

## Foreword:

*“Following a review at the Customer Insight Committee held on 15<sup>th</sup> May 2024, I can confirm that all Committee Members were satisfied that the Complaints Handling Code is being adhered to and that Orwell are taking positive steps to learn and improve from their complaints. The Self-Assessment has been completed and provides assurance on how Orwell are adhering to the code’- Tom Brown, Member Responsible for Complaints, Board Member & Customer Insight Chair.”*

## Orwell Housing Complaints Handling Code-Self Assessment Form April 2024

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

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
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| 1.2            | A complaint must be defined as:<br><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>  | Yes              | This is set out in our Complaints and Compliments Policy within paragraph 4.1.          | Initial dissatisfaction is logged on our CRM system, if it cannot be resolved at the first point of contact a complaint will be logged.   |
| 1.3            | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. | Yes              | This is set out in our Complaints and Compliments Policy within paragraphs 4.2 and 5.2. | As above, also customers will always be asked if they would like a formal complaint logged.   |
| 1.4            | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be                 | Yes              | This is set out in our Complaints and Compliments Policy within paragraphs 4.5.add      | Service requests will be logged on CRM, if a customer is not happy an initial dissatisfaction will be logged, and the customer will be asked if they would like a formal complaint logged also. All expressions |

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|     | recorded, monitored and reviewed regularly.  |      |  | of dissatisfaction will be attempted to resolved at the first point of contact. We aim to resolve initial enquiries within two working days.  |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.  | Yes. | This is set out in our Complaints and Compliments Policy within paragraphs 4.6.  | Initially, an initial dissatisfaction with the service will be logged, however a customer will be asked if they would like a formal complaint to be logged. We will ensure we continue to address all service requests regardless.  |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes  | This is set out in our Complaints and Compliments Policy within paragraphs 15.5. | Orwell uses transactional surveys to monitor customer satisfaction with several services including repairs, if negative feedback is received it is escalated and followed up by our customer insight and engagement team. Information on how to complain is published online and on relevant letters sent to customers. |

## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
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| 2.1            | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits   | Yes              | This is set out in our Complaints and Compliments Policy within paragraphs 5.1         |                          |
| 2.2            | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> </ul> | Yes              | This is set out in our Complaints and Compliments Policy within paragraphs 8.1 and 8.2 |                          |

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|     | <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>  |     |   |  |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.   | Yes | We do not stipulate a time period within our Complaints Policy and Procedure and will accept a complaint where the issue is over 12 months old. |  |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | This is set out in our Complaints and Compliments Policy within paragraphs 8.2  |  |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | This is set out in our Complaints and Compliments Policy within paragraphs 8.1 and 8.2  |  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes              | This is set out in our Complaints, Compliments and Compensation Policy within paragraph 6.1. and section 14.   | Customers can complain online, face to face, by telephone, via the online app or portal, social media and in writing (letter or email). |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.   | Yes              | This is set out in our Complaints, Compliments and Compensation Policy within paragraph 6.1.   | All front line staff have mandatory complaints training as part of their e-learning and all leaders have complaints handling training.  |
| 3.3            | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.  | Yes              | Orwell report our annual complaints on our website. Complaints are reported through our customer insight committee that meet quarterly and are reported to board. Monthly reports of complaints are sent to all leaders. |   |

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| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website. | Yes | Our Complaints and Compliments Policy is available on our website. Customers can also request a paper copy, an easy read option if required, and the read aloud function can be used online. Our policy details the stages of our procedure, what happens at each stage, and the timelines for responses in Section 7 (paragraphs 7.1-7.6). |  |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.   | Yes | This is set out in our Complaints, Compliments and Compensation Policy within paragraph 18.1.   | The complaints policy and process are available online, as is the Ombudsman's Complaint Handling Code and our self-assessment of compliance with it and information about the Housing Ombudsman.<br><a href="#">Orwell's Website</a> |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.   | Yes | This is set out in our Complaints, Compliments and Compensation Policy within paragraph 13.1 and 13.2.  |  |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the   | Yes | This is included in stage one and two response letters. It is also covered when writing to acknowledge a delay in responding. This is set out in our  |  |

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|  | individual can engage with the Ombudsman about their complaint. |  | Complaints and Compliments Policy within paragraph 10.1. |  |
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## Section 4: Complaint Handling Staff

