

Housing Ombudsman Complaint Handling Code:

Self-assessment form

Compliance with the Complaint Handling Code			
1	Definition of a complaint	Yes/No	Comments – wording in policy
	<p>Does the complaints process use the following definition of a complaint?</p> <p><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></p>		<p>The policy applies to Swan Housing Group and its subsidiaries, which include Swan New Homes (NU Living), Swan Care and Hera Management Services.</p> <p>Contractors and other partners working on the group's behalf must also adhere to the policy.</p> <p>Section 4 of the Complaints Procedure does use the exact Ombudsman definition of a complaint.</p>
	<p>Does the policy have exclusions where a complaint will not be considered?</p>		<p>There are several instances when we will not consider a customer complaint under this policy. These include:</p> <ul style="list-style-type: none"> • Old complaints that have had a final response and there is no new evidence or information available. • An initial request for a service or information. Customers are asked to follow the correct procedure and can only make a complaint if we fail to deliver the service or information requested. • Anti-social behaviour will be dealt with under the Hate Crime and Anti-Social Behaviour Policy. • Lettings decisions will be dealt with under the Allocation Policy. • Service charge disputes will be dealt with under the Disputes Procedures or referred to the First-tier Tribunal. • When legal action has commenced the relevant Head of Service will liaise with Swan's legal advisors. • Insurance related claims will be dealt with by the Head of Insurance. • Complaints against individual members of staff will be recorded and dealt with by the Line Manager and supported by the People Team where appropriate

	Are these exclusions reasonable and fair to residents? Evidence relied upon		The exclusions are reasonable. Customers have the right to be heard, understood and respected. If a customer makes unreasonable demands it may be appropriate to consider if a family member, friend or support worker are able to represent the customer in the handling of their complaint. Unreasonable behaviour could include: <ul style="list-style-type: none"> • Unreasonable demands, such as requesting large amounts of information not relevant to the complaint or refusing to speak to an individual member of staff. • Unreasonable persistence, continuing to raise the same subject without new evidence, continually raising the same issue or continuously changing the issue. • Verbal abuse, aggression, violence, including derogatory remarks or rudeness. • Overload of letters, calls, emails or contact via social media.
2	Accessibility		
	Are multiple accessibility routes available for residents to make a complaint?		Complaints can be made on-line, in person, by letter, email, telephone, social media or live chat. All contact methods are clearly set out on the 'Contact Us' section of the Swan website.
	Is the complaints policy and procedure available online?		A Complaint statement is available on-line detailing our commitment to customers and the various stages around making a complaint.
	Do we have a reasonable adjustments policy?		Reasonable adjustments are included in the Customer Service Policy.
	Do we regularly advise residents about our complaints process?		Reference to the complaint process is available on website, tenant handbook, service standards, complaint statement.
3	Complaints team and process		
	Is there a complaint officer or equivalent in post?		Head of Customer Relations, Customer Relations Manager who leads on complaints and Customer Relations Team in post.
	Does the complaint officer have autonomy to resolve complaints?		Yes, low-level complaints are resolved informally, serious complaints are responded to by the Manager responsible for the service
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?		Yes, liaises with all departments across the group to co-ordinate the resolution of complaints and ensure responses are timely and address the issue(s) raised

