

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Mandatory 'must' requirements are unshaded and best practice 'should' requirements are shaded

Section 1 - Definition of a complaint			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: <i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	We adopted the Housing Ombudsman's definition of a complaint when the code was first introduced in July 2020. The definition is included in our Customer Complaints and Feedback Policy here .
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	To demonstrate compliance with the first part of this requirement, see evidence provided in section 1.2 above. Compliance with the second part is included in our Customer Complaints and Feedback Policy here (items 21 and 22 page 8).
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. Extract from the Complaint Handling Code A service request is a request from a resident to their landlord requiring action to be taken to put something right. Service requests should be recorded, monitored, and reviewed regularly. A complaint should be raised when the resident raises dissatisfaction with the response to their service request.	Yes	The new guidance provided by the Housing Ombudsman to landlords to enable them to distinguish a service request from a complaint has been uploaded to Plus Dane's Intranet and will be used when training colleagues and complaint handlers. This guidance is also included in our 'Complaint Handling Best Practice Guidance'.
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	Customers responding to end of process satisfaction surveys are able to express dissatisfaction. Individual teams are responsible for contacting the customer to determine what is required to resolve the issue and if appropriate it may be logged as a complaint.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	See 1.5 If at stage 1 then complaint will progress to stage 2 if issues are outstanding. Dissatisfied comments are reviewed and 11 have notes on Delighted system where further action is required.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We accept complaints unless there is a valid reason not to do so. Our Customer Complaints and Feedback Policy here in section 7 clearly sets out the circumstances in which a matter will not be considered. Further information for colleagues is included in the 'Complaint Handling Good Practice Guidance'
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	Our Customer Complaints and Feedback Policy here clearly sets out the circumstances in which a matter will not be considered, and these circumstances are fair and reasonable to residents. <ul style="list-style-type: none"> • The issue is a service request. • The matter has already been dealt with under the complaint process. • The issue giving rise to the complaint occurred over 6 months ago and it is not a health and safety or safeguarding issue. • Legal proceedings have started, and the details of the complaint or claim have been filed at court.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	If Plus Dane decides not to accept a complaint it is in accordance with the exclusions noted in 1.7 above from our Customer Complaints and Feedback Policy here – a standard letter template is used to ensure compliance with this requirement which is consistent and sets out a clear explanation to the customer detailing the reasons why the nature of their complaint is not suitable for the complaint process. In this letter we also communicate to the customer their right to take our decision to the Housing Ombudsman.
-----	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Section 2 - Accessibility and awareness			
Code section	Code requirement	Comply Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Compliance is demonstrated in our Customer Complaints and Feedback Policy here . This includes an online form on our website. We have just introduced a new Customer Portal where complaints can be registered and reference to this will be included in section 8 of the policy during the 2023/24 policy refresh review.
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Compliance is demonstrated in our Customer Complaints and Feedback Policy here which specifically references social media. On receipt of complaints received via this method the communications team, email complaints@plusdane.co.uk to enable CRT to log and acknowledge the issue.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	The complaints section of our website includes our policy and leaflet . Printed copies can be issued on request, and we can arrange to alter the formats for further accessibility if required. The information includes our two-stage process.
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	The complaint process is easy to find on our website , customers can type 'complaints' in the 'search' facility and then click on 'feedback and complaints'. Or from the home page, customers can click on 'contact us' and then 'feedback and complaints' which is the first option to choose from when the screen is presented.
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	We have an accessible complaint procedure which complies with the Equality Act 2010. All colleagues within Plus Dane undertake annual mandatory training through a bespoke e-learning 'The importance of equality, diversity & inclusion' module. Colleagues are made aware of their compliance requirements through the Customer Complaints and Feedback Policy here .
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	One of the many ways in which Plus Dane publicises the complaint policy and process is through Unity magazine . Published in the spring, summer, and winter each year. We regularly include the complaints process infographic which includes the Housing Ombudsman after the final stage.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 2 - Accessibility and awareness			
Code section	Code requirement	Comply Yes/No	Evidence, commentary, and any explanations
			<p>We have a page dedicated to complaint handling on our website, which includes our policy, self-assessment against the code and the HOS scheme.</p> <p>The 'Housing Ombudsman's contact details' poster has been placed on notice boards throughout our schemes.</p> <p>Other methods</p> <ul style="list-style-type: none"> • Printed complaint leaflets are available on request. • Customer facing colleagues provide complaint handling information to customers on request or where it is evident that something has not gone as well as expected. • We refer to our Customer Feedback and Complaints Policy in our other corporate policies. • We engage with our customers during scrutiny and policy reviews, and we listen to customers feedback in general. • We also record comments and compliments and use this valuable source of information to improve services for our residents.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Plus Dane has template complaint handling letters for stage 1 and 2 acknowledgements, stage 1 and 2 responses and a complaint rejection letter which include the standard paragraphs recommended by the Ombudsman to comply with this requirement.
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	This advice is on our website and it is communicated to customers in our complaint acknowledgement letters. Where we have decided not to accept a complaint this information is included in the complaint rejection letter.

