

Complaint Handling Code – Anchor Self-Assessment (September 2023)

The complaint handling code has the following instructions on completing the self-assessment:

- This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.
- Evidence should be included to support all statements with additional commentary as necessary.
- Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Meeting the requirements of the code

Anchor continues to work closely with the Housing Ombudsman, and we have aligned our Complaints Policy and processes to the requirements of the Code and to ensure ongoing compliance with the Code, this year a small group of colleagues within Anchor carried out a desktop review exercise against the Code in which we:

- Updated the self-assessment and revisited the decisions and actions identified last year to improve our position
- Carried out some assurance checks on closed complaint cases
- Made further small changes to our Complaints Policy, Procedure and Resident Helpsheet as identified through an ARCO (The Associated Retirement Community Operators) audit
- Improved our complaint website pages following feedback from the Independent Resident Complaint Panel.

In January 2023, we created our 'Complaints Working Group' as a direct result of completing last year's Self-Assessment where, although compliant with the Code, we felt we could improve complaint handling in certain areas. The working group is made up of key stakeholders from across the business and is led by the Customer Relations Team Leader. They meet regularly with the aim to identify and tackle areas of improvement around complaints using complaints data, satisfaction survey results and insight work.

We believe all complaints and Housing Ombudsman determinations are an opportunity to learn and take meaningful action through the review of processes, policies and ways of working. This iterative approach ensures the insight gained continuously enhances the services we provide.

Sign off on the revised Complaints Policy and Self-Assessment was given by the Service Quality Committee on the 12 September 2023

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
Section 1 - Definition of a complaint			
Mandatory 'must' requirements			
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual Resident or group of Residents.	Yes	This is the definition of a complaint we use. It is quoted in the Complaints Policy and in our Resident Helpsheet.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>The instruction to do this is captured within the Complaints Policy and Resident Helpsheet. Reasons for not accepting a complaint are set out in these documents.</p> <p>Within Anchor in the last three years, we have not refused to accept a complaint.</p> <p>In the exceptional circumstances where we would not accept a complaint, we would provide a full explanation of why we won't accept the complaint, along with details of the Housing Ombudsman Service.</p> <p>We use the exceptions detailed below:</p> <p>The issue giving rise to the complaint occurred over six months ago. However, it may not be appropriate to</p>

			<p>exclude any complaints that concern safeguarding or health and safety issues.</p> <p>Matters that have previously been considered under our Complaints Policy.</p> <p>While our 'unacceptable behaviour guidance' says we would normally separate inappropriate or unacceptable behaviour (which is threatening, abusive or aggressive) from a complaint and answer the complaint fully, we reserve the right to not accept the complaint where we feel this is appropriate.</p> <p>Where the complaint is a dispute over legislation or is a matter that is already the subject of legal proceedings.</p> <p>The complaint is disputing the term of a lease, cost, or reasonableness of a service charge, sinking fund/reserve fund contribution, or rent increase. These complaints are initially dealt with as a 'service charge dispute' and if the resident is not satisfied we refer them to the First Tier Tribunal.</p> <p>The Customer Relations Team will make a determination when a complaint is not accepted.</p>
1.8	A complaints Policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to Residents.	Yes	The circumstances when a matter will not be considered are set out in the Complaints Policy and Resident Helpsheet. We use the examples provided in the Code as detailed within 1.7.

			<p>It is also covered in greater detail within the 'Managing Unacceptable Behaviour guidance' which supports our Complaints Policy.</p> <p>The Independent Resident Complaints Panel was consulted (October 2022) about the circumstances we have set out where matters will not be considered and they confirmed that, in their opinion, these were fair and reasonable.</p>
Best practice 'should' requirements			
1.3	The Resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative should still be handled in line with the landlord's complaints Policy.	Yes	<p>We use the Code's definition of a complaint in the Complaints Policy and the Resident Helpsheet. This is covered within our refreshed complaint handling e-learning training (which became mandatory for certain relevant colleague roles in October 2023).</p> <p>We also detail in the Complaint Policy and Resident Helpsheet who we will accept a complaint from. In summary, this is anyone, or the representative of anyone, who has expressed dissatisfaction about the services provided by Anchor.</p>
1.4	Landlords should recognise the difference between a service request, where a Resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	<p>We explain the difference between a 'service request' and a Complaint in our 'Complaint and Compliments Procedure' and our Resident Helpsheet. Our e-learning training also gives working examples.</p> <p>From December 2022, we have started triaging with operations colleagues to ensure service requests are not logged as complaints and are handled by the local</p>

