



YMCA BLACK COUNTRY GROUP

Housing Ombudsman Complaints Handling Self-Assessment, April 2024

Guidance notes for the Housing Ombudsman Service:

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 complaint's 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.

Self-Assessment Review Date	May 2024
Approval by Governance Committee/MRC	11 th June 2024
Review Due Date:	May 2025

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	No	Compliments, Comments and Complaints Policy	<p>Section 3.2 of the Compliments, Comments and Complaints Policy defines a complaint as;</p> <p>'A complaint is a way of letting us know that customers are not happy with a particular service, in particular: -</p> <ul style="list-style-type: none"> a) Customers think we have not done something we should have done, b) The Association has done something badly or in the wrong way, c) Customers think they have been treated unfairly or impolitely. d) The Association has got things wrong; customers will receive an apology in writing. <p>Action: Introduce the specific definition as detailed in the Code Requirement. CCCP to be reviewed by end of July 2024.</p>
1.3	A resident does not have to use the word 'complaint' for it to be treated as such.	Yes	Compliments, Comments and Complaints Policy	Any issues raised that fit the complaints definition, even if

	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.			the term 'complaint' is not used, will be treated as such.
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 recorded, monitored, and reviewed regularly.	No	Compliments, Comments and Complaints Policy	<p>In Section 3.1 of the Compliments, Comments and Complaints Policy we recognise the difference between a Complaint and a Compliment or Comment (or service request). We state here,</p> <p>'a comment or compliment can be: -</p> <p>a) What customers think about our services and policies,</p> <p>b) Ideas on how we can improve our services,</p> <p>c) Informing us of their satisfaction with a service, activity, or a particular member of staff.</p> <p>Action: This could be better defined in our Compliments, Comments and Complaints Policy. CCP to be reviewed by end of July 2024.</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with	Yes	Compliments, Comments and Complaints Policy	If a resident is not satisfied by the informal response to

	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.			the service request, they will be encouraged to raise a formal complaint.
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	Residents Satisfaction Survey	Our Residents Satisfaction Survey including TSM Measures specifically asks residents about their experiences of raising complaints. All residents are provided with details of how they can make a complaint, and in the next survey when asking this question, a link will be provided to the complaints policy.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy provides no grounds for exclusion of a complaint, as such, all complaints must be considered. We allow the process of complaint handling to decide if the matter is upheld or not.
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"> • The issue giving rise to the complaint occurred over twelve months ago. • 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. • Matters that have previously been considered under the complaints policy. 	Yes	Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy provides no grounds for exclusion of a complaint, as such, all complaints must be considered. We allow the process of complaint handling to decide if the matter is upheld or not.
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	Yes	Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy does not set a time limit on when a complain must be received

	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.			to be heard, as such, all complaints must be considered, regardless of the timeframe.
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	Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy provides no grounds for exclusion of a complaint, as such, all complaints must be considered. All residents are provided with details on how to escalate complaints to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy provides no grounds for exclusion of a complaint, as such, all complaints must be considered.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Compliments, Comments and Complaints Policy	<p>Residents can complain verbally in person or over the phone, via email, on the website or in writing.</p> <p>Section 13.1 of the Compliments, Comments and Complaints Policy states 'YMCABCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity. All of YMCABG's policies are subject to periodic review</p>

				under the equality impact assessment process.'
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	Compliments, Comments and Complaints Policy	Residents can complain verbally in person or over the phone, via email, on the website, or in writing. All staff are required to sign on People HR that they have read and understood the Compliments, Comments and Complaints Policy and as such know how to pass details of the complaint to the appropriate person.
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	Compliments, Comments and Complaints Policy	Section 1.1 of the Compliments, Comments and Complaints Policy states that 'YMCA Black Country Group recognises the importance of customer feedback and welcomes compliments, comments, and complaints about its services. YMCA Black Country Group is committed to using the information it receives to help drive forward improvements.'
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	Yes	Website and CCC Form	The Compliments, Comments and Complaints Policy is published on our website. Complaints Policy - YMCA Black Country Group (ymcabc.org.uk)

