

# North Star – Housing Ombudsman Complaint Handling Code - Self-Assessment Form 2022/23

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually. Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

## Section 1 - Definition of a complaint

### Mandatory 'must' requirements

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	Definition is used and stated in Para. 3 of the Complaints, Comments and Compliments Policy and included on the Complaints page on the website.
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	Not needing to use the word "complaint" is included in the Complaints, Comments and Compliments Policy and has also been emphasised during compulsory Complaints training completed in 2021. The policy and website states that a complaint can be made through a third party.
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	Section 6 of the Complaints, Comments and Compliments Policy gives guidance on how to deal with a chaser on a service request and dealing with the issues there and then and if not resolved offer to log the issue as a complaint. This was included in training during Sep/Oct 21. Additional training is to be carried out by Sep 23.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Included in Section 4 of the Complaints, Comments and Compliments Policy.
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	Section 4 of the Complaints, Comments and Compliments Policy states: <i>There may be circumstances where we do not accept a complaint or decide to deal with it in a different way to the normal process. Examples include:</i>

			<ul style="list-style-type: none"> <li>• When the service failure or incident occurred over six months from the complaint being made, unless it is a safeguarding or health and safety issue.</li> <li>• When repeated complaints are made about the same or related matters that we have already addressed.</li> <li>• Where legal action is being taken against North Star related to the complaint. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> </ul>
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	Policy states that we will write and explain why we are not accepting the complaint in Section 4. The letter will also include the Housing Ombudsman contact details.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	Complaints training is mandatory every two years. Case studies are used to clarify the difference. North Star has an service request system for issues that are sorted there and then and the tenant does not wish to complain. The service request system is used for learning and to identify any early trends or patterns and for operationally managing our contractors. Refresher training is being arranged by September 23.
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	Surveys are completed using the Rant & Rave platform. If the feedback is low, the Complaints and Performance Co-ordinator contacts the customer within two working days to gain further information and to try and resolve to the customers satisfaction. The customer would also be informed of the complaints process if still dissatisfied.

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

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	Customers can make a complaint over the phone, in person, by email, in writing or digitally through the website or via social media as well as by an advocate. This is explained in Section 3 of the Complaints, Comments and Compliments Policy. Regular articles are posted on social media informing customers how they can complain. Information on the website also gives details how a resident can complain.
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, Comments and Compliments Policy is published on the website for customers to view that explains each stage of the process. A summary guide to the procedure is also published on the website. We have strengthened the information on complaints on our website and moved to the front page to make more prominent for customers.
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 website includes a dedicated page for complaints, and this can be clearly accessed from a link on the main page. The page explains the procedure and includes the policy, complaints handling findings, the self-assessment against the code and a link to make a complaint online. Regular posts are made on social media informing customers how they can complain.
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	Section 5 of the Complaints, Comments and Compliments Policy covers how North Star will accommodate individual's needs. This includes providing additional support for customers with a learning or physical disability, providing correspondence in large print and interpreters. The policy states that a complaint can be made through an advocate and this is often used in cases from supported housing where a support worker will make a complaint

			on behalf of a customer. The "What if" guide is on the intranet to assist staff with contacting the Language Line interpreter service or contacts for assisting visually impaired customers depending on their communication preferences.
<b>2.6</b>	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	An article is regularly included in the tenant newsletter. The last newsletters (August and December 2022) covered how to complain, the process and the Housing Ombudsman's service. Regular posts are also made on social media informing customers how to complain. Information on how to make a complaint is also on our website and in offices.
<b>2.7</b>	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No	Contact information is provided at all stages of a complaint and is available on the complaints leaflet and website. Our letterhead has been reviewed and includes reference to the Housing Ombudsman.
<b>2.8</b>	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	Information on the Housing Ombudsman and contact details are provided at each stage and the acknowledgement letters for complaints. Details are also provided on the complaints leaflet and website page. An example paragraph on the information to include is provided in the policy. (Section 7).

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>2.2</b>	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	Section 3 of the Policy covers how complaints received via social media will be handled. The complainant will be invited to contact us privately with further details so the complaint can be handled correctly.

## Section 3 - Complaint handling personnel

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

<b>3.1</b>	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	The Complaints and Performance Co-ordinator is North Stars point of contact for complaints. The Co-ordinator records the complaints and holds all records and files. In their absence, the Business Support Officer provides cover. Complaints are reported to the governing body in the quarterly performance report. Complaints are investigated and responded to by the relevant service manager. The last training in complaint handling was July 2021. Additional training is due to be carried out by September 23 with findings and recommendations of CSS to be incorporated.
<b>3.2</b>	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Complaints and Performance Co-ordinator is an independent role in the Business Improvement Team and experienced in complaint handling.

### Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>3.3</b>	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	The complaints and performance co-ordinator is experienced in handling complaints and can deal with customers in a sensitive and calm manner. They have access to staff at all levels to ensure that complaints are responded to in a timely manner. The Service Managers dealing with complaints are also experienced in dealing with customers. They receive training at least every two years as well as having the autonomy and authority to resolve complaints quickly and around the needs of the complainant.

## Section 4 - Complaint handling principles

### Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

4.1	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 procedure within five days of receipt.	Yes	North Star has a two stage complaints procedure. When a complaint is made it is logged as a stage one and acknowledged within two working days (but usually the same day). Although North Star has a service request process this is for issues where a customer does not want to make a complaint but we want to record the issue and ensure it is resolved and for identifying any early trends or patterns as well as learning. This process does not obstruct customers wishing to make a complaint.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Section 7 of the policy states that the written complaints acknowledgement sets out our understanding of the complaint and the expected outcome that the customer is seeking. Clarification of the complaint and the outcomes the tenant is seeking is usually covered verbally when receiving the complaint then this will be included in the acknowledgement letter.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The service manager is responsible for investigating stage one of the complaints. This is investigated fairly and in an impartial manner. A review of how we handle complaints has been taken independently by Customer Service Solutions. The findings of this review are to be considered and incorporated into our processes. Stage two complaints are investigated by a Head of Service that has not been involved in the initial/stage one of the complaints.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	This can be evidenced in the quarterly peer review of complaints completed by an independent Head of Service from which findings and recommendations are provided. These items are also covered in the regular complaints training. All information relating to complaints is held by the Complaints and Performance Officer and information is only disclosed relating to the complaint or any learning from complaint.

<b>4.11</b>	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Officers will communicate with complaints via their preferred method of contact i.e., email, text, phone, etc and are kept up to date during the investigation.
<b>4.12</b>	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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	The complainant is contacted and given the opportunity to set out their complaint during the stage one investigation. Any staff member subject to the complaint will also be given the opportunity to be heard. The policy was amended in June 2022 to include ensuring that the complainant was given chance to comment on any adverse findings before the final decision was made.
<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The Complaints, Comments and Compliments Policy clearly states the timescales to escalate the complaint to stage two and after completion of this stage. These timescales are also stated on the final response letters at the end of each complaint stage.
<b>4.14</b>	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	Revised Complaints, Comments and Compliments Policy - June 2022 now includes this in section 7 under Stage two review and covers the same reasons for not accepting a complaint in the first instance.
<b>4.15</b>	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	The Complaints and Performance Co-ordinator keeps full records of the complaints including the original complaint and all correspondence and documents relating to the complaint. All complaints have a record sheet that records dates, key details, outcomes, and any learning from the complaint. These are stored electronically.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	North Star has an Unreasonable Customer Behaviour and Persistent Complaints Policy to manage any unacceptable behaviour from customers or their representatives. This was last reviewed in June 22.

#### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

<b>4.3</b>	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	North Star has a culture of being open and honest with customers and any unrealistic expectations of a complaint would be raised early on in a complaint so a realistic solution can be found. Training included how to give difficult messages to customers and to be clear from start about outcomes. A review of how we handle complaints has been independently carried out by Customer Service Solutions. This findings from this will be incorporated in a review of our processes and in staff training.
<b>4.4</b>	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	Complaints are generally resolved at the earliest opportunity to ensure that the matter is concluded for the complainant and meets the 10-day response target.
<b>4.5</b>	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	This is stated in the Complaints, Comments and Compliments Policy in section 3 on making a complaint and the policy has been updated to include this under the formal complaints section of the guidance.
<b>4.8</b>	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	We would quote relevant tenancy/applicable legislation.
<b>4.9</b>	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Communication would not generally identify individual members of staff or contractors unless they have been named and were a key part of a complaint.
<b>4.10</b>	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Officers do keep the complainant up to date during the complaint investigation as they usually need to speak to them and explain what action they are taking. This is included in Section 7 of the policy.
<b>4.16</b>	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	Rant & Rave text or telephone satisfaction surveys are completed following closure of a complaint and any feedback is used for learning. Customer satisfaction is a strategic risk on the risk register as part the Risk Management Framework. SMT receive monthly performance reports by exception.