Section 3 - Complaint handling personnel			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer."	Yes	Plus Dane's Customer Relations Team (CRT) is responsible for ensuring that a responsive, professional, quality, and compliant complaint handling service is always provided to all customers. Annual report to Board is presented as well as quarterly performance information to Purpose Committee.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>Plus Dane operates a service led approach to complaint handling, new managers receive training on the requirements of the complaint handling code and internal complaint policy and process as part of their induction. Existing managers meet quarterly training with CRT.</p> <p>In addition, CRT have the autonomy to resolve complaints if the investigating officer or service requires additional help, support, and guidance or if the officer assigned to a case is unavailable to investigate the customers concerns and respond within timescale, CRT will offer assistance on these occasions.</p> <p>Any conflict of interest is considered when complaint is assigned, for example if the complaint is about a colleague, then it will be assigned to</p>

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 3 - Complaint handling personnel			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			their manager.
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>Plus Dane complaint handlers are equipped to meet the requirements listed at 3.3 by:</p> <ul style="list-style-type: none"> • attending quarterly training/guidance sessions delivered by CRT. • Training by the CRT is also offered to new managers. • The colleague who has dealt with the issue is not asked to carry out the investigation into the complaint, but they may be asked to contribute to the investigation.

Section 4 - Complaint handling principles			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedures within five days of receipt.</p>	Yes	<p>All colleagues in Plus Dane are required to update a customer's record in our CRM system (Cx). This is following an interaction, communication through any channel, action being taken or when planning an action for a customer. Plus Dane colleagues are aware of the requirement to log a formal complaint where it becomes clear their efforts to resolve a concern have not reached a resolution satisfactory to the customer. We do not operate an informal stage 0; we consider this to be a service request following the introduction of the code. We operate a two-stage approach to complaint handling (1 and 2). On receipt of a complaint colleagues use the CRM 'report a complaint' case in Cx, complete the details of the complaint and desired outcome. The case is assigned to CRT, to assess, log and acknowledge the complaint. This case in Cx enables CRT to track complaints and ensure they are recorded and acknowledged at stage 1 within the 5-working day target timescale.</p> <p>Volume of complaints formally acknowledged in 5-working days by CRT:</p> <ul style="list-style-type: none"> • 2022/23 Q4 = 82% • 2023/24 Q1 = 90% • 2023/24 Q2 = 90% <p>Where we have failed to log and acknowledge a complaint formally in timescale we apologise to the customer and in the majority of cases complaints are approximately 1-2 days over the 5-working day target. If a customer submits a complaint direct to complaints@plusdane.co.uk they will receive an auto acknowledgment reply.</p>
4.2	<p>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.</p>	Yes	<p>CRT log all complaints and if unclear on the reasons for the complaint they contact the customer to clarify the problem and agree the outcome being sought.</p> <p>Our complaint acknowledgment letter captures this information clearly, and we ask customers to tell us if our summary of their concerns captures the nature of their complaint appropriately. This information is shared with the investigating officer to provide them with a clear understanding of the problem and outcome the customer is seeking.</p>

