy (Section 4) outlining the two stages. There are no 'informal' or extra stages within our Policy.	
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	All complaints are handled by EH own staff: Complaints Officer, MRC, Senior Management Team or an Investigating Manager.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A as all complaints are handled by EH own staff: Complaints Officer, MRC, Senior Management Team or an Investigating Manager	
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	All complaints received are responded to with an acknowledgement in writing and issued to the complainant, with a copy of our Policy. The relevant Investigating Manager will follow with further written communication outlining their understanding of the complaint and action(s) to be taken to	

			resolve. Statement in Communicating with our Customers within our Policy (Section 5) states " We will keep our customers / their advocates / personal representatives regularly updated and informed even where there is no new information to provide".	
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	The relevant Investigating Manager's initial contact with the customer will clearly outline and advise which issues we are and are not responsible for within their complaint.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	All complaints will be treated fairly and honestly. The Policy defines that a complaint will be investigated in an impartial manner.	All complaints are managed and dealt with at Stage 1 by the relevant Investigating Manager, who are appropriately qualified in their respective roles.
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	Yes	Statements in Formal Complaints Process within our Policy (Section 4) both Stage 1 and Stage 2 " If longer is required, we will contact the complainant,	

	keeping them informed about their complaint.		with our reason(s) an extension is required and agree a new timescale”.	
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	Our housing management system SASSHA 360 details all tenants’ disabilities. We are able to identify customer’s who are vulnerable and account for their needs when handling their complaints. The Policy meets our legal obligations outlined in the Equality Act 2010.	As a Specialist Supported Housing provider, we regularly review the needs of tenants to ensure that we are able to engage with them in the most appropriate and effective manner available to us. Any adjustments will be considered as required and / or necessary.
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	Statement on Exclusions contained within our Policy (Section 2) states “ If EH decide not to accept a complaint, EH will provide a detailed explanation setting out the reason(s) why the matter is not suitable for our complaints process”.	
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	All complaints are recorded on a central register, overseen and monitored by the Complaints Officer. All complaints are assigned a unique reference number. The following details are required to be entered on to the registers: date received, complainant contact details, lead Head of Service details,	

			Investigating Manager, complaint details, target, actual and resolved dates and comments detailing all communications between parties. All communication(s) between parties and other relevant supporting documentation are saved within individual folders relating to the complaint.	
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	As per our Policy, Encircle Housing are committed to resolve the complaint as early as possible, and often before timelines stated within Stage 1 and Stage 2 process.	
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	Encircle has an ASB Policy that outlines how we address unacceptable behaviour from residents or others in their lives. Statement of Unacceptable, Abusive Behaviour, Unreasonable Persistent Complainants statement contained within our Policy (Section 9) including reference to Unreasonable or Unreasonably persistent complainants Policy V01 March	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	Statement of	

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.		Unacceptable, Abusive Behaviour, Unreasonable Persistent Complainants contained within our Policy (Section 9), including reference to Unreasonable or Unreasonably persistent complainants Policy	
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	As per our Policy, Encircle Housing are committed to resolving all complaints as quickly as possible, by agreement between parties. It is our aim to resolve any failure of service within 5 working days. Depending on the nature of the complaint and any effect on the health and safety of the tenant will be dealt with as a priority.	Timescales for responding to complaints are recorded on EH complaints log, and performance is reported to the Board quarterly on our corporate KPI report.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Statement of Formal Complaints Process within Policy (Section 4) outlines response times.	

