

Stonewater Complaint Handling Code Self-Assessment June 2023

Appendix 1 – Self-Assessment Form

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	We use the Housing Ombudsman Service (HOS) universal definition of a complaint. This is explained in 5.4 of Stonewater Complaints, Comments and Compliments Policy. https://www.stonewater.org/about-us/policies/ . This Policy applies to all parts of the Stonewater Group, including Greenoak Housing Association.
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	We use the HOS’s universal definition of a complaint. This is explained in 5.4 of our Complaints, Comments and Compliments Policy. We handle third party or representative complaints in line with our customer Complaints, Comments and Compliments Policy. This is explained in 2.2 of our Complaints, Comments and Compliments Policy. https://www.stonewater.org/about-us/policies/
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	We distinguish between service requests and complaints. This is outlined in section 5.0 of our Complaints, Comments and Compliments Policy. We raise a complaint if further enquiries are needed, or if a customer requests us to raise a complaint (provided it complies with our Complaint, Comments and Compliments Policy). https://www.stonewater.org/about-us/policies/

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1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our Complaints, Comments and Compliments Policy outlines the limited circumstances in which we won't accept a complaint (6.3.2). In these instances, we write to customers to explain our decision and signpost them to the HOS for support. https://www.stonewater.org/about-us/policies/
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	Our Complaints, Compliments, and Comments Policy outlines the limited circumstances in which we won't accept a complaint (6.3.2). In these instances, we write to customers to explain our decision and signpost them to the HOS for support (6.3.2). https://www.stonewater.org/about-us/policies/
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	Our Complaints, Compliments, and Comments Policy outlines the limited circumstances in which we won't accept a complaint (6.3.2). In these instances, we write to customers to explain our decision and signpost them to the HOS for support (6.3.2) https://www.stonewater.org/about-us/policies/ .

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 service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We distinguish between service requests and complaints. This is explained in section 5.0 of our Complaints, Compliments, and Comments Policy. https://www.stonewater.org/about-us/policies/
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	Where possible, we make customers participating in surveys aware that they can pursue their dissatisfaction as a complaint.

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	<p>We accept complaints face to face, over telephone, email and post. Customers can also complain through www.stonewater.org website and use direct messages on Stonewater Facebook and Twitter.</p> <p>This is explained in our Complaints, Compliments, and Comments Policy (6.3.1) https://www.stonewater.org/about-us/policies/.</p> <p>We promote our Complaints service to our customers. This includes bespoke communications for Greenoak Housing Association customers.</p> <p>Examples include https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html</p>
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	<p>Our Complaints, Compliments, and Comments Policy is available on www.stonewater.org and https://www.greenoakha.org/ website in a clear and accessible format. It provides a detailed overview of the complaint stages and timeframes (6.5).</p> <p>We promote our Complaints, Compliments, and Comments Policy and how to complain through our customer communication. This includes on posters and displays in schemes, our customer e-newsletter and website.</p>
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	<p>Our Stonewater and Greenoak Housing Association websites have bespoke webpages for complaints.</p> <p>Our Complaints, Compliments and Comments</p>

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			<p>Policy are available on both websites, alongside customer friendly communications outlining the process and signposting customers to raise complaints.</p> <p>Examples can be found at https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html</p>
2.5	<p>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.</p>	Yes	<p>Our Equality and Diversity Policy explains our approach to adapting policies and processes to accommodate individual's needs. https://www.stonewater.org/about-us/policies/</p>
2.6	<p>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.</p>	Yes	<p>We provide regular customer communication about complaints including signposting to the HOS on our websites and in our wider customer communication.</p> <p>Examples can be found at https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html</p>

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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We promote the HOS throughout our correspondence with customers including in our letters, on our website and wider communication.</p> <p>Examples can be found at https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html</p>
2.8	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	<p>We advise customers of their right to access the HOS on our website, across our communication and in our complaint responses.</p> <p>For example, our <i>Customer Guide to Complaints</i> signposts customers to the HOS. https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	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	<p>Our Complaints, Compliments, and Comments Policy explains we accept complaints made through direct messages on Twitter and Facebook (6.3.1).</p> <p>These complaints are managed by our Customer Service Centre and referred to our Customer Relations Team in the same way as complaints made by telephone, email or letter.</p> <p>We explain our approach to privacy at https://www.stonewater.org/about-us/privacy/</p>

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Section 3 - Complaint handling personnel Mandatory

'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	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	Stonewater has a Customer Relations Team, which manage all our complaints. This is outlined in our Complaints, Compliments, and Comments Policy (6.3.1). https://www.stonewater.org/about-us/policies/
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	We recruit colleagues and support their continuous professional development to ensure appropriate complaint handling skills. We make sure colleagues have no conflicts of interest before we allocate a case.