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 4.1            | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties. | Yes.             | We have a dedicated Complaints Officer. This is set out in our Complaints and Compliments Policy within paragraph 6.1.   |   |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes              | The Complaints Officer can award compensation of up to £100 as per our standing orders. The Complaints Officer has autonomy to resolve complaints and access any level of staff.   |   |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively                            | Yes              | All front-line staff have mandatory complaints training as part of their e-learning and all leaders have complaints handling training. We have a Complaints Officer and administrator who work full time on complaints giving us | Information about complaints, including lessons learned, is included in our Annual Report as well as published <a href="#">Orwell's Website</a> |

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|  |  |  | adequate resource. We report complaints monthly to leaders and to our Customer Insight Committee and Board members at each meeting. We have introduced a Organisational Wider Learning Log which enables us to review learning from complaints across the business this is frequently reviewed. |  |
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### Section 5: The Complaint Handling Process

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
| 5.1            | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.  | Yes              | Orwell has one Complaints and Compliments Policy. This is published on <a href="#">Orwell's Website</a> .   |                          |
| 5.2            | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Yes              | Orwell logs any failures or expressions of dissatisfaction as 'initial dissatisfaction' however this is purely to allow us to monitor this and to learn, it is not a part of our complaints process. Customers will always be asked if they wish to make a complaint. Our complaints process only has two stages. This is evidenced |                          |

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|     |  |     | within our Complaints and Compliments Policy and Procedure.   |  |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.   | Yes | Our complaints process only has two stages. This is evidenced within our Complaints and Compliments Policy. This is published on <a href="#">Orwell's Website</a> |  |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.7.  |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.7.  |  |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.6.  |  |

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| 5.7  | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.6. |  |
| 5.8  | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes | This is set out in our Complaints and Compliments Policy within paragraph 3.3  |  |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.5. |  |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 14.4 |  |

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|      | reasonable adjustments must be kept under active review.  |     |   |  |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.                            | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.3   |  |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | Yes | Orwell uses a CRM (Microsoft Dynamics) system to record all documentation which relates to complaints, all dates and correspondence is recorded.  |  |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.                                     | Yes | Colleagues are encouraged to resolve matters from the first point of contact and have the autonomy to resolve matters at any point in the process. This is covered off within staff training. It is also set out within our Complaints and Compliments Policy, paragraph 3.3. |  |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 12.1. Orwell has an   |  |

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|      | and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. |     | unreasonable behaviour and demands policy and procedure which covers this.          |  |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.      | Yes | This is covered within our unreasonable behaviour and demands policy and procedure. |  |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
| 6.1            | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes              | All complaints are dealt with on an individual basis and colleagues are encouraged and given the autonomy to remedy complaints as soon as possible. The complaints officer will consider the complexity of the complaint and any vulnerabilities will be considered. This is covered off within staff training. It is also set out within our Complaints and Compliments Policy, paragraph 3.3. | Orwell has a CHAT (Complaints Handling Assessment Team, made up of our customers, who review 10% of all complaints responded to within the last quarter. They are ensuring that we resolved complaints promptly, within our policy and procedure and that we showed empathy. The results of this can be found on our <a href="#">CHAT webpage</a> |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>  | Yes              | This is set out in our Complaints and Compliments Policy within paragraph 7.1.  |   |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Yes              | This is set out in our Complaints and Compliments Policy within paragraph 7.2.  |   |

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| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.5.        | All extensions will be agreed with our Customer and contact will be agreed via the Complaints Officer. |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.5.        |  |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.                                 | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.4. |  |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.3         |  |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and  | Yes | This is set out in our Complaints and Compliments Policy within 7.4.                  |  |



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|     | the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.  |     |  |  |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.2. |  |

### Stage 2

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage | Yes              | This is set out in our Complaints and Compliments Policy within paragraph 7.2 and 7.3. |                          |

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|      | 2 of the landlord's procedure. Stage 2 is the landlord's final response.  |     |  |  |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.2          |  |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 7.2 and 7.3. |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | This is set out in our Complaints and Compliments Policy within 7.3.                   |  |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes | This is set out in our Complaints and Compliments Policy within 7.3.                   |  |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | This is set out in our Complaints and Compliments Policy within 7.3.                   |  |

