

Plus Dane Housing Self-Assessment Form (Completed November 2020).

Housing Ombudsman Complaint Handling Code

Compliance with the Complaint Handling Code			
1	Definition of a complaint	Yes	No
	<p>Does the complaints process use the following definition of a complaint?</p> <p><i>An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i></p>	<p>We have adopted the Housing Ombudsman's definition of a complaint it is included on page 5, item 6 of our Customer Complaint and Feedback Policy.</p> <p>Policy Extract:</p> <p><i>6 Complaints</i></p> <p><i>Plus Dane has adopted the Housing Ombudsman's definition of a complaint which is defined as:</i></p> <p><i>A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by us, our staff, or those acting on our behalf, affecting an individual resident or group of residents.</i></p> <p><i>Customers do not have to use the word complaint for it to be treated as such.</i></p> <p><i>Complaints can be about:</i></p> <ul style="list-style-type: none"> • <i>the standard of service we provide</i> • <i>any action or lack of action by us affecting an individual or a group</i> 	n/a

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		<ul style="list-style-type: none"> <i>the behaviour of our staff or anyone acting on our behalf</i> 	
	<p>Does the policy have exclusions where a complaint will not be considered?</p>	<p>We have an information section on exclusions included within our policy, page 5 item 7.</p> <p>A more detailed list of the types of complaints which we will not consider are included in our Complaint Process and Procedure Guidance.</p> <p>Policy Extract</p> <p><i>7 Exclusions from this policy</i></p> <p><i>Complaints about our services other than those excluded in the Complaint Process and Procedure Guidance document (see page 12, item 38) will be recorded as complaints and administered under this policy. This includes situations such as an active case of anti-social behaviour or where there is an ongoing legal matter, for example.</i></p> <p><i>Where we have investigated the circumstances and decided that we are unable to consider the matter under the complaint policy, we will:</i></p> <ul style="list-style-type: none"> <i>ensure the reason for not accepting the complaint is fair and reasonable</i> <i>provide an explanation to the customer setting out the reasons why the matter is not suitable</i> 	<p>n/a</p>

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		<p><i>for consideration through the complaints process.</i></p> <ul style="list-style-type: none"> • <i>direct the customer to the Housing Ombudsman if they wish to challenge our decision</i> <p><i>However, where appropriate the Ombudsman can instruct us to take on the complaint.</i></p>	
	<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon:</p>	<p>We followed the HOS Complaint Handling Code guidance 1.4 - 1.7 to refresh our policy in Nov-20 (which will be submitted to Board for approval in Dec-20).</p> <p>We also referred to the 'FAQs On the Complaint Handling Code' pages on your website to ensure these exclusions are reasonable and fair to residents.</p> <p><i>Examples:</i></p> <ul style="list-style-type: none"> • <i>An initial request for a service, such as the first report of a repair</i> • <i>Complaints about neighbour disputes, ASB or nuisance these are handled in accordance with Plus Dane's ASB & Nuisance Policy (however, we will accept complaints about how an ASB case is being/or has been dealt with)</i> • <i>If the issue occurred over 6 months ago (however if the problem is a reoccurring issue,</i> 	<p>n/a</p>

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		<p><i>we may consider an older complaint if this will help resolve the issue for the customer)</i></p> <ul style="list-style-type: none"> • <i>Where legal proceedings have started</i> • <i>Matters that have already been considered through all stages of our complaint policy</i> • <i>Complaints about services we are not responsible for delivering</i> • <i>Complaints about disrepair or personal injury insurance claims, these are managed by Plus Dane’s solicitors/legal team</i> • <i>Allegations about the conduct of Board members, these complaints will be handled independently of this policy and in accordance with good practice</i> • <i>Where the allegations made may be considered a criminal matter</i> • <i>Where it is identified that a complaint is related to a human resource matter</i> 	
2	Accessibility		
	<p>Are multiple accessibility routes available for residents to make a complaint?</p>	<p>Accessibility routes are included on page 6, item 8 of our Customer feedback and Complaints Policy.</p> <p>Policy Extract</p> <p><i>8 How to make a complaint and provide feedback</i></p> <p><i>Our customers can make complaints and provide feedback in a number of ways:</i></p> <ul style="list-style-type: none"> ○ <i>in person</i> 	n/a