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Statement of Formal Complaints Process within Policy (Section 4) outlines response times.	
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	Statement of Formal Complaints Process within Policy (Section 4) outlines response times. If longer is required, we will contact the complainant, with our reason(s) an extension is required and agree a new timescale.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	As stated in our Policy customer has the right to contact The Housing Ombudsman Service at any stage throughout the EH complaint process. Housing Ombudsman contact details are provided in Policy.	EH's template letter references "You have the right to contact The Housing Ombudsman Service at any stage throughout the complaint process, either directly or by a designated person". Contact details for the Housing Ombudsman are provided within our Policy.
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	Yes	Statement of Formal Complaints Process within Policy (Section 4) outlines response times. The customer will be kept informed throughout the process until resolved. All actions are tracked in our Complaints Register and	

	actioned promptly with appropriate updates provided to the resident.		housing management system, if relating to a repair.	
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	<p>Statement of Communicating with our customers within our Policy (Section 5) states that we will keep our customers / their advocates / personal representatives regularly updated, advising them of:</p> <ul style="list-style-type: none"> •The complaint stage reached. •The outcome of the complaint. •The reasons for any decisions made. •Details of any outstanding actions. •Details of how to escalate the matter if they remain dissatisfied. <p>Our Policy meets our legal obligations outlined in the following legislation:</p> <ul style="list-style-type: none"> • Housing Act 1996 • Equality Act 2010 • Localism Act 2011 • The Regulator of Social Housing Tenant Satisfaction Measures April 2023 	Our Policy has been benchmarked against the Housing Ombudsman's Complaint Handling Code, 1st April 2024

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	Version 1 of our complaints policy had been updated to make this explicit: Formal Complaints process (Section 4).	Encircle will consider all additional complaints and include any issues raised if appropriate and relevant, in Stage 1 and Stage 2
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Statement of Communicating with our customers within our Policy (Section 5) states that we will keep our customers / their advocates / personal representatives regularly updated, advising them of: <ul style="list-style-type: none"> •The complaint stage reached. •The outcome of the complaint. •The reasons for any decisions made. •Details of any outstanding actions. •Details of how to escalate the matter if they remain dissatisfied. 	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Statement of Formal Complaints Process within Policy (Section 4)	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Statement of Formal Complaints Process within Policy (Section 4)	
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	Statement of Formal Complaints Process within Policy (Section 4) states is complainant is dissatisfied with the outcome of the Stage 1, they can escalate to Stage 2, and is not required to provide a reason.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	As per our Policy, Stage 2 complaints will be dealt with by senior EH Complaints Panel comprising of The Managing Director and one nominated Non-Executive Director. A complaint about the Managing Director would be escalated under Stage 2 to the Chair of Encircle Housing and at least one other Non-Executive Director.	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Statement of Formal Complaints Process within Policy (Section 4)	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Statement of Formal Complaints Process within Policy (Section 4) Stage 2 states "If the complaint is complex and/or requires third-party involvement we will consult with the complainant with our reason(s) an extension is required, and agree a new timescale"	
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	As stated in our Policy customer has the right to contact The Housing Ombudsman Service at any stage throughout the EH complaint process. Housing Ombudsman, and Northern Ireland Public Services Ombudsman contact details are provided in Policy.	
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	Statement of Formal Complaints Process within Policy (Section 4) outlines response times. The customer will be kept informed throughout the process until resolved. All actions are tracked in our Complaints Register and housing management system, if relating to a repair.	
6.18	Landlords must address all points raised in the complaint definition and	Yes	Statement of Communicating with our customers within our	Our Policy has been benchmarked against the

	<p>provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>		<p>Policy (Section 5) states that we will keep our customers / their advocates / personal representatives regularly updated, advising them of:</p> <ul style="list-style-type: none"> •The complaint stage reached. •The outcome of the complaint. •The reasons for any decisions made. •Details of any outstanding actions. •Details of how to escalate the matter if they remain dissatisfied. <p>Our Policy meets our legal obligations outlined in the following legislation:</p> <ul style="list-style-type: none"> • Housing Act 1996 • Equality Act 2010 • Localism Act 2011 <p>The Regulator of Social Housing Tenant Satisfaction Measures April 2023.</p>	<p>Housing Ombudsman’s Complaint Handling Code, 1st April 2024</p>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; 	Yes	<p>Statement of Communicating with our customers within our Policy (Section 5) states that we will keep our customers / their advocates / personal representatives regularly updated, advising them of:</p>	<p>Encircle has a template response letter for Stage 1 and Stage 2 that ensure that covers these key areas.</p>