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	Regular complaints and customer service sessions are provided for all staff to provide training on the complaints procedure and engage staff. Last training provided in Autumn 2021. Refresher training is due to be carried out by September 23.
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	If a restriction is placed on a customer contact due to behaviour, they would be informed of the reasons why and given a single point of contact through a method that would be accessible to them. This is included in the Unreasonable Behaviour and Persistent Complaints Policy and this policy is referred to at the start of the Complaints Policy. This was last reviewed in June 22.

## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> 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	The policy states within 10 working days and this is monitored as a KPI. The policy has been amended to specify any further extension should not exceed a further 10 working days. The Policy does state that any further extension after this requires authorisation from a Head of Service and must be agreed with the customer.
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	Although this usually happens there have been cases when the final response has been held until works have been completed therefore the policy has been amended to include this. The final response letters contain the date that any outstanding actions will be completed. Two new columns have been added to the Complaints Record to record where and the date any outstanding actions/repairs will be completed and a column to confirm they have been checked and marked as completed.

			This is an area that requires further strengthening and clarity with managers on how we handle complaints. Additional training including when a case is to be closed will be carried out by September 23.
<b>5.6</b>	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	Final response letters address all the points of a complaint and reasons for the decisions. Regular peer reviews are completed to ensure the quality of responses.
<b>5.8</b>	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	The Complaints Policy specifies what needs to be included in the final response letter to a stage one complaint in Para. 7. The policy agrees with the list stated in the requirement. Peer reviews check that responses contain these requirements. These findings are published on the website.

## Stage 2

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.9</b>	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 policy has been amended to include the reasons for refusing as set out in Section 3 of the policy. Refusing to escalate a complaint because of a merit assessment of the customers reasons for escalation or refusing to escalate because the customer is seeking to challenge an outcome that they had previously agreed to is unlikely to be considered reasonable.

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	The Complaints, Comments and Compliments Policy has been amended to include the outcomes the resident is seeking on the acknowledgement letter in addition to our understanding of the actions outstanding. The letters have been amended accordingly. Clarification of the complaint and the outcomes the customer is seeking is usually covered verbally when receiving 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	This is stated in the Complaints Policy and Procedures.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	The Complaints Policy states in para. 7 that the stage two complaint will be handled by a Head of Service/Executive Director.
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> 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	The Complaints Policy requires a response within 10 working days for stage two and complaints are monitored for this deadline. Similarly, to stage one, clarification on extension timescales has been added to the Complaints, Comments and Compliments Policy.
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"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul> <b>and</b> <ul style="list-style-type: none"> <li>if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	The Complaints Policy specifies what needs to be included in the final response letter to a stage two complaint in Para. 7. The policy agrees with the list stated in the requirement. Peer reviews check that responses contain these requirements.

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

<b>5.17</b>	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.	N/A	Not applicable as North Star's Complaints Policy was amended to a two stage process in January 2021 following review from the Housing Ombudsman Complaints Handling Code 2020.
<b>5.20</b>	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"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	N/A	Not applicable.

## Best practice 'should' requirements

### Stage 1

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.2</b>	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	The policy states that any further extension would be agreed with a customer on Section 7 - Stage One.
<b>5.3</b>	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 revised policy states that the customer should be provided with the contact details for the Housing Ombudsman if a revised timescale cannot be agreed and the complaint acknowledgement also includes the Housing Ombudsman contact details.
<b>5.4</b>	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	Any previous reports on an issue would be considered as background information to help resolve the customer's issue.
<b>5.7</b>	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	Further complaints that are received will be incorporated into the stage one complaint if they are relevant and the complaint is still ongoing. If the complaint has been closed it would be recorded as a new complaint unless it was progressing to a stage two.

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The policy states that any further extension would be agreed with a customer on Section 7 - Stage Two.
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 revised policy states that the customer should be provided with the contact details for the Housing Ombudsman if a revised timescale cannot be agreed and the complaint acknowledgement also includes the Housing Ombudsman contact details.

## Stage 3

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 <b><u>within 20 working days</u></b> 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	Not applicable as North Stars Complaints Policy was amended to a two-stage process in January 2021 following review from the Housing Ombudsman Complaints Handling Code 2020.
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	Not applicable.