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 4 - Complaint handling principles			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Our process and procedures require that all complaint investigators should contact complainants at the start and during their complaint to: <ol style="list-style-type: none"> 1. Ensure they understand the complaint from the customers point of view. 2. Set clear expectations from the start 3. Understand what is required to put things right. 4. Keep customers up to date with progress. We also take the opportunity to set clear expectations in our stage 1 complaint acknowledgement and response letters to customers.
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	We encourage complaint investigating officers to contact our customers as soon as the issue comes to their attention. When CRT assigns a complaint, the email we send to the investigating officer contains the following guidance: <ul style="list-style-type: none"> • Contact the customer as soon as possible (phone or visit) to understand the concerns from their point of view • Ask what outcome the customer is seeking • Manage the customers' expectations from the outset • Take action / resolve the problem at the first opportunity • Investigate what went wrong • Identify lessons learnt and implement the improvements • Agree the outcome with the customer • Draft the response • Email to CRT to review and issue the response 10.2% of complaints escalated to stage 2 and 0.7% to the Housing Ombudsman in 22/23
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	We are happy to deal with customers representatives and facilitate meetings where appropriate as long we have received third party authorisation to do so, this is detailed in our Customer Complaints and Feedback Policy here .
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	It is a requirement of all complaint investigating officers to investigate complaints impartially. To comply with this essential element of the code, complaints are assigned to officers who had not been involved in the issue directly. If an officer has been involved in the case, they will be asked for information/evidence as part of the on-going investigation into the complaint. If CRT believe that the complaint has not been handled impartially or there is a conflict of interest, the issue will be escalated to the manager of the service involved in the complaint.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	These requirements are included in our Customer Complaints and Feedback Policy here and in our 'Complaint Handling Good Practice Guidance.' which are issued to all complaint investigating officers and service managers. <p>CRT reminds complaint handlers of these requirements when assigning complaints and during quarterly complaint handling meetings.</p> <p>CRT reviews all responses issued to customers to ensure these practices are adhered to by complaint investigating officers.</p>

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 4 - Complaint handling principles			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	This requirement is included in our 'Complaint Handling Good Practice Guidance,' which has been issued to all investigating officers and is available on our intranet. This requirement will also be included in the e-learning module that is still in development along with other good practice guidance and requirements of the code.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We endeavour to adopt this practice; on some occasions it may be appropriate to refer to a colleague by name and role for clarity. This guidance has been included in our 'Complaint Handling Good Practice Guidance,'. This requirement will also be included in the e-learning module that is still in development.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This guidance has been included in our 'Complaint Handling Good Practice Guidance,'. This requirement will also be included in the e-learning module that is still in development along with other good practice guidance and requirements of the code.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is a requirement of our complaint process, the guidance has been included in our 'Complaint Handling Good Practice Guidance.' This requirement will also be incorporated into the e-learning module that is still in development, along with other good practice guidance and requirements of the HOS code and CIH professional standards in complaint handling.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	As part of the investigation the officer will speak to any relevant parties, either customers or colleagues to ensure that a rounded response. If a complaint involves a colleague, they are always given the opportunity to put across their understanding of the issue and problem. Reference is made to this in our complaint policy. If it is not appropriate to discuss the outcome of any action against a colleague with the customer a reference to this will be included in the response. When there is a reference to another customer this will usually be as part of an ongoing ASB case which is dealt with as part of our routine tenancy management processes.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Compliance with this requirement is demonstrated in our Customer Complaints and Feedback Policy here .
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	This requirement is included in section 14 of our Customer Complaints and Feedback Policy here . Clear and valid reasons for not accepting or declining to escalate a complaint are: <ul style="list-style-type: none"> • The issue is a service request. • The matter has already been dealt with as a complaint • The issue occurred over 6 months ago, and it is not a health and safety or safeguarding issue. • Legal proceedings have started, and the details of the complaint or claim have been filed at court.
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	Yes	We record details of all complaints in our Housing Management System (Cx Customer Feedback Module). We have the functionality to upload attachments and other relevant information to a customer's case. Our responses to complaints are also held electronically on our housing management system.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 4 - Complaint handling principles			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
	prepared.		We use the data from the complaint to inform learning and gauge performance on how the complaint service is performing.
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	We seek feedback from our customers in relation to satisfaction with complaint handling. Delighted conduct end of process transactional surveys via text or email following a complaint being closed in our Customer Feedback system. These measures are monitored through Operational Performance Indicators: <ul style="list-style-type: none"> • % of customers satisfied with the handling of their complaint is 34% at end of 22/23 based on 20% response rate. • % of customer's satisfied with outcome of their complaint 80% at end of 22/23 based on a low response rate of just 5 surveys. We use the feedback to encourage a positive complaint and learning culture and to inform improvements to the complaint handling experience for our customers. Feedback is shared with the complaint resolution manager where appropriate.
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	Our Customer Complaints and feedback policy aims to: <ul style="list-style-type: none"> • focus on putting things right as quickly as possible • learn from positive and negative feedback to drive service improvements • create a positive complaint handling culture amongst staff and residents. A key focus of complaint handling is the learning gained when things have not gone as expected. Each quarter CRT meets with investigating officers where learning from complaints is an item on the agenda. There is a prompt for colleagues to consider learning included in our standard suite of complaint handling letters. When letters are reviewed by CRT the learning opportunities are logged where appropriate and discussed with the complaint handler and implemented if they are quick fixes. If not, they will form part of a bigger improvement plan.
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	To support customers and colleagues we have an unreasonable behaviour framework which is available on our website. The framework will undergo a refresh during the 2023 customer complaints and feedback policy review.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	We demonstrate compliance with this requirement in our Unreasonable Behaviour Framework. Before applying restrictions to a small minority, we consider individual circumstances and the impact any restrictions of contact may have on a customer.