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>		<ul style="list-style-type: none"> •The complaint stage reached. •The outcome of the complaint. •The reasons for any decisions made. •Details of any outstanding actions. •Details of how to escalate the matter if they remain dissatisfied. 	
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>As stated in our Policy (Section 4) under Stage 2 "This is the final stage of the Encircle complaints process". Stage 2 complaints are dealt with the senior EH Complaints Panel comprising of The Managing Director and one nominated Non-Executive Director. A complaint about the Managing Director would be escalated under Stage 2 to the Chair of Encircle Housing and at least one other Non-Executive Director.</p>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.</p> <p>These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>Upon receipt of any complaint, a complaint acknowledgement letter is issued. The lead Head of Service investigating will then make contact the complainant and apologise, accept responsibility (if applicable), outline their understanding of the complaint and advise of action(s) that will be taken to resolve the complaint.</p> <p>Where a change of existing procedure is required, a Complaint Summary form is completed detailing and documenting "What could we have done differently".</p> <p>The closing letter / email to the complainant must confirm all actions taken to resolve the complaint to their satisfaction.</p>	Encircle has a template response letter for Stage 1 and Stage 2 that ensure that covers these key areas.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Statement in Formal Complaints Process in Policy (Section 4).	Encircle has a template response letter for Stage 1 and Stage 2 that ensure that covers these key areas.
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	Statement in Formal Complaints Process in Policy (Section 4).	Encircle has a template response letter for Stage 1 and Stage 2 that ensure that covers these key areas.

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Encircle Housing will consider the guidance issued by the Housing Ombudsman when deciding on any appropriate remedies.	
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; 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. 	Yes	<p>Our self-assessment is published on our website.</p> <p>Qualitative and quantitative analysis of the landlord's complaint handling performance is reported within our Annual Complaints Performance and Service Improvement Report.</p> <p>Service improvement statement included within our Annual Complaints Performance and Service Improvement Report.</p> <p>Our annual report includes complaints performance information.</p> <p>All of the above are included on our website and submitted with our online Housing Ombudsman Complaint Handling Code Annual Submission.</p> <p>We present to our Governing body, quarterly and annual complaints performance</p>	

			information, and performance against TSMs.	
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 on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual Complaints Performance and Service Improvement Report has been presented to the Board and published on our website with their response.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	As required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	As required.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	As required.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Statement of What we will learn from complaints within our Policy (Section 7).	
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	Statement of What we will learn from complaints within our Policy (Section 7).	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Our Annual Report and Annual Complaints Performance and Service Improvement Report are published on our website.	Encircle Housing issues its Quarterly Tenant Newsletter, which includes results from our Tenant Satisfaction surveys. These provided valuable feedback on the services within our organisation. Additionally, we receive and record feedback from Tenant Meetings. We have gathered views from a Tenant Satisfaction Survey that uses the 12 perception measures and additional

				questions around Encircle Housing's values and tenant involvement.
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	Our Managing Director, and Board Member is the senior lead and appointed Member Responsible for Complaints (MRC).	Encircle Housing are a small (less than 1000 units) organisation, this role is included within the responsibilities of the MRC.
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	Our Managing Director is the senior lead and appointed Member Responsible for Complaints (MRC).	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	We present to our Governing body, quarterly and annual complaints performance information, and performance against TSMs.	All complaints are reported to our Governing Body quarterly within the MD Update Report.
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	Yes	Quarterly and annual complaints performance information, and performance against TSMs is provided to the MRC and is also available within our Complaints	The MRC, and Board review, approve and have final sign-off of all published complaints performance information: Annual Report,

	<p>complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>Register and supporting complaint folders.</p> <p>The MRC has final sign-off of our Annual Complaints Performance and Service Improvement Report.</p>	<p>Self-Assessment and Annual Complaints Performance and Service Improvement Report and Board's response.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>This is embedded within our Complaints Policy, (Section 7) which has been published and benchmarked against recommendations within the Housing Ombudsman Services' Complaint Handling Code (April 2024) and compliance with The Regulator of Social Housings' Tenant Involvement and Empowerment standard.</p>	