			management team.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	<p>We carry out satisfaction surveys by phone using an approved agent. If the resident expresses dissatisfaction, the caller is advised by us to forward the details by email to the Customer Relations Team.</p> <p>We also ask the resident if they want an Anchor representative to contact them.</p> <p>Following a review, the resident would if necessary be contacted to establish if they would like to make a complaint.</p>
1.9	If a landlord decides not to accept a complaint, a detailed explanation should be provided to the Resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	<p>The requirement to provide such an explanation is set out in the Complaint Policy and made known to complainants via the Resident Helpsheet. (The latter being sent out with every acknowledgement letter or email)</p> <p>The correspondence back to the resident would also mention the right to take this to the Ombudsman.</p> <p>In exceptional circumstances, when not accepting a complaint, we provide a full explanation why we won't accept the complaint along with details of the Housing Ombudsman Service.</p>
Section 2 - Accessibility and awareness			

Mandatory 'must' requirements			
2.1	Landlords must make it easy for Residents to complain by providing different channels through which Residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>We accept complaints through a variety of different channels. These are all mentioned in the Complaint Policy, Resident Helpsheet and on our external website:</p> <p>In person via the local manager or another Anchor representative</p> <p>Telephone - 0800 731 2020</p> <p>Email – Customer.Relations@Anchor.org.uk</p> <p>Webform on our website – https://www.anchor.org.uk/guides-and-support/customer-relations-complaints-feedback</p> <p>Post – Anchor Customer Relations Team, 2 Godwin Street, Bradford, BD1 2ST</p> <p>By completing one of our 'We welcome your feedback' forms available at all locations.</p> <p>Social Media – using our Facebook page or twitter.</p> <p>Several of these communication channels, (phone, email, website, in person to local manager) are also mentioned in a poster entitled, 'We welcome your feedback' which is available on the communal noticeboard on a scheme. We also have a leaflet which contains a form that can be completed and free posted to the Customer Relations Team.</p>
2.3	Landlords must make their complaint Policy available in a clear and accessible format for all Residents. This will detail the number of stages	Yes	Our complaint Policy and the Resident Helpsheet on complaints detail stages, what happens at each stage and our timeframes for responding.

	involved, what will happen at each stage and the timeframes for responding.		<p>We make our Policy / Resident Helpsheet available to view and/ or download through our website, these are available in large print, audio, braille, and electronic versions. We also offer a translation service via an external company (CODEX). Our Customer Support Team co-ordinates all requests for alternative formats.</p> <p>Residents are advised of their ability to obtain a copy of the Complaints Policy / Helpsheet through the 'We welcome your feedback' poster located on noticeboards in our locations.</p> <p>Publicising the availability of the Complaints Policy has also been mentioned in the Resident Annual Report 2022/23 and will also be in this year's report. It has also been mentioned in our resident magazine, 'Life'. We typically include reference to our Complaints Policy and how to make a complaint in Life magazine once a year (this took place most recently in autumn 2022).</p> <p>We also include it at least once a year in the monthly housing newsletter templates (this took place most recently in October 2022).</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints Policy and process must be easy to find on the website.	Yes	<p>Our website has a dedicated section called 'Customer Relations, Complaints and Feedback'. This section of our website includes the Policy/ Helpsheet which can be viewed and downloaded. There is in addition a webform to make a complaint and links to the Housing Ombudsman Code and Anchor's Self-assessment against the code.</p>

			In Summer 2023, our Independent Resident Complaint Panel reviewed our website pages, feeding back some small changes which have been implemented.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, Procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their Policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>We have a separate Reasonable Adjustments to Services Policy.</p> <p>All colleagues receive training on Equality, Diversity, and Inclusion. Enhanced training (which includes identifying and responding to requests for reasonable adjustments) is provided to those colleagues with line management responsibility.</p> <p>Recognising a reasonable adjustment request is also included in our complaint handling e-learning module. This training is a mandatory requirement for all complaint handlers when launched October 2023</p>
2.6	Landlords must publicise the complaints Policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with Residents.	Yes	<p>The Complaint Handling Code, Complaints Policy and reference to the Housing Ombudsman scheme are all mentioned on the 'Customer Relations, Complaints and Feedback' section of our website.</p> <p>Reference to the Code is also made in the 'We welcome your feedback' leaflet and poster (available on locations with communal areas) and 2022/23 Resident Annual Report.</p> <p>The Policy is publicised as per section 2.3 of this self-assessment. Acknowledgement letters contain a copy</p>