	responding. The policy must also be published on the landlord's website.			The Compliments, Comments and Complaints Form is also on our website and is provided to residents. YM185-CCC-Form.pdf (ymcabc.org.uk)
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No	We do not make this explicitly clear in The Compliments, Comments and Complaints Policy	Action: Include within The Compliments, Comments and Complaints Policy details of how we will publicise itself. CCP to be reviewed by end of July 2024.
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.	No	We do not make this explicitly clear in The Compliments, Comments and Complaints Policy	Action: Include within The Compliments, Comments and Complaints Policy the option for complainants to be accompanied. CCP to be reviewed by end of July 2024.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	The Compliments, Comments and Complaints Policy	Section 11.1 of The Compliments, Comments and Complaints Policy provides details of how to escalate their complaint to the Housing Ombudsman Service.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	The Compliments, Comments and Complaints Policy	The Chief Corporate Officer is assigned the responsibility of Complaints Officer. Their Responsibilities are identified in section 5.3 of The Compliments, Comments and Complaints Policy. Action: Define the role of the 'Complaints Officer' within the policy.
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	Organisational Structure	The Complaints Officer is a senior member of staff with authority over all non-Chief Officer 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	The Compliments, Comments and Complaints Policy	Section 1.1 of The Compliments, Comments and Complaints Policy states 'YMCA Black Country Group recognises the importance of customer feedback and welcomes compliments, comments, and complaints about its services. YMCA Black Country Group is committed to using the information it receives to

				<p>help drive forward improvements. All staff are required to sign on People HR that they have read and understood the Compliments, Comments and Complaints Policy and as such know how to pass details of the complaint to the appropriate person.</p>
--	--	--	--	---

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	The Compliments, Comments and Complaints Policy	Section 2.2 of The Compliments, Comments and Complaints Policy states that 'this procedure should be followed when dealing with a compliment, comment or complaint made <u>by a customer, visitor or in some instances an employee.</u> ' Residents are for the purpose of this policy included within the overarching term 'customer' and thus not treated differently.
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	The Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy does not include complex stages, it refers to 'responding to a complaint' (Stage 1) and 'appeals' (Stage 2).
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	The Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy does not include complex stages, it refers to 'responding to a complaint' (Stage 1) and 'appeals' (Stage 2).
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	Yes	Terms of engagement with third parties	Any third party handling a complaint will be required to work in line with The

	stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			Compliments, Comments and Complaints Policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Terms of engagement with third parties	Any third party handling a complaint will be required to work in line with The Compliments, Comments and Complaints Policy.
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	CCC Form	The Resident is asked to provide details of the complaint in the CCC Form and if this is unclear, the complaint handler will support them to provide further clarification.
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	Examples of responses given	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	The Compliments, Comments and Complaints Policy	Section 9.4 of The Compliments, Comments and Complaints Policy states that we will 'impartially investigate the matter and put in place corrective action to prevent or reduce the risk of recurrence and respond to the complaint.'

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	The Compliments, Comments and Complaints Policy	Within 8.4 of The Compliments, Comments and Complaints Policy we state that 'when a written complaint is complex, it may take longer to complete a thorough investigation, potentially involving other staff and managers and resolve any issues. If this happens, we will contact the complainant within 10 working days to update them of progress.' 9.6 states 'Where an investigation is extensive, the complainant will be kept informed of progress.'
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 reasonable adjustments must be kept under active review.	Yes	The Compliments, Comments and Complaints Policy	13.1 of The Compliments, Comments and Complaints Policy states 'YMCABCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, sexual

				orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity.' As such, any reasonable adjustments required to enable a resident to complain will be made.
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	The Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy makes no provision to refuse to escalate a complaint through all stages, and therefore there are no grounds to do so.
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	The Compliments, Comments and Complaints Policy	Section 12.1 of The Compliments, Comments and Complaints Policy states 'All documentation relating to each compliment, comment or complaint will be kept electronically in a Central File on the Executive Team SharePoint, together with the Compliment, Comments and Complaints Log. 12.2 Departments may keep copies of compliment, comments and complaints received and response made, for inspection purposes in accordance with governing body guidelines. 12.3 Any personal data included as part of a compliment,

				comment or complaint is to be handled in accordance with the Association's Data Protection Policy
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	The Compliments, Comments and Complaints Policy	Section 8.3 e) of The Compliments, Comments and Complaints Policy recognises that complaint handlers will 'Resolve the matter to the best of their ability in consultation with colleagues and managers as appropriate as soon as possible and, where appropriate, take steps to prevent it happening again.'
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Residents Code of Conduct, Anti-Social Behaviour Policy, License Agreement or Tenancy	Any breach of the license agreements or tenancies will result in the warnings procedure being applied.
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	The Compliments, Comments and Complaints Policy	13.1 of The Compliments, Comments and Complaints Policy states 'YMCABCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to

				<p>the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity.' As such, any restrictions placed on residents will have been considered with due regard for the Equality Act 2010.</p>
--	--	--	--	---