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		<ul style="list-style-type: none"> ○ <i>via our website</i> https://www.plusdane.co.uk/complaints/ ○ <i>email us at complaints@plusdane.co.uk</i> ○ <i>by calling 0800 169 2988</i> ○ <i>through a member of our staff</i> ○ <i>via social media, for example Facebook or Twitter</i> ○ <i>in writing to our registered head office</i> ○ <i>complete the form on the back of our complaint leaflet</i> ○ <i>through surveys</i> 	
	Is the complaints policy and procedure available online?	Our Customer Complaints and Feedback Policy and summary leaflet are published on our website www.plusdane.co.uk/complaints	n/a
	Do we have a reasonable adjustments policy?	<p>Our reasonable adjustments statement is included on page 6, item 10.</p> <p>Policy Extract</p> <p><i>10 Accessibility</i></p> <p><i>This policy and accompanying summary leaflet is available in a clear and accessible format. It is published on our website and is available in a variety of formats on request.</i></p> <p><i>Staff will provide information on our complaints procedure to customers and provide any assistance</i></p>	n/a

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		<p><i>and support they may require in compliance with the Equality Act 2010, for example:</i></p> <ul style="list-style-type: none"> • <i>Assisting with making a complaint or completing a form</i> • <i>Making appropriate arrangements for customers who have specific requirements, e.g. BSL, large print or braille, wheelchair access, etc.</i> • <i>Arranging for the services of an interpreter where appropriate</i> • <i>Advice on where to get help from an independent organisation to act as an advocate</i> <p><i>We will provide customers with contact information for the Housing Ombudsman as part of our regular complaint handling correspondence. We also inform customers of their right to access the Housing Ombudsman Service, not only at the point they have exhausted our complaints process, but throughout the life of their complaint.</i></p>	
	<p>Do we regularly advise residents about our complaints process?</p>	<ul style="list-style-type: none"> • We have agreed a regular slot in our customer information magazine 'Unity'. • Complaints information is included in the 'contact us' section on our website' 	

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		<ul style="list-style-type: none"> • The complaint summary leaflet is attached to the complaints@plusdane.co.uk auto reply email and the leaflet is available on request. • We include details of the complaints section on our website on all complaint handling correspondence that we issue. • We refer to our Customer Feedback and Complaints Policy in other corporate policies. • Front facing staff provide complaint handling information to customers on request or where it is evident something has not gone as well as we or the customer expected. • We engage with our customers during scrutiny and policy reviews and listen to customers feedback in general, we also record comments and compliments and use valuable information to improve services for our residents. 	
3	Complaints team and process		
	Is there a complaint officer or equivalent in post?	<p>Plus Dane's Customer Relations Team (CRT) is responsible for ensuring that a responsive, professional, quality and compliant complaint handling service is provided to all customers at all times.</p> <p>The CRT team includes:</p>	

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		<ul style="list-style-type: none"> • Customer Relations and Service Improvement Manager (CRM) • Customer Relations Officer (CRO) <p>Extract from our policy (page 6, Item 11)</p> <p><i>11 The Customer Relations team (CRT)</i></p> <p><i>CRT take responsibility for complaint handling and coordinating complaints across the organisation, the team consists of the Customer Relations and Service Improvement Manager (CRM) and the Customer Relations Officer (CRO), as a team we:</i></p> <ul style="list-style-type: none"> • <i>act sensitively, fairly and impartially</i> • <i>are trained to receive complaints and deal with distressed and upset customers with empathy and understanding</i> • <i>have access to staff at all levels to facilitate quick resolution of complaints</i> <p><i>have the authority and autonomy to act and to help resolve disputes quickly and fairly.</i></p>	
	<p>Does the complaint officer have autonomy to resolve complaints?</p>	<p>Plus Dane operates a service led approach to complaint handling the majority of the time. CRT do have the autonomy to resolve complaints if the investigating officer requires additional help, support and guidance or if the officer assigned to a case is unavailable to investigate the customers concerns and respond within timescale.</p>	
	<p>Does the complaint officer have authority to compel engagement from other departments to resolve disputes?</p>	<p>The CRO issues a daily email to all staff who manage complaints within the organisation, their managers</p>	