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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Our Stonewater Customer Promise training, alongside bespoke complaint handling training and continuous professional development, supports our Customer Relations Team to develop the right skills to support customers sensitively and fairly. We have in place systems and structures to ensure complaint handlers have autonomy and support from colleagues at all level to facilitate quick resolution of complaints. This includes regular meetings with senior directors to agree resolution action plans for complaints. We target 90% resolution at stage one to drive faster resolution, and we share our performance against this target with our Customer Experience Challenge and Assurance Panel for oversight.

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	<p>Our Complaints, Compliments, and Comments Policy explains our approach to working with customers to agree resolution (6.5) https://www.stonewater.org/about-us/policies/</p> <p>We use our CRM system to record contact with customers, and case processing systems to ensure we deliver our complaint service in line with our Complaints, Compliments, and Comments Policy.</p> <p>We have no informal or pre complaint stages in our process.</p> <p>Due to customer feedback, we work hard to acknowledge complaints within two days to deliver better customer experience and faster resolution. This is explained in our Complaints, Compliments, and Comments Policy (6.5.1) https://www.stonewater.org/about-us/policies/</p>

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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	We ensure every complaint acknowledgement provides a clear overview of the complaint and the customer's preferred resolution. This is referenced in our Complaints, Compliments, and Comments Policy (6.5.1) https://www.stonewater.org/about-us/policies/
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We provide guidance to all our colleagues to ensure they approach investigations in an impartial manner. We undertake regular case reviews to make sure our policy, values and behaviours are reflected in our team's approach. We actively seek feedback from customers on our approach through our Customer Complaints Panel and customer satisfaction surveys.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	We provide training and guidance to our Customer Relations Team colleagues to ensure they approach investigations in an impartial manner.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We monitor customers' communication preferences, and adhere to reasonable requests in terms of frequency and method of communication. This is explained in our <i>Customer Guide to Complaints</i> https://www.stonewater.org/supporting-you/making-a-complaint/
4.12	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"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	This is set out in our Complaints, Compliments, and Comments Policy (6.3.3) https://www.stonewater.org/about-us/policies/

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<p>4.13</p>	<p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint</p>	<p>Yes</p>	<p>This is set out in our Complaints, Compliments, and Comments Policy (6.5) https://www.stonewater.org/about-us/policies/</p>
<p>4.14</p>	<p>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.</p>	<p>Yes</p>	<p>This is set out in our Complaints, Compliments, and Comments Policy (6.3.2 and 6.5) https://www.stonewater.org/about-us/policies/</p>

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4.15	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	We use our systems to record information associated with a complaint case, under a unique identifying reference. This is explained in our Complaints, Compliments, and Comments Policy 6.3.4 https://www.stonewater.org/about-us/policies/
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We explain our approach to managing unacceptable behaviour from customers and/or their representatives in our Complaints, Compliments, and Comments Policy (6.3.2) and accompanying Managed Relationships Policy https://www.stonewater.org/about-us/policies/

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	We work hard to manage customers' expectations, providing clear communication when a desired outcome is unreasonable or unrealistic. This includes referring to HOS' guidance on remedies.
4.4	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	We prioritise early resolution and report our performance against our target of 90% resolution at stage one to our Customer Experience Challenge and Assurance Panel regularly.
4.5	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 set out in our Complaints, Compliments, and Comments Policy (2.2). We ask customers to provide written permission for us to do deal with their representative. https://www.stonewater.org/about-us/policies/
4.8	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	This is part of our process when complaints relate to legal obligations.