			<p>of the Resident Helpsheet which captures the key elements of the Policy as well as aspects of our complaints Procedure/ process.</p> <p>The role of the Housing Ombudsman, plus contact details are available in the Helpsheet, website and in our final response letters.</p>
2.7	Landlords must provide Residents with contact information for the Ombudsman as part of its regular correspondence with Residents.	Yes	<p>Contact information for the Housing Ombudsman is provided in the Resident Helpsheet which is sent to the resident with our acknowledgement of their complaint.</p> <p>In addition, and as per our, 'Complaints and Compliments Procedure', our final stage 2 response letter, (or extension letter) will have a reference to the relevant ombudsman service including their contact details.</p>
2.8	Landlords must provide early advice to Residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	The Resident Helpsheet sent with our acknowledgement letter states that the resident is able to contact the housing ombudsman for advice and support throughout the complaints process.
Best practice 'should' requirements			
2.2	Where a landlord has set up channels to communicate with its Residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received	Yes	The 'Complaints and Compliments' Procedure (which exists to support the implementation of our Policy) along with a separate social media Policy explain to colleagues how to deal with complaints received via social media. These state that complaints should not be responded via public social media but directly

	via social media and how confidentiality and privacy will be maintained.		<p>messed. The social media Policy and our Acceptable use of IT Policy state how privacy and confidentiality should be maintained.</p> <p>All colleagues who are authorised to use social media on behalf of Anchor will first have received training on its use and in maintaining confidentiality.</p>
Section 3 - Complaint handling personnel			
Mandatory 'must' requirements			
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>Our Customer Relations team are responsible for acknowledging, logging, tracking, and overseeing the progress of complaints.</p> <p>The Customer Relations Team Manager is responsible for providing reports to the Governing Body.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>All Complaint responses are quality checked before they go out by the complaint handler's line manager to ensure they fully answer the complaint and are to a good standard. Any identified performance issues should be picked up and addressed by the line manager through the provision of additional support and (if necessary) training regarding the handling of complaints.</p> <p>Our Customer Relations Team as part of their standard approach will look out for conflicts of interest when allocating responsibility for a complaint, for example a complaint would not be allocated to an</p>

			individual who is the subject of the complaint.
Best practice 'should' requirements			
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset Residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>As detailed above (3.2) complaint handlers can access training and support to help them deal with complaints. We use the LEAP (Listen, Empathise, Ask, Paraphrase, and summarise) communication model within the training.</p> <p>An updated version of our complaint e-learning training went live on 1 October 2022. From October 2023, this will be mandatory for roles identified that handle complaints.</p> <p>The e-learning module is also available for all colleagues.</p> <p>A section of our e-learning module contains advice on communicating with residents in difficult circumstances.</p> <p>In addition, to ensure that colleagues have access to 'staff at all levels to facilitate quick resolution', the Customer Relations team send the complaint handler details of all colleagues involved in the complaint response. We also include in the Complaint Procedure detail.</p> <p>In last year's assessment we made a commitment to identify key roles within the repair and planned works teams that act as a key contact for complaint handlers, allowing swift resolution of complaints. This took effect in spring 2023.</p>

Section 4 - Complaint handling principles			
Mandatory 'must' requirements			
4.1	The Ombudsman does not consider it appropriate for complaints to be handled 'informally', at 'stage 0', 'pre-complaint stage' or in any other way that keeps the complaint outside of the complaints process, even for a short time. When a complaint is made, it must be acknowledged and logged at stage one of the complaints Procedure within five days of receipt.	Yes	We have guidance for colleagues within our Procedure regarding the difference between a 'service request' and a complaint. We therefore expect all complaints to be formally logged. There is no informal handling of complaints permitted. We acknowledge and log complaints within 5 working days of receipt.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the Resident is seeking. If any aspect of the complaint is unclear, the Resident must be asked for clarification and the full definition agreed between both parties.	Yes	In our new acknowledgement letter (launched 1 October 2022) we set out our understanding of the complaint, and the outcome the resident is seeking. To help ensure we have got this right we then have a follow up call with the resident within 2 working days. It may be that the call itself could remedy the complaint if an apology is sufficient.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our Procedure explains how complaints should be dealt with impartially, this is supported by complaint handling E-learning training and the check by the complaint handlers line manager on the proposed correspondence.