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	The Compliments, Comments and Complaints Policy	Section 8.3 e) of The Compliments, Comments and Complaints Policy recognises that complaint handlers will 'Resolve the matter to the best of their ability in consultation with colleagues and managers as appropriate <u>as soon as possible</u> and, where appropriate, take steps to prevent it happening again.' Within 8.4 of The Compliments, Comments and Complaints Policy we state that 'when a written complaint is complex, it may take longer to complete a thorough investigation, potentially involving other staff and managers and resolve any issues. If this happens, we will contact the complainant within 10 working days to update them of progress.' 9.6 states 'Where an investigation is extensive, the complainant will be kept informed of progress.'
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the	Yes	The Compliments, Comments and Complaints Policy	Section 9.3 a) of The Compliments, Comments and

	complaints procedure <u>within five working days of the complaint being received.</u>			Complaints Policy states that 'a) On receipt of a written complaint, it is the responsibility of the staff member to ensure the communication is dated and signed by the customer', thus acknowledging the complaint immediately when received, thus acknowledging the complaint immediately when received and therefore within 5 days.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	The Compliments, Comments and Complaints Policy	Section 9.6 a) of The Compliments, Comments and Complaints Policy states that 'a written response must be made within 7 working days of receiving the compliment, comment or complaint.'
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	The Compliments, Comments and Complaints Policy	Within 8.4 of The Compliments, Comments and Complaints Policy we state that 'when a written complaint is complex, it may take longer to complete a thorough investigation, potentially involving other staff and managers and resolve any issues. If this happens, we will contact the complainant within 10 working days to update them of progress.' 9.6 states 'Where an investigation is extensive, the complainant

				will be kept informed of progress.'
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	The Compliments, Comments and Complaints Policy	Section 11.1 of The Compliments, Comments and Complaints Policy provides details of how to escalate their complaint to the Housing Ombudsman Service.
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	The Compliments, Comments and Complaints Policy	In section 9.6 of The Compliments, Comments and Complaints Policy we recognise that a written response must be made but do not specify that this must include outstanding actions to address the issue or to provide updates. Action: A template 'Complaint Outcome Letter' will be drafted, ensuring that complain handlers respond to these points.
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	Examples of responses given	Responses to complaints are detailed and address all points raised with reasons given for any decisions made.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and 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	Yes		Additional complaints raised during the investigation will be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued,

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will 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"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Examples of responses given	Responses given to complainants cover the areas identified in 6.9 of the Code, however, to ensure consistency, a 'Complaint Outcome Letter' will be drafted. Action: A template 'Complaint Outcome Letter' will be drafted, ensuring that complain handlers respond to these points.

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 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	The Compliments, Comments and Complaints Policy	Section 10.1 of The Compliments, Comments and Complaints Policy provides detail of our Appeals Process (Stage 2.) It states 'If the customer is not happy with the response given by the departmental manager (at stage

				1) then the matter will be dealt with by the Executive Head / Head of Service or Chief Officer if the matter has been dealt with by the Head of Service.'
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	The Compliments, Comments and Complaints Policy	Section 10.2 of The Compliments, Comments and Complaints Policy states 'A written response must be made within 7 working days of receiving the appeal against the response previously given. A copy of the written response must also be given to the Chief Corporate Officer.'
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	The Compliments, Comments and Complaints Policy	The Compliments, Comments and Complaints Policy makes no requirement for the complainant to explain their reasons for requesting a Stage 2 consideration.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Compliments, Comments and Complaints Policy	Section 10.1 of The Compliments, Comments and Complaints Policy provides states 'If the customer is not happy with the response given by the departmental manager, then the matter will be dealt with by the Executive Head / Head of Service or Chief Officer if the matter has been dealt with by the Head of Service.'

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	The Compliments, Comments and Complaints Policy	Section 10.2 of The Compliments, Comments and Complaints Policy states 'A written response must be made within 7 working days of receiving the appeal against the response previously given.'
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	The Compliments, Comments and Complaints Policy	Within 8.4 of The Compliments, Comments and Complaints Policy we state that 'when a written complaint is complex, it may take longer to complete a thorough investigation, potentially involving other staff and managers and resolve any issues. If this happens, we will contact the complainant within 10 working days to update them of progress.' 9.6 states 'Where an investigation is extensive, the complainant will be kept informed of progress.'
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	The Compliments, Comments and Complaints Policy	Section 11.1 of The Compliments, Comments and Complaints Policy provides details of how to escalate their complaint to the Housing Ombudsman Service.
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	Yes	The Compliments, Comments and Complaints Policy	In section 9.6 of The Compliments, Comments and Complaints Policy we recognise that a written

	actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			response must be made but do not specify that this must include outstanding actions to address the issue or to provide updates. Action: A template 'Complaint Outcome Letter' will be drafted, ensuring that complain handlers respond to these points.
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	Examples of responses given	Responses to complaints are detailed and address all points raised with reasons given for any decisions made.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Examples of responses given	Responses given to complainants cover the areas identified in 6.19 of the Code, however, to ensure consistency, a 'Complaint Outcome Letter' will be drafted. Action: A template 'Complaint Outcome Letter' will be drafted, ensuring that complain handlers respond to these points.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Appeal (Stage 2) is our final response.