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4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Complaint responses and communication do not generally refer to individual members of staff or contractors. We may refer a specific colleague as a contact point for commitments if necessary.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaint handlers are responsible for communication during the complaints process. We outline what customers can expect in our <i>Customer Guide to Complaints</i> https://www.stonewater.org/supporting-you/making-a-complaint/ https://www.greenoakha.org/residents/report-a-complaint.html
4.16	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	We survey customers about their experience on case closure through Rant & Rave. Customers rate our service, as well as their satisfaction with the outcome of the complaint. We target 60% customer satisfaction with complaint handling, and report this to our Board and customers.
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	We record learning points when we close cases through our case processing system. This allows colleagues to identify opportunities to improve future service delivery. We undertake reflective learning on complaint cases, sharing insight and recommendations regularly with our Operational Director Group, Chief Officers Group and Board. We complete reflective learning for any complaint cases that receive a determination from the Housing Ombudsman Service. This is shared on a quarterly basis with our Board.
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	We explain how we will ensure any restrictions on a resident's contact due to unacceptable behaviour is compliant with the Equality Act 2010 in our Managed Relationships Policy and our Equality and Diversity Policy https://www.stonewater.org/about-us/policies/

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 <u>within 10 working days</u> 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	We respond to all complaints within ten days, unless there are exceptional circumstances. If we do need to extend complaints, we explain this clearly to customers and provide a clear timeframe by when we will respond. If an extension beyond 10 working days (in addition to the original 10 days) is required, we will agree this with the customer. This is outlined in 6.5.1 of our Complaints, Compliments and Comments Policy https://www.stonewater.org/about-us/policies/
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	We send complaint responses to customers in line with our Policy and committed timescales. If any commitments are outstanding, service leads monitor them through to completion.
5.6	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	Alongside providing training and support to our team, we use quality checking to ensure our responses provide clear reasons for decisions. We also provide regular training for our team on housing law and policy.

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5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	<p>We train our colleagues to use our Stonewater 'tone of voice' to provide clear communication in simple, plain language.</p> <p>All responses provide the information listed, including how to escalate the complaint if the customer is unsatisfied. This is outlined in our Complaints, Compliments, and Comments Policy.</p> <p>We use robust quality checking to ensure each response achieves this standard. https://www.stonewater.org/about-us/policies/</p>
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	<p>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.</p> <p>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.</p>	Yes	<p>If customers are dissatisfied with our Stage 1 response, we will escalate their complaint to Stage 2 unless the complaint relates to the grounds for exclusion listed in our Complaints, Compliments, and Comments Policy (6.3.2). https://www.stonewater.org/about-us/policies/</p> <p>If we decline to escalate the complaint, we write to the customer to explain this and signpost them to the HOS.</p>
5.10	<p>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.</p>	Yes	<p>Our acknowledgement at Stage 2 outlines the complaint and the outcome the resident is seeking. If we're unclear, we speak with the customer to agree a full definition.</p>
5.11	<p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	Yes	<p>This is set out in our Complaints, Compliments, and Comments Policy (6.5). https://www.stonewater.org/about-us/policies/</p>
5.12	<p>The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.</p>	Yes	<p>This is set out in our Complaints, Compliments, and Comments Policy (6.5.2) https://www.stonewater.org/about-us/policies/</p>

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5.13	Landlords must respond to the stage two complaint within 20 working days 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	In consultation with our customers, we've agreed a standard response time of 10 days once we've acknowledged a Stage 2 complaint. This is to deliver better customer service. Extensions beyond a further ten days are agreed with the customer. This is set out in our Complaints, Compliments, and Comments Policy (6.5.2) https://www.stonewater.org/about-us/policies/
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"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		We train our colleagues to use our Stonewater 'tone of voice' to provide clear communication in simple, plain language. All responses provide the information listed, including how customers can choose to refer their case to our Customer Complaints Panel, an optional third stage in our complaints process. We're clear in our communication that this stage is optional and we make customers aware of how they can escalate their complaint to the HOS.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	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.	Yes	We have an optional third stage, where customers can refer their complaints to our Customer Complaints Panel (CCP) for review. Our CCP is made up of customers who review the complaint and our response, providing direction to Stonewater on our complaint handling and proposals to resolve the customer's concerns. The role of the CCP is outlined in our Complaints, Compliments and Comments