4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>We cover these points in the e-learning, webinars and within the Procedure.</p> <p>All Complaint responses are quality checked before they go out by the complaint handlers line manager to ensure they fully answer the complaint and are to a good standard. Any identified performance issues should be picked up and addressed by the line manager through the provision of additional support and (if necessary) training regarding the handling of complaints. An audit undertaken during June 2022 found no issues of this nature.</p> <p>We identified in last year's self- assessment an improvement to introduce an audit of complaint responses. From Quarter 4 2022/23 we have been auditing a percentage of complaint responses. This is in its early stages, but any learnings will be fed through the Complaints Working Group for wider distribution.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with Residents in terms of frequency and method of communication.	Yes	<p>We always respond to the resident in their preferred method of contact (we check if this is appropriate within the acknowledgement letter and during the 2-day call), adhering to any agreements in terms of frequency.</p> <p>This can be tracked by the Customer Relations Team by regular reporting.</p>

4.12	<p>The Resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	<p>This is covered in the Complaints Procedure, within the 'Investigating a complaint' section.</p> <p>It is also built into the Customer Relations internal Processes.</p>
4.13	A landlord must include in its complaints Policy its timescales for a Resident to request escalation of a complaint.	Yes	The Policy includes the timeframe in which a resident must request escalation. We will however consider exceptions that fall out on this timeframe.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints Procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints Policy and must be the same as the reasons for not accepting a complaint.	Yes	<p>The Policy explains the reasons for declining a complaint or refusing to accept a complaint. These are detailed in 1.7.</p> <p>If we do refuse to escalate a complaint, we will provide an explanation as to why we are refusing. We will also provide details of the Housing Ombudsman Service.</p>
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the Resident, correspondence with other parties and any reports or surveys prepared	Yes	Our system (Northgate) ensures we store all correspondence and details regarding (including the date received) the complaint.
4.18	Landlords must have policies and Procedures in place for managing unacceptable behaviour from Residents and/or their representatives when pursuing a complaint.	Yes	We have separate guidance which sets out how we deal with unacceptable behaviour from residents (and or their representatives) regarding complaints.

Best practice 'should' requirements			
4.3	Landlords should manage Residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>After sending an acknowledgment letter (with the Resident Helpsheet) we will telephone the resident. This call will confirm our understanding of the complaint and the outcome expected by the resident. It will also be used if applicable to manage the resident's expectations if it is clear to us that the desired outcome is seen as unrealistic or unreasonable.</p> <p>We see the call as an important step to meeting this point and managing expectations. To ensure that the call is carried out we are reporting monthly the percentage of calls carried out per area to housing colleagues. Non-compliance can therefore be addressed.</p>
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the Resident and whether there are any urgent actions required.	Yes	The telephone call with the resident (mentioned in 4.3 above) is set to happen within two working days following receipt of the complaint. The call provides us an opportunity to talk through the complaint and possibly resolve it should the resident be happy with this. If this is not possible, we will progress the complaint and provide a response within the Code's timeframes (wherever possible).
4.5	Landlords should give Residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	Our Policy allows for a friend, representative or advocate of the resident to deal with a complaint on a resident's behalf. This is also detailed in the Resident Helpsheet.

			In addition, our 'Reasonable adjustments' Policy we would always consider reasonable adjustments for a person with a disability, we cover reasonable adjustments within our e-learning training.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	We explain this within our complaints and compliments Procedure and signpost colleagues to where to get support, such as from our in-house legal team.
4.9	Communication with the Resident should not generally identify individual members of staff or contractors.	Yes	<p>This is included within the Procedure. We say 'the complaint response should not generally identify individual colleagues or contractors.'</p> <p>However, where the resident (within their complaint) has named a colleague(s), it is common practice to also name the colleague(s) as they are already known to the resident.</p>
4.10	Landlords should keep Residents regularly updated about the progress of the investigation.	Yes	<p>We keep residents updated regularly throughout the complaints process. We do this initially with the phone call within two days. We aim to answer the complaint within ten working days from logging and acknowledgement. If we require more time to complete the complaint investigation, we will contact the resident explaining this. We always use the resident's preferred method of contact. This is detailed within the Complaints Procedure and reflected in the E-learning training.</p> <p>Each week, a report containing all open complaint cases (which shows when the last contact was made</p>