Section 5 - Complaint stages – Stage 1			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	Plus Dane aims to respond to all stage 1 complaints within 10 working days. This is explained in our policy at item 13. A complaint will not exceed a further 10 working days without good reason. We monitor compliance of this timescale through operational performance indicators using data from our Cx system.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 5 - Complaint stages – Stage 1			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			<p>If CRT extend a complaint, the complaint is placed on hold and a formal letter is issued to the customer using examples of a 'good reasons' for extending a complaint as per the HOS code:</p> <ul style="list-style-type: none"> • a delay by a third party, over which we have no control • we require more time to undertake interviews • we need longer to acquire all the information required from multiple sources to enable us to investigate your long-standing / complex case • you have asked us for more time to enable you to submit further information in support of your complaint.
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	On the occasions where we need to extend a complaint beyond a 20-working day timescale we agree this with the customer. At the same time, we would agree a communication plan to ensure the customer is updated with progress during this time. CRT monitor cases that have been placed on hold to ensure they are completed by the agreed due date and also ask the service for regular updates and ensure details of which are recorded in the system.
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	The Housing Ombudsman's details are included in our suite of letters.
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	Complaint investigators are given guidance on complaint handling through a number of sources. The complaint responses we issue are always structured and they include details of: <ul style="list-style-type: none"> • What went wrong (background summary) • What we have done to put things right • The outcome • Learning
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	<ul style="list-style-type: none"> • We always aim to send complaint responses to our customers by the target response date, and we include details of the follow-on work required in our communications at stage 1 and stage 2. • 2022/23 Performance: <ul style="list-style-type: none"> ○ 93% of responses issued in target at stage 1 ○ 80% of response issued in target at stage 2 • Complaint investigators maintain contact with customers until their issues have been resolved and keep CRT updated with progress. • Following a response being issued CRT closes the complaint stage in the system for reporting purposes, but the complaint remains open until either: <ul style="list-style-type: none"> ○ The 10-day escalation timescale period has expired, or ○ Follow-on actions or outstanding work promised following the complaint has been completed.
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	Our complaint responses are structured to comply with this requirement, and address each of the points raised in the main body of our response letters which includes an explanation should we not be able to agree to some requests for a service that are outside our landlord obligation or the terms of the law.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Section 5 - Complaint stages – Stage 1			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	We have adopted this requirement by including it in our Policy and Complaint Handling Best Practice document
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: the complaint stage <ul style="list-style-type: none"> 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	Compliance with this requirement is demonstrated through a structured standard stage 1 response letter template covering the issues required. CRT reviews each response before it is issued to ensure this approach is followed, we check to make sure that the response is clear and jargon free in line with our organisational tone of voice. The response is structured and includes: <ul style="list-style-type: none"> A summary of the background into the concerns Details of what has gone wrong (if anything) The decision (including the reasons why this conclusion was reached) The remedy Follow on actions Learning How to escalate the complaint to the next stage