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		<p>and directors. The email issued each working day morning, provides details of all of our open complaints, who they are assigned to, and their due dates. This function has been particularly useful in ensuring complaints are responded to within timescale. It also enables service leads to identify trends in the type of complaints we are receiving at any given time.</p> <p>In addition, the CRO regularly contacts staff who have an assigned open complaint to ensure their investigations have been completed effectively and efficiently and they are on target to respond to the customer within timescale.</p> <p>If any delays become apparent the CRO will escalate any issues to the assigned officers' manager or take over the complaint investigation on behalf of the service to ensure the customer receives a prompt reply and the requirements of our complaint policy are adhered to.</p>	
	<p>If there is a third stage to the complaint's procedure are residents involved in the decision making?</p>	<p>We do not have a third stage; therefore residents are not involved in any decision making in regard to complaint handling.</p>	<p>No</p>
	<p>Is any third stage optional for residents?</p>	<p>There is no optional third stage in our process.</p>	<p>No</p>
	<p>Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?</p>	<p>Our stage two complaint response template includes a standard paragraph about this right.</p> <p>Extract from stage two letter template</p>	

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		<p><i>Please note under the terms of our complaint policy, this is our final response, if you remain dissatisfied, you may refer your complaint to a “Designated Person”. A “Designated Person” can be any Member of Parliament in England, any Councillor in your Local Authority. The “Designated Person” is able to refer your complaint to the independent Housing Ombudsman Service if they feel that this is the best option, or they may offer to mediate between you and Plus Dane in relation to this complaint.</i></p> <p><i>Alternatively, you may wait eight weeks from the date of this letter and contact the Housing Ombudsman Service directly. The Ombudsman can be contacted at PO Box 152, Liverpool, L33 7WQ or by telephone on 0300 111 3000 or you can send an email to info@housing-ombudsman.org.uk.</i></p> <p>Our suite of complaint handling letter templates have been amended to reflect that complainants have the right to access the Housing Ombudsman Service throughout the life of their complaint also.</p>	
	<p>Do we keep a record of complaint correspondence including correspondence from the resident?</p>	<p>We record details of all cases we consider a complaint in our Housing Management System (CX Customer Feedback Module).</p> <p>We have the functionality to upload attachments to a customer’s feedback case and other information relating to a customer’s complaint also.</p>	

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		Our responses to complaints are also held on file, electronically.	
	At what stage are most complaints resolved?	<p>Prior to implementing the requirements of the HOS Complaint Handling Code, most complaints were resolved at the initial informal stage of our process (stage 0 - quick resolution), these types of complaints were issues that we could put right quickly and within 5 working days.</p> <p>Once we remove stage 0 from our process to demonstrate compliance with the code, we expect the majority of complaints to be resolved at stage one - complaint investigation, with approx. 5 in every 100 cases escalating to stage 2.</p> <p>2019/20 Stage 0 = 81.2% Stage 1 = 17.1% Stage 2 = 1.7%</p> <p>2020/21 at end of Q2 Stage 0 = 81% Stage 1 = 16.7% Stage 2 = 2.4%</p>	
4	Communication		
	Are residents kept informed and updated during the complaints process?	Complaints are acknowledged in timescale and the majority of complaint responses are issued on time (97.9% as at the end of Q2 2020/21).	

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		<p>Our process and procedures recommend that all complaint investigators should contact complainants during the course of their complaint to:</p> <ul style="list-style-type: none"> a) Ensure they understand the complaint from the customers point of view. b) Understand what is required to put things right. c) Keep customers up to date with progress. <p>The CRT monitors the quality of complaint handling to ensure investigators and reviewers follow these procedures.</p>	
	<p>Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?</p>	<p>We encourage investigating officers at the final stage of the complaint process, usually a senior manager or director, to discuss the complaint with the complainant and the outcome they are seeking prior to issuing the final decision.</p>	
	<p>Are all complaints acknowledged and logged within five days?</p>	<p>Our aim is to log and acknowledge all complaints within two working days, our policy will be amended to reflect the recommendations of the code for consistency which is five working days. Most of our complaints are received by telephone to which the customer receives a verbal acknowledgement in the first instance.</p> <p>This additional three working day timescale will enable us to understand if the issue is an actual formal complaint or an initial request for a service. If it's the latter, we will take prompt action to resolve the issue for the customer quickly and within the</p>	