			with the residents involved), is sent to senior colleagues for review and action.
4.16	Landlords should seek feedback from Residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>We invite all resident that have been through the complaints process to participate in our monthly complaint surveys.</p> <p>We also carry out a quarterly survey on the Tenant Satisfaction Survey questions (of which complaints is one of them).</p> <p>We ask a variety of questions, and we seek permission to use the data to drive improvements. The learnings will from October 22 be captured and highlighted in reporting to Housing Services Committee and Service Quality Committee, with action trackers in place to understand progress.</p> <p>The training covers using feedback to identify and drive improvements – we support colleagues in a variety of ways through the Bridge, webinars, E-learning and invite colleagues to participate in learning sessions from both survey and complaint learnings.</p> <p>We share these learnings with colleagues and set action plans to ensure we capture learning from complaints. The Customer Insight Manager oversees this process.</p>

4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	<p>As detailed in 4.16 we value learning from complaints.</p> <p>We have a Customer Insight Manager whose role includes insight work into Complaints and sharing, tracking, and addressing these learnings with senior colleagues reporting findings to Anchor's Boards and Committees.</p>
4.19	Any restrictions placed on a Resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the Equality Act 2010.	Yes	Our document (Complaints - managing unacceptable behaviour) includes guidance for colleagues around restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions on the Equality Act.
Section 5 - Complaint stages			
Mandatory 'must' requirements			
Stage 1			
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the Resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>We always look to respond to a complaint within 10 working days of it being logged. Should we, in exceptional circumstances, need longer we will explain this to the resident, this decision is made by the complaint handler, Customer Relations Team.</p> <p>This timeframe will not exceed a further 10 working days without good reason. This is recorded in our Policy, Procedure and Helpsheet.</p> <p>We track (and report) all complaint cases up to and beyond the service level (10 working days).</p>

			Each week, a report containing all open complaint cases, with those over ten working days being the focus, is sent to senior colleagues for review and action.
5.5	A complaint response must be sent to the Resident when the answer to the complaint is known, not when the outstanding is required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the Resident.	Yes	<p>The Procedure explains that complaints shouldn't be delayed because of an outstanding action.</p> <p>The Customer Relations team have processes in place to ensure that the complaint is not delayed due to an outstanding action.</p> <p>Within the Procedure we provide guidance to colleagues around outstanding actions and that these should be tracked and actioned and provide updated to the Resident.</p>
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant Policy, law, and good practice where appropriate.	Yes	<p>Our Procedure and training captures this along with the check that the line manager carries out to ensure the response meets these requirements.</p> <p>Our guides on letter construction prompt colleagues to cover all these matters when drafting their response and a template with this information on is provided when a complaint is assigned to them.</p> <p>Colleagues have access to letter writing courses should they wish to do them or if it's highlighted as a development requirement through performance management.</p>

			As detailed in 4.7 we are now auditing a percentage of complaint responses, learnings from this process are used to improve complaint handling.
5.8	<p>Landlords must confirm the following in writing to the Resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stages the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the Resident is not satisfied with the answer 	Yes	<p>Our Procedure and training captures this along with the check that the line manager carries out to ensure the response meets these requirements.</p> <p>Our guides on letter construction prompts colleagues to cover all these matters when drafting their response.</p>
Stage 2			
5.9	If all or part of the complaint is not resolved to the Resident's satisfaction at stage one it must be progressed to stage two of the landlord's Procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the Resident's right to approach the Ombudsman about its decision.	Yes	<p>This is captured in our Procedure and internal processes, along with the Complaints - managing unacceptable behaviour guidance.</p> <p>Our guides on letter construction ensure that details of escalation are explained, along with contact details of the Housing Ombudsman. This is also explained in our Policy and Resident Helpsheet. See 5.11 this explains what we would do in the exceptional circumstance that we decline to escalate a complaint.</p>
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the Resident is seeking. If any aspect of the complaint is unclear, the Resident	Yes	As part of our stage 2 acknowledgement letter, we set out our understanding of the complaint and ask the resident to contact us if they wish to add, correct, or clarify anything.