Stage 2			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	The majority of cases where the customer remains dissatisfied move to stage 2 of our complaint process to ensure the customer receives a considered and definitive response to their concerns. During 22/23 we rejected 5 cases mainly because the issues were significantly over six months old. None of these rejected cases were subsequently presented to the Ombudsman. In instances where we decline to escalate a complaint, we communicate this in writing including the residents right to approach the Ombudsman about its decision.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Following receipt of an escalation request we: <ul style="list-style-type: none"> Contact the customer to acknowledge receipt to ensure that we fully understand the reasons why the complaint remains unresolved. Send a stage 2 acknowledgement letter in which we ask the customer to confirm our understanding of the complaint.
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	Our stage 1 complaint response and policy asks the customer to contact within 10 working days to escalate their complaint. If their request falls outside of this timeframe, we will usually accept the request. If we have contact but the escalation request is not clear, CRT we will contact the customer to ask them to confirm the reasons for remaining dissatisfied. We also ask customers to clarify the reason for escalating their complaint in our stage 2 complaint acknowledgement letter.
5.12	The person considering the complaint at stage two, must not be the same person that considered the	Yes	Our policy states this requirement on item 14 page 7: which says that the review will be carried out by a head of service or director who has

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Stage 2			
Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
	complaint at stage one.		not been involved in dealing with the original complaint.
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	We aim to provide a final written response to a complaint following a stage 2 review within 20 working days. If there is a reason, we cannot achieve this timescale we will agree the response timescale with the complainant and will not exceed the additional 10 working day extension timescale without good reason. As 5.1 above a good reason for extending a complaint has been taken from the Housing Ombudsman's Good Practice Guidance.
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	If we are to exceed the 10 working days extension we will agree this both verbally and in writing. If verbally this is followed up in writing.
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	The HOS details are included in our complaint extension standard letter template. This enables us to communicate consistently with our customers at each stage of the process.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	Yes	We operate a two-stage complaint process, with stage 2 being the final stage before escalation to the Housing Ombudsman. Our stage 2 complaint response letter template enables consistent communication of the outcome of complaints at the final stage of our internal complaint process to ensure that we remain compliant with the requirements of this section. Our stage 2 responses are written in clear, plain language and they include: <ul style="list-style-type: none"> The complaint stage and reference number A summary of the complaint and the outcome being sought A summary of the review. The conclusion which includes our decision and the reasons why we have reached this outcome. Details of any remedy or solution offered to put things right A summary of outstanding actions Details of any lessons learnt Details of what steps the customer can take next, take their complaint to the HOS.

Stage 3 – Not applicable to Plus Dane's complaint policy and process

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Our complaint procedure consists of two stages only. This ensures the complaint process is not unduly long for our customers.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	n/a	n/a
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	n/a	n/a
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	n/a	n/a

Section 6 - Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	We are compliant with this requirement see item 15 Page 7 of our Customer Complaints and Feedback Policy here .
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We are compliant with this requirement see item 15 Page 7 of our Customer Complaints and Feedback Policy here . We have a compensation framework that sets out the grounds when we will award any redress. Complaint investigators set clear expectations with our customers from the start and during the complaint process (see complaint handling and good practice guidance).
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	CRT reports trends in complaints to service managers as they occur and during discussions in meetings about complaints and lessons learnt. These may include seasonal issues such as an increase in the number of complaints being received. An example of this is an increase in gardening service in the summer months and complaints about heating in the winter months. This gives Plus Dane the opportunity to increase communications in these areas to set up