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		<p>appropriate service standard for example complete a repair.</p> <p>If not, a formal acknowledgment letter/email will follow the recording of the complaint and confirm, the complaint processing timescales and who the complaint has been assigned to.</p>	
	Are residents advised of how to escalate at the end of each stage?	<p>Our suite of formal complaint response templates includes details on how to escalate a complaint at the end of each stage.</p> <p>Along with our policy our letter templates are also being reviewed this year following the Nov-20 policy refresh and introduction of the HOS Complaint Handling Code.</p>	
	What proportion of complaints are resolved at stage one?	<p>2019/20 Stage 0 = 81.2% Stage 1 = 17.1% Stage 2 = 1.7%</p> <p>2020/21 at end of Q2 Stage 0 = 81% Stage 1 = 16.7% Stage 2 = 2.4%</p>	
	What proportion of complaints are resolved at stage two?	See above	
	What proportion of complaint responses are sent within Code timescales?	The code timescales will be introduced once the new policy has been approved by Board in Dec-20 and the	

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	<ul style="list-style-type: none"> • Stage one Stage one (with extension) • Stage two Stage two (with extension) 	<p>reporting framework will be amended to report on the revised timescales.</p> <p>Stage 0 = 5 working days Stage 1 = 10 working days Stage 2 = 20 working days</p> <p>2019/20 Stage 0 = 81.1% Stage 1 = 16.9% Stage 2 = 1.3% Total = 99.3%</p> <p>2020/21 Stage 0 = 81% Stage 1 = 16.7% Stage 2 = 2.4% Total = 97.9%</p> <p>The extensions are recorded as exceptions, during the first half of 20/21.</p> <p>So far this year we have extended 11 complaints out of a total of 350 (3.14%), this is a higher proportion than usual, and we believe the majority of the extensions this year are due to the impact of COVID-19.</p>	
	<p>Where timescales have been extended did, we have good reason?</p>	<p>The main reasons include:</p> <ul style="list-style-type: none"> • At the customer's request 	

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		<ul style="list-style-type: none"> • More information required • Information required from a 3rd party • Complex nature of the complaint • The officer needed more time <p>Examples of good reasons for extending complaints are included in our complaint process and procedure guidance.</p>	
	Where timescales have been extended did, we keep the resident informed?	<p>We always aim to respond in timescale however holding letters are sent to complainants if it becomes apparent, we need more time to respond.</p> <p>A holding letter template is included in our suite of complaint handling letter templates.</p> <p>The holding letters are issued by the CRO following a discussion with the complaint investigator and the CRO decides if the extension is appropriate and compliant with our policy.</p>	
	What proportion of complaints do we resolve to residents' satisfaction	<p>KPI Satisfaction with the outcome of the complaint:</p> <p>2019/20 Q4 = 67.6%</p> <p>2020/21 Q2 = 64.7%</p>	
5	Cooperation with Housing Ombudsman Service		
	Were all requests for evidence responded to within 15 days?	So far this year we haven't been asked to provide any evidence to the Housing Ombudsman Service in relation to a complaint which has been brought to them. It will be our intention to comply with the 15-day request for information timescale as most of the	

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		<p>information will have been gathered during the complaint investigation and review stages.</p> <p>We have been asked by the HOS on a couple of occasions to confirm if a complaint has been responded to through the stages of our complaint process and we have responded within the requested timescale on each occasion.</p>	
	<p>Where the timescale was extended did, we keep the Ombudsman informed?</p>	<p>Our Complaint Process and Procedure Guidance includes details of this and the above requirement. So far this has not been necessary – see response above.</p>	
6	<p>Fairness in complaint handling</p>		
	<p>Are residents able to complain via a representative throughout?</p>	<p>We are happy to deal with customers representatives as long we have received third party authorisation to do so.</p> <p>Extract from Policy:</p> <p><i>4 Who can give feedback or make a complaint?</i> <i>Anyone who receives or requests a service from Plus Dane and those acting on our behalf or anyone who is affected by our decisions or actions, such as non-tenant neighbours, applicants for housing.</i></p> <p><i>A member of a recognised organisation such as Citizen Advice Bureau, Housing Aid Centre, Shelter, a tenant or resident group, MP or Councillor or a friend or relative can also act on behalf of a tenant.</i></p>	

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	If advice was given, was this accurate and easy to understand?	Our Complaint Process and Procedure Guidance includes details of this requirement.	
	How many cases did we refuse to escalate? What was the reason for the refusal?	We rarely refuse to escalate a complaint; no cases were refused for escalation during 2019/20 or during 2020/21 so far.	
	Did we explain our decision to the resident?	Our Complaint Process and Procedure Guidance includes details of this requirement.	
7	Outcomes and remedies		
	Where something has gone wrong are you taking appropriate steps to put things right?	<p>The aims of our policy are as follows, page 4, item 2.</p> <p>Policy Extract</p> <p>2 Policy aims</p> <p><i>The policy seeks to be compliant with the regulatory approach to complaints and ensures our responses are clear, simple and accessible. We will resolve complaints promptly and politely.</i></p> <p><i>The policy will help staff recognise a formal complaint and follow a structured process when handling complaints and feedback, to help us:</i></p> <ul style="list-style-type: none"> • <i>focus on putting things right as quickly as possible</i> • <i>learn from positive and negative feedback to drive service improvements</i> • <i>create a positive complaint handling culture amongst staff and residents.</i> 	