	If there is a third stage to the complaint's procedure are residents involved in the decision making?		No, Swan moved to a 2 Stage Complaint Procedure in line with Housing Ombudsman Guidelines in June 2020.
	Is any third stage optional for residents?		No optional third stage.
	Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?		Yes, we use the Housing Ombudsman template for responses, they include text: <i>You are entitled to refer your complaint to the Housing Ombudsman Service, Exchange Tower, Harbour Exchange Square, London, E14 9GE, www.housing-ombudsman.org.uk or 0300 111. The Housing Ombudsman is unable to consider cases until eight weeks after our final response. During that period you may, if you wish, contact a 'Designated Person' who may be able to help you to resolve the complaint or can refer your complaint on to the Housing Ombudsman Service. A designated person can be an MP, a local councillor, or a tenant panel. Swan does not have a designated tenant panel.</i>
	Do we keep a record of complaint correspondence including correspondence from the resident?		Yes, complaints are assigned a case number and all correspondence is kept and saved as part of the case
	At what stage are most complaints resolved?		Informal
4	Communication		
	Are residents kept informed and updated during the complaints process?		Yes, all complaints are logged on a central database, and monitoring is in place to keep in regular contact until the complaint has been resolved
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?		At each stage complainants are invited to advise us of what they would like as an outcome before we issue a final decision
	Are all complaints acknowledged and logged within five days?		100% of complaints are acknowledged within 2 days and responded to within 6 working days
	Are residents advised of how to escalate at the end of each stage?		Yes, all letters include details of how to escalate at each stage of the Complaints Procedure

	What proportion of complaints are resolved at stage one?		88% of complaints are resolved at stage 1
	What proportion of complaints are resolved at stage two?		94% of complaints are resolved at stage 2
	What proportion of complaint responses are sent within Code timescales? <ul style="list-style-type: none"> • Stage one • Stage two 		100% Stage 1 100% Stage 2
	Where timescales have been extended did we have good reason?		Generally there are no timescale extensions required, but if they occur such as complicated repair / maintenance issues, then the customer is notified and the extension time mutually agreed.
	Where timescales have been extended did we keep the resident informed?		Yes, the Customer Relations Team maintain contact throughout the process
	What proportion of complaints do we resolve to residents' satisfaction		89% of complainants are satisfied with the outcome of their complaints
5	Cooperation with Housing Ombudsman Service		
	Were all requests for evidence responded to within 15 days?		Yes, received one Ombudsman investigation in 2019-20, and one request in 20-21. Both were responded to within 15 working days
	Where the timescale was extended did we keep the Ombudsman informed?		N/A
6	Fairness in complaint handling		
	Are residents able to complain via a representative throughout?		Yes, complaints received from a third party must include authorisation from the customer
	If advice was given, was this accurate and easy to understand?		Yes
	How many cases did we refuse to escalate?		We do not refuse to escalate complaints

	What was the reason for the refusal?		N/A
	Did we explain our decision to the resident?		N/A
7	Outcomes and remedies		
	Where something has gone wrong are we taking appropriate steps to put things right?		Yes, all decision to put things right are taken in conjunction and with agreement from the customer.
8	Continuous learning and improvement		
	What improvements have we made as a result of learning from complaints?		<p>Examples include:</p> <p>Introduced Learning Circle event where we take an emergency incident and review from Customer, Swan and Contractor perspective.</p> <p>Introduction of a dedicated leaks investigator to find leaks quicker by Axis.</p> <p>Amendments to our Out of Hours Emergency procedure as a result of recent Learning Circle event.</p> <p>Standardised text messages to customers as a result of an emergency incident at one of our blocks in 2021.</p> <p>Complaints Handling Caseload trial introduced</p>
	How do we share these lessons with: a) residents? b) the board/governing body? c) in the Annual Report?		<p>a) Home Magazine articles/customer committee</p> <p>b) Board Reports/Learning Circle outcomes shared with Directors</p> <p>c) Complaints Overview in Annual Report</p>
	Has the Code made a difference to how we respond to complaints?		Yes, changes made to our Complaints Procedure and letter templates are as a result of the new Ombudsman Complaint Handling Code. Complaint Handling Code training was also rolled out to over 100 members of Swan Staff in 2021.
	What changes have we made?		<p>Complaints procedure reduced from three stages to two</p> <p>Included statement on 'reasonable adjustment'</p> <p>Clarified when a concern will not be raised as a complaint to customers</p> <p>Complaint Code Handling Training for Swan Staff</p> <p>Learning Circle Complaint retrospective learning events introduced</p>