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
			customers' expectations and put right issues quickly before they escalate into complaints.
6.4	<i>Missing from code</i>		
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	We structure responses to clearly set out the outcome, proposed resolution or remedy in the 'conclusion' section of our responses. We also record in this section if we have upheld the complaint. We record details of any failure, any redress offered and an apology. CRT monitors follow up actions through the complaint recording system and only close cases formally once the outcomes or processed remedies have been completed. Once a complaint is closed formally in the complaint recording system a survey will issued to understand if: <ul style="list-style-type: none"> the customer is satisfied with the outcome of their complaint. and, if they are satisfied with the handling of their complaint.
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	Guidance for complaint resolution managers is set out in the 'Compensation Framework' which must be read in conjunction with the Customer Complaint and Feedback Policy here . See item 17 page 7.
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	In these cases, we will refer to our legal representatives for advice. If our obligation to pay redress is not clear, we will seek advice on how resolutions should be worded. CRT has access to a budget for seeking legal advice. The resolution will be communicated to the customer at appropriate points.

Section 7 - Continuous learning and improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.1	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes, the quality of the service provided, the ability to learn and improve, and the relationship with their residents. The Ombudsman encourages landlords to use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	We have adopted a positive complaint handling culture through our policy which is based on achieving a positive outcome for our customers and learning when things go wrong. The establishment of our CRT that we have a dedicated group of colleagues who are focused on delivering a quality response in a timely manner. We take a business led approach to complaint handling meaning that the people best placed to understand the complaint and with existing relationships with the customer work with them to resolve the matter. We take a transparent approach to complaint handling with a daily update being sent to all complaint handlers in the business. We have a lessons learnt framework in place where learning can be recorded and monitored.
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	We produce a 'Complaint Handling Annual Summary' which includes lessons learnt and service improvements, additionally the 'Corporate Annual Report' includes complaint data and details of learning and improvements. This is available on our website. Our new customer group known as the Customer Assurance Panel (CAP) has oversight of complaints written into their terms of reference to ensure that there is a customer angle to monitoring the outcome of complaints.
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	Yes	The Deputy Chair of Purpose Committee has been nominated as the lead for complaints and is fully engaged with this process.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

	provides insight to the governing body on the landlord's complaint handling performance.		
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, the annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. <p>The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</p>	Yes	The annual complaints report for 2022/23 was submitted to Board in May 2023 with this self-assessment being presented in November 2023.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	<p>The Director of Customer Service and CRT meet with senior managers on a regular basis to discuss complaint trends and learning, additionally trends and systemic issues are highlighted to senior managers when they become apparent, any issues are fed back to colleagues and contractors as they arise.</p> <p>Complaints are discussed at contractor management meetings facilitated by the senior managers responsible for managing contracts and contractors.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. take collective responsibility for any shortfalls identified through complaints rather than blaming others. act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>This standard objective to complaint handling for all colleagues is set out in our Corporate Customer Feedback and Complaints Policy and forms the basis of complaint handling within Plus Dane.</p> <ul style="list-style-type: none"> We have a collaborate approach to complaint handling across all of our services (work together is one of our corporate values) We operate a no blame complaint handling culture and take collective responsibility for complaints (take ownership and achieve for our customers are also included in our corporate values) We act in accordance with the professional standards for engaging with complaints and the HOS code. <p>The Code and Professional Standards form the basis of complaint handling in Plus Dane and the guidance will be used to inform our mandatory complaint handling e-learning module which is currently in development.</p>

Section 8 - Self-assessment and compliance

Code section	Code requirement	Comply Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This document demonstrates compliance with this requirement for fiscal year 2022/23.

Plus Dane Housing IHO Complaint Handling Code Self-Assessment November 2023

8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We will comply with this requirement if a notable change or restructure presents or change in procedure presents before the next assessment is due.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>Following this self-assessment we will:</p> <ul style="list-style-type: none"> • Report the outcome of this assessment to Board in November 2023. • Publish the self-assessment on our website to make it accessible to our customers. • Include a reference to this self-assessment in our 'Annual Report' on Complaint Handling performance.