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			<p>Policy and <i>our Customer Guide to Complaints</i>.</p> <p>Our consultation with customers in July 2022 confirmed customers' support for the continued use of the CCP. The CCP provides invaluable insight, helping us to resolve our customers' complaints on an individual basis, and driving service delivery improvement by feeding into our learning from complaints work-stream.</p>
<p>5.20</p>	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	<p>Yes</p>	<p>This is set out in our Complaints, Compliments, and Comments Policy (6.5.4). https://www.stonewater.org/about-us/policies/</p>

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Best practice 'should' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	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	This is set out in our Complaints, Compliments, and Comments Policy (6.5.1) https://www.stonewater.org/about-us/policies/
5.3	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	This is set out in our Complaints, Compliments, and Comments Policy (6.5.1) https://www.stonewater.org/about-us/policies/
5.4	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	We review the history of the complaint case when we raise it at Stage one to understand if it is a recurring issue (6.5.1) https://www.stonewater.org/about-us/policies/
5.7	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	This is set out in our Complaints, Compliments, and Comments Policy (6.5.1) https://www.stonewater.org/about-us/policies/

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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	We will seek to respond to all Stage 2 complaints within ten days. If needed, we will extend by up to a further twenty days. If any further time is needed, we will agree this with the customer. This is set out in our Complaints, Compliments, and Comments Policy (6.5.2) https://www.stonewater.org/about-us/policies/
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	This is set out in our Complaints, Compliments, and Comments Policy (6.5.2) and explained in our communication with customers as required. https://www.stonewater.org/about-us/policies/

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 within 20 working days 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.	Yes	This is set out in our Complaints, Compliments, and Comments Policy (6.5.4) https://www.stonewater.org/about-us/policies/
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.	Yes	This is set out in our Complaints, Compliments, and Comments Policy (6.5.4) https://www.stonewater.org/about-us/policies/

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 at the heart of our approach to resolving complaints. It set out in our Complaints, Compliments, and Comments Policy, and reiterated in all our colleague training and customer communication. https://www.stonewater.org/about-us/policies/
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	We use the HOS's guidance on remedies to guide our approach to resolution. This is outlined in our Complaints, Compliments, and Comments Policy (6.4) and Compensation Policy https://www.stonewater.org/about-us/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	We provide clear outline of our commitments in our complaint responses. We monitor completion, and close complaint cases once we know we've completed our follow up actions.
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	This is set out in our Complaints, Compliments, and Comments Policy and Compensation Policy. https://www.stonewater.org/about-us/policies/

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	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	We capture learning points from each complaint when we close it in our case processing system. This allows us to identify trends to inform and shape service improvements holistically, as well as in resolving individual cases.
6.7	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	Our approach to redress is set out in our Complaints, Compliments, and Comments Policy (6.4) and our Compensation Policy https://www.stonewater.org/about-us/policies/

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	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	We provide regular updates on learning from complaints to our customers. This includes in our Customer Annual Review (https://www.stonewater.org/about-us/performance/), Customer newsletters and on the Customer Hubb and website. We involve colleagues across Stonewater in identifying learning from complaints, and share it to inform service improvements.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	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 chair of our Customer Experience and Assurance Panel is our board lead for customer complaints.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable 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. 	Yes	The Board receives <ul style="list-style-type: none"> Annual out turn report on complaints, including volume, categories, outcomes, trends and learning Regular updates on complaint key performance indicators Quarterly updates on all HOS determinations and Complaint Handling Orders when issued Annual self-assessment against the Complaint Handling Code for scrutiny and challenge Annual performance report produced by the Housing Ombudsman Service

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7.5	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>Learning from complaints reports identify themes and issues from complaints to drive service improvement. These are shared with our Operational Directors Group and Chief Officers Group for scrutiny and challenge.</p> <p>Reflective learning sessions consider customer complaints, including all Housing Ombudsman Service determinations, to identify serious issues, learning and service improvements.</p> <p>Feedback from complaints is used directly in contractor management, and within training for colleagues and contractors.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	All colleagues share a PDR objective related to complaint handling.

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	This is reflected in our governance cycle.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This is reflected in our governance cycle and the board's delegations on sign off of restructures and changes in procedures.

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<p>8.3</p>	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • 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 • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	<p>Yes</p>	<p>Our board approved this self-assessment on 27th September 2023. It is shared at https://www.stonewater.org/supporting-you/making-a-complaint/ and in our 22/23 Customer Annual Review (https://www.stonewater.org/about-us/performance/)</p>
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