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| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.   | Yes | This is set out in our Complaints and Compliments Policy within 7.3.                  |  |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5. |  |
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5. |  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.2.        |  |

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|      | Service if the individual remains dissatisfied.   |     |   |  |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Orwell do not have any additional stages and all suitable colleagues involved when issuing responses. This is set out in our Complaints and Compliments Policy within paragraph 10.1. |  |

### Section 7: Putting things right

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|---|------------------|--|---|
| 7.1            | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> </ul> | Yes              | Our policy and procedure has been updated to cover this section and is now set out in paragraph 9.4. | Orwell has a compensation policy and procedure which has been written inline with the Housing Ombudsman guidance. |

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|     | <ul style="list-style-type: none"> <li>Changing policies, procedures or practices.</li> </ul>   |     |   |  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5. |  |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5. |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5. | Orwell has a compensation policy and procedure which has been written in line with the Housing Ombudsman guidance. |

## Section 8: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation   |
|----------------|--|------------------|---|--|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p>We publish our themes from learning to colleagues and customers in our annual report. We have introduced a customer Complaint Handling Assessment Team to scrutinise complaint handling on a quarterly basis. We also have a Customer Insight Committee who review Complaint Reports on a quarterly basis including learning. An annual report taken to our Board setting out information on complaints received that year, with a focus on key themes and areas for improvement. Orwell has a OWL (Organisational Wider Learning Log) which is accessible by all leaders and feedback and learning on individual cases is shared with colleagues on a case by cases basis as appropriate. The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a></p> | <p>Within 2023 Orwell received 183 complaints, 151 (82.51% were resolved at stage one, 27 resolved at stage two, 2 were escalated to the Housing Ombudsman. To date we have not received any findings of non-compliance from the Housing Ombudsman or any reports about our performance.</p> |

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| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.                       | Yes | The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a> | Approved by the Chair of Orwell's Customer Insight Committee- added to the top of this self-assessment. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes | The self-assessment is updated annually and following any Housing Ombudsman updates.                      |   |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes | This has not happened yet, however we would carry this out if required.                                   |   |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes | Orwell have a Business Continuity Plan for such circumstances which has been updated to include this.     |   |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 9.1            | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.   | Yes              | This is set out in our Complaints and Compliments Policy within paragraph 9.6.   |                          |
| 9.2            | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes              | We collect feedback from complaints through TSM's, transactional surveys, the complaints feedback itself and through CHAT. We publish our themes from learning to colleagues and customers in our annual report. We have introduced a customer Complaint Handling Assessment Team to scrutinise complaint handling on a quarterly basis. We also have a Customer Insight Committee who review Complaint Reports on a quarterly basis including learning. An annual report taken to our Board setting out information on complaints received that year, with a focus on key themes and areas for improvement. Orwell has a OWL (Organisational Wider Learning |                          |



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|     |  |     | Log) which is accessible by all leaders and feedback and learning on individual cases is shared with colleagues on a case by cases basis as appropriate. The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a> |  |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.   | Yes | As above.  |  |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Yes | This is the Director of Customers and Communities- Tony Long.  |  |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member                             | Yes | This is the Chair of our Customer Insight Committee and Board Member- Tom Brown.   |  |

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|     | Responsible for Complaints ('the MRC').   |     |  |  |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.  | Yes | A role profile has been set out for the MRC and is on the Customer Insight Committee. They have access through the Complaints Officer to any information requested and receive monthly and annual complaints reports as part of the board performance report and quarterly complaints reports. This information will evolve as we learn more about the data held and we grow our OWL (organisational wider learning log) | Currently Microsoft Dynamics (our CRM system) is not being used by the whole business for complaints, only by Customer Services. Once the whole business is using it, we will have more data which will assist as further in analysing data. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>b. regular reviews of issues and trends arising from complaint handling;<br>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and | Yes | As above.  | Housing Ombudsman complaints and outcomes are included on the complaints reports.  |

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|     | d. annual complaints performance and service improvement report.  |     |   |  |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | Yes | <p>One of Orwell's organisational values is 'collaborative.' As such, our culture and practice is to work co-operatively across teams and departments to resolve complaints. This requirement is also included in our code of conduct which every employee and board member signs annually.</p> |  |