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		<p>16 Putting things right</p> <p><i>When we get things wrong, we will accept responsibility, explain what went wrong and why and take action to put things right and take measures to prevent them from happening again.</i></p> <p><i>The general principle we follow is that a complainant should, so far as possible, be put in the position he or she would have been in, had things not gone wrong.</i></p> <p><i>The remedy chosen to resolve the complaint needs to be proportionate and appropriate to the failure in service. For further guidance refer to the Compensation Framework and the Complaint Process and Procedure Guidance</i></p>					
8	Continuous learning and improvement						
	<p>What improvements have we made as a result of learning from complaints?</p>	<p>Here are some examples of learning from 2019/20:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">You said</th> <th style="width: 50%;">We Did</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> <p>Our specialist aerial and TV contractor didn't contact the customer who reported a communal repair directly to check if the issue had been resolved and had to make a return visit to the property.</p> </td> <td style="vertical-align: top;"> <p>Communal repairs are currently logged against the building and not the property; we have reminded our contact centre staff to ensure the details of the customer reporting the issue are logged in the system appropriately; this will enable engineers to</p> </td> </tr> </tbody> </table>	You said	We Did	<p>Our specialist aerial and TV contractor didn't contact the customer who reported a communal repair directly to check if the issue had been resolved and had to make a return visit to the property.</p>	<p>Communal repairs are currently logged against the building and not the property; we have reminded our contact centre staff to ensure the details of the customer reporting the issue are logged in the system appropriately; this will enable engineers to</p>	
You said	We Did						
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			contact customers who have reported an issue directly.	
		A complaint about the investment programme timescales highlighted the need to have more information about the programme available on our website.	The webpage will be created by the Investment Team during our website redevelopment due in 2020-21.	
		A customer was unhappy with the lack of updates provided during programmed works which had been delayed due to resource.	The planned maintenance team will agree the frequency of updates prior to commencing works.	
		A customer told us they were unhappy with an officer's tone of voice during an arrears discussion.	Our communications team have rolled out a 'Tone of Voice' standard across the organisation. This will support colleagues to make sure that the communications they are responsible for are consistent with our tone of voice and easily understandable.	
		One of our specialist contractors failed to let a customer know that they	We have reminded our contractor to ensure contact is made with customers if an	

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		had cancelled their appointment.	appointment has to be unavoidably cancelled.		
	<p>How do we share these lessons with:</p> <ul style="list-style-type: none"> a) residents? b) the board/governing body? c) In the Annual Report? 	<ul style="list-style-type: none"> a) Residents - Any learning identified following an investigation or review of a complaint, is included in our formal response to the customer. Complaint Summary Reports including details of lessons learnt are uploaded to our website. b) Governing Body – We submit a quarterly report to Neighbourhood Committee which includes information on the learning identified from complaints as well as a more detailed annual report which sums up complaint activity, performance, trends and learning for the year. c) Annual Report – We produce a Complaint Handling Annual Summary which includes lessons learnt, additionally the Corporate Annual Report includes complaint data. 			
	<p>Has the Code made a difference to how we respond to complaints?</p>	<p>The introduction of the code has been an integral part of the recent review of our complaints policy and has changed the number of stages that we have in our process. We believe that this will build on a strong foundation of effective and efficient complaint handling within Plus Dane.</p> <p>We believe the introduction of the code will help us to establish and maintain the HOS's ambition of creating a positive culture amongst staff, customers and Board across the sector and ensure complaint handling data is being used consistently and that we comply with good practice guidelines.</p>			

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	What changes have we made?	<ul style="list-style-type: none">• We have adopted the Housing Ombudsman definition of a complaint.• We have refreshed our policy document and used similar language to that of the HOS to ensure consistency for colleagues and customers.• We have followed the HOS recommendations and removed the informal stage 0 and we operate a formal two stage complaint process.• We have a clear focus on putting things right	
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