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"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	The Compliments, Comments and Complaints Policy	Section 7.1 c) of The Compliments, Comments and Complaints Policy recognises that ultimately 'If we have got things wrong, we will apologise'. It goes on to state in 8.3 That when receiving a complaint, staff will: a) Discuss the complaint with the complainant in a safe area, but away from a public view. b) Listen attentively, c) Be polite and respectful at all times, d) Take the concerns seriously and arrange for them to be looked into thoroughly e) Resolve the matter to the best of their ability in consultation with colleagues and managers as appropriate as soon as

				possible and, where appropriate, take steps to prevent it happening again. f) Staff need to check with complainants that they are happy with the response or whether they would like to make a formal complaint in writing. g) Oral complaints and their outcome need to be logged.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Examples of responses given	Any remedy offered will reflect the impact in the resident.
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	Examples of responses given	Any remedy offered will clearly outline what will happen and have clear timescales.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Examples of responses given	We will reflect the Ombudsman guidance when issuing remedies.

Section 8: Self-assessment, reporting and compliance.

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"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord’s performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	The Compliments, Comments and Complaints Policy	<p>Section 5.1 of The Compliments, Comments and Complaints Policy recognises that the Board of Directors will receive and monitor half-yearly a Compliments, Comments and Complaints Report. This will include the items listed under 8.1 of the Code Requirements.</p> <p>Action: Review format of CCC Report to ensure it encompasses all items listed under 8.1</p>
8.2	The annual complaints performance and service improvement report must be	Yes	The Compliments, Comments and Complaints Policy	Section 5.1 of The Compliments, Comments and

	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.			Complaints Policy recognises that the Board of Directors will 'receive and monitor half-yearly a Compliments, Comments and Complaints Report. This will be published on our website with a response from the Board of Directors.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	In the event of a significant restructure or merger, this self-assessment will be revisited.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	N/A	We will comply 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.	N/A	N/A	We will comply if required.

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	The Compliments, Comments and Complaints Policy	5.4 of The Compliments, Comments and Complaints Policy recognises that we will 'Analyse all forms/complaints and put in place actions to improve the service if necessary and produce an Action Plan if required.' This evidences our commitment to learning from complaints made.
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	The Compliments, Comments and Complaints Policy	Section 1.1 of The Compliments, Comments and Complaints Policy states 'YMCA Black Country Group recognises the importance of customer feedback and welcomes compliments, comments and complaints about its services. YMCA Black Country Group is committed to using the information it receives to help drive forward improvements.' This informs our attitude to complaint handling.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from	Yes	Resident Satisfaction Surveys	Feedback is provided to all residents on issues raised through the Residents Satisfaction Survey, this

	complaints to stakeholders, such as residents' panels, staff and relevant committees.			includes their views on how complaints are handled and any action we have taken as a result.
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	The Compliments, Comments and Complaints Policy	The Chief Corporate Officer is assigned the responsibility of Complaints Officer. Their Responsibilities are identified in section 5.3 of The Compliments, Comments and Complaints Policy and includes the requirement to report to the Finance, Audit and Risk Committee as part of the Corporate Quarterly KPIs a summary of all compliments, comments and complaints received.
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 Responsible for Complaints ('the MRC').	Yes	Board Minutes 22/05/24	A Trustee has been appointed to support the Chief Officer Places in the implementation of the Self-Assessment. This will be further scrutinised by the Governance Committee who will fulfil the responsibilities of 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	Governance Sub Committee Terms of Reference	The Governance Sub Committee is responsible for ensuring we meet our statutory obligations and will ensure the full Board of Trustees receive regular information on complaints.

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	Copies of KPI’s produced,	The Chief Corporate Officer as assigned Complaints Officer’ will ensure the Governance Committee/MRC receive the appropriate KPI information listed in section 9.7 of the code requirements.
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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Partially	The Compliments, Comments and Complaints Policy	2.2 of The Compliments, Comments and Complaints Policy clarifies that the procedure should be followed when dealing with a compliment, comment or complaint made by a customer, visitor, or an employee. This Policy applies to all YMCA Black Country Group members including its subsidiaries and associated companies. 2.4 states that this Policy is to be read in conjunction with YMCCABCG’s: Staff Handbook which provides further detail on our approach to working with colleagues and across departments in a none blame

				approach. Section 5.4 of The Compliments, Comments and Complaints Policy sets out the responsibility for Chief Operating Officers to identify complaints received from third parties, including commissioners, local authority and stakeholders.
--	--	--	--	--

The Governance Sub Committee of the Board of Trustees approved the Housing Ombudsman Complaints Handling Self-Assessment on the 11th June 2024 and actions identified for further improvement.