## Section 6 - Putting things right

### Mandatory 'must' requirements

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	This is included in final response letters at both stages where the outcome of the complaint must be stated. This is included in para. 10 of the Complaints Policy. Letters apologise if things have gone wrong and actions taken to resolve it. Peer review of letters is completed to ensure responses meet the standard set.
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	The Complaints Policy sets out a remedy will be agreed with the customer and realistic timescales will be agreed depending on the nature and urgency of the issue. Remedies must also be in line with current policies.
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	Final response letters will state the actions or jobs raised to remedy an issue and set out the timescale or appointment time when this will be completed. The Complaints Record will record this and it will be monitored to ensure any outstanding actions are completed.
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	The Complaints Policy refers to the use of the Compensation Policy for any compensation awards which will include any statutory payments including Right to Repair. The policy also covers loss or damage to personal property. Payments for distress and inconvenience caused are also considered at the discretion of the investigating officer. The Housing Ombudsman's Guidance on Remedies document can also be used as a guide. The compensation policy was last reviewed June 22. A further review of the policy is to be completed with customers by September 23.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

<b>6.3</b>	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	This is considered during complaints and the complaints record sheet and complaints control sheet have a question on any changes to policy or procedure as a reminder to the investigating officer and records any actions to change processes/policies. This is an area that requires additional strengthening. A review of complaints handling has been carried out independently including learning and reviewing of processes. The outcome of this review will be captured within a review of complaints and training.
<b>6.7</b>	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	We would seek legal advice on any complaint that involved a legal entitlement. North Star has a framework of preferred legal partners on the wording of an offer.

## Section 7 - Continuous learning and improvement

### Mandatory 'must' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>7.2</b>	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	Quarterly complaints handling findings are published on the website for customers which provides an overview of complaints issues that quarter and any findings from the quarterly peer review of complaints. The Complaints and Performance Officer also attends a quarterly tenant's group where the Complaints summary is discussed with the involved tenants. The tenant annual report includes a section of the number of complaints received by service area and reasons including how many were upheld and feedback on actions taken as a result.

### Best practice 'should' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>7.3</b>	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	The Executive Director for Customers has lead responsibility for complaints. A summary of quarterly complaints is taken to Board as part of the quarterly performance monitoring report with a more detailed annual summary presented in June. Quarterly performance includes feedback

			gathered from customers using our real-time feedback service, Rant & Rave.
<b>7.4</b>	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	<p>An update on complaints is reported to Board every quarter as part of the Board Performance Report. This includes the number of complaints received in the quarter and year to date, the percentage responded to within timescales, percentage of complaints upheld and the number progressed to stage 2. The total number of informal complaints are also included. From 22/23 quarterly performance includes feedback gathered from customers using our real-time feedback service, Rant &amp; Rave. Heads of Service provide comprehensive narrative on any common issues experienced and actions taken to address these for any particular service areas. The report also includes any cases that the Housing Ombudsman were involved with if there were any.</p> <p>The first self-assessment against the Complaint Handling Code was last taken to Board in December 2020 in line with the requirements. The latest self-assessment for the revised 2022 code was presented to Board on 12th September 2022 in line with the requirements and then published on the website.</p>
<b>7.5</b>	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 quarterly Complaints Findings Report produced by the Head of Customers would report such items found and actions taken, and this would also be included in the reporting to Board. Issues are also raised by the Service Managers responding to Stage one complaints.</p> <p>A review of complaint handling has been carried out independently by Customer Service Solutions. The findings and recommendations of this will be included in a review of processes and training. This will be concluded by September 23.</p>
<b>7.6</b>	Landlords should have a standard objective	Yes	The culture of North Star and training



	<p>in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>		<p>provided specifically on complaints and customer service empowers staff to work together, take ownership and accountability and resolve issues for our customers. This can be evidenced in training records. However, no specific objective relating to complaints is in place for all employees. This is an area that requires strengthening and focus and will form part of the training in complaint handling to be carried out by September 23.</p>
--	---	--	--

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

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	The Housing Ombudsman Self-Assessment for 2020 was completed for December 2020. The previous version of the code did not require an annual self-assessment to be approved by Board unless there was a significant structure change or the code changed therefore in 2021 the self-assessment was reviewed along with the complaints policy. The revised code 2022 now requires an annual self-assessment and this will be programmed in annually going forward. The self-assessment for 2022 was reported to Board on 12th September 2022 and published on the website. Further update in January 2023 Consumer Standard Report and June 2023 as part of Governance Report.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A full self-assessment would be completed under these circumstances to ensure continued compliance with the code.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their</li> </ul>	Yes	The previous self-assessment was reported to Board in December 2020 and published on the website for customers. The winter tenant's newsletters 2020 and 2021 referred to the new complaints code and details on the website. Following the revised code we now need to also include the self-assessment on the annual report. The self-assessment for 2022 was reported to Board on 12th September

	annual report section on complaints handling performance		2022 and published on the website.
--	---	--	------------------------------------