	must be asked for clarification and the full definition agreed between both parties.		
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the Resident.	Yes	<p>It is within our Policy that there may be rare and exceptional circumstances where it is necessary to immediately escalate a new complaint to the final stage of the internal process. This will be at the Customer Relations Manager's discretion.</p> <p>In all other circumstances complaints will only be escalated when they have completed stage 1 of the process and the system supports this as our standard practice.</p>
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	<p>This is supported by our internal processes and our Procedure says that: 'Complaints at stage 2 will be undertaken by a senior colleague, independent of where the initial response originated to ensure impartiality and the objectivity of the review'.</p> <p>The Customer Relations team is responsible for assigning complaints and are trained how to do this. If they are unsure, they will seek direction from the Customer Relations Manager.</p>
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the Resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>This is part of our complaint handling process; the Customer Relations team have oversight and track the processes to ensure timescales are met. This is also detailed within the Policy, Procedure and Helpsheet.</p> <p>We provide reports to senior colleagues and committees on our Key Performance Indicators (these</p>

			been time taken to respond to a complaint).
5.16	<p>Landlords must confirm the following in writing to the Resident at the completion of stage two in clear, plain language:</p> <p>the complaint stages</p> <p>the complaint definition</p> <p>the decision on the complaint</p> <p>the reasons for any decisions made</p> <p>the details of any remedy offered to put things right</p> <p>details of any outstanding actions</p> <p>and</p> <p>if the landlord has a third stage, details of how to escalate the matter to stage three</p> <p>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the Resident remains dissatisfied.</p>	Yes	<p>We ensure that we meet this requirement at both stage one and stage two.</p> <p>Our guides on letter construction that use at stage one and two ensure that these items are covered along with the check from the respondent's line manager before the response is sent.</p>
Stage 3			
5.17	Two stage landlord complaint Procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have a two-stage complaints process

5.20	<p>Landlords must confirm the following in writing to the Resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the Resident remains dissatisfied 	Not applicable	Not applicable
Best practice 'should' requirements			
Stage 1			
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is our practice and is explained within our Policy and Resident Helpsheets.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the Resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	This is included in our Policy/ Procedure and processes, and our guides on letter construction help ensure this happens and include the Housing Ombudsman contact details agreement not be reached with the resident.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the Resident.	Yes	Our Customer Relations team where necessary can access previous complaint responses subject to our data retention Policy and Privacy Notice.

5.7	Where Residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	<p>This is our standard practice, and the Customer Relations Team would ensure that this happens.</p> <p>To ensure this happens we have a letter guide, and we include this in our Customer Relations team training on internal processes.</p>
Stage 2			
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is within our Policy, Procedure and Resident Helpsheet.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the Resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This is included in our Policy/ processes for stage one and stage two, please see 5.3 for an explanation.
Stage 3			
5.18	Complaints should only go to a third stage if the Resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the Resident.	Not applicable	N/a - we don't have a stage 3.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the Resident can	Not applicable	N/a - We don't have a stage 3.

	challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.		
Section 6 - Putting things right			
Mandatory 'must' requirements			
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	<p>This is detailed within our e-learning training and reflected in our Policy and Procedure.</p> <p>The complaint response is checked and signed off by the investigator's line manager.</p>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the Resident as a result. A landlord must carefully manage the expectations of Resident and not promise anything that cannot be delivered or would cause unfairness to other Residents.	Yes	<p>Our Procedure covers this point as does our Compensation Policy. We also cover this within our Complaint Handling e-learning.</p> <p>Remedies are agreed between the investigator, their line manager and Customer Relations and we have published compensation guidelines which have come directly from Housing Ombudsman Service.</p> <p>The line manager also carried out a check on the complaint response before it is sent to ensure that expectations are not falsely raised/ cannot be delivered or would cause unfairness.</p> <p>Stage 2 responses are checked by the line manager and Customer Relations Team Leader/ Manager.</p>

6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the Resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is covered in the Complaints Procedure and within the e-learning training. The Procedure explains that the complaint investigator must ensure that any proposed remedy is tracked to completion and if necessary, the resident kept up to date with progress.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a Resident has been put to as well as any distress and inconvenience caused.	Yes	Our Compensation Policy details how we will award compensation, compensation payments have been benchmarked within the sector. We also award compensation for loss of heating/ hot water to tenants, and we make home loss/ home disturbance payments. Our Compensation Policy has been reviewed and will be re-launched in Autumn 2023. It uses the Housing Ombudsman's Guidance on compensation/redress. Compensation amounts are considered and reviewed by the Customer Relation Team.
Best practice 'should' requirements			
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all Residents.	Yes	We monitor types of complaints and through the learning from complaints insight work we pick up themes and trends. With senior colleagues we look at what improvements or changes should be made. A full review of the way we deal with complaints is currently being considered by the director of Customer Experience and the appropriate stakeholders.

6.7	In some cases, a Resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	The Procedure and processes scope the involvement of in-house solicitors or our organisation's subject matter specialists (for example: leasehold/tenancy/ data protection/property).
Section 7 - Continuous learning and improvement			
Mandatory 'must' requirements			
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their Residents, staff and scrutiny panels.	Yes	<p>We produce an Annual Resident Report which is sent to all residents (who rent and own homes). This document is also published on our website. This report covers:</p> <p>Numbers of complaints, Types of complaints received (top 3 areas), Satisfaction with complaints Insight work (learning from complaints The work of the Independent Resident Complaints Panel Housing Ombudsman determinations.</p> <p>We provide regular reports (anonymised) about complaints activity and our learnings from complaints to involved residents (such as the Independent Resident Complaints Panel, Resident Scrutiny panel, Resident Council).</p> <p>Our main board and Executive Committee. Senior officer group committee meetings for both our housing and care service functions also receive such reports</p>

			as does our Service Quality Committee, (a designated sub-committee of our board).
Best practice 'should' requirements			
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Suki Jandu, Executive Director of Housing Services fulfils this role and has lead responsibility on Complaints within Anchor.
7.4	<p>As a minimum, governing bodies should receive:</p> <p>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</p> <p>Regular reviews of issues and trends arising from complaint handling,</p> <p>The annual performance report produced by the Ombudsman, where applicable</p> <p>Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</p>	Yes	The Service Quality Committee receive a quarterly report which includes all the items listed.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and Procedures that require	Yes	The Customer Insight Manager provides a quarterly insight pack for our Housing Services Committee, (the senior management group within our housing

	revision. They should also be used to inform staff and contractor training.		<p>service). This pack covers any trends over the quarter.</p> <p>The Customer Insight Manager holds review meetings to look at Rented and Home Ownership to run through the themes in deeper detail with senior management.</p> <p>Any changes to training, process, Policy, and Procedure are then picked up with the relevant Policy lead or owner of the training/ process or contract (if external contractors for example).</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <p>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</p> <p>take collective responsibility for any shortfalls identified through complaints rather than blaming others</p> <p>act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</p>	We meet this in part	<p>The Complaints Policy has a responsibilities statement which explains how we expect colleagues to handle complaints, it covers working collaboratively, co-operatively and taking collective responsibility.</p> <p>The Procedure explains to colleagues we will work across teams collaboratively and have a 'no blame' approach.</p> <p>The Complaints Policy has a responsibilities statement which explains how we expect colleagues to handle complaints, it covers working collaboratively, co-operatively and taking collective responsibility.</p> <p>The Procedure explains to colleagues we will work across teams collaboratively and have a 'no blame' approach.</p>

			<p>As a provider of Care and Housing the chartered Institute of Housing doesn't reflect the Care side of the business.</p> <p>We have our own Values and Behaviours which guide us in the way we work, how we interact with each other and how we serve the needs of our residents. Our values are embedded within induction, training, and performance management processes.</p> <p>In last year's Self-Assessment, we made a commitment to explore the use of a standard objective for specific colleague roles. We have now introduced an objective for operations managers around complaint handling/ oversight of complaints within their teams.</p>
Section 8 - Self-assessment and compliance			
Mandatory 'must' requirements			
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We have carried out a published Self- Assessments against the code then in place for 2020, 2021, 2022 and this will be our fourth.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in Procedures.	Yes	The Customer Relations Manager will ensure this happens.
8.3	Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-	Yes	<p>We have sought approval from the Service Quality Committee (Governing Body) prior to publishing this Self-assessment and previous ones.</p> <p>We publish the Self-Assessment on our website and reference it within the Annual Resident Report (issued</p>

	<p>assessment outcomes should be reported to elected members</p> <p>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to Residents</p> <p>include the self-assessment in their annual report section on complaints handling performance</p>		<p>autumn 2023) it details where the Self-Assessment can be viewed (on the Website). The Housing Ombudsman confirmed that this was sufficient.</p> <p>Due to the size of the Self-Assessment, it isn't cost effective to include fully within the Annual Report.</p>
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