

Appendix B – 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	Quote
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	Included in the Complaints Policy, paragraph 3.1	Effective complaint handling should be a resident friendly process that enables residents to be heard and understood. The starting point for this is a mutual understanding of what constitutes a complaint. As stated in the Housing Ombudsman Complaint Handling Code, a complaint shall 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> ".
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	Included in the Complaints Policy, paragraph 4.3	Our staff are encouraged to actively identify complaints. A resident will not have to use the word "complaint" or to ask to "make a complaint". Staff will record any expression of dissatisfaction as a complaint and respond using this approach.

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	Included in the Complaints Policy, paragraph 5.3	If the resident's complaint cannot be resolved at the point of complaint, or if the resident requests it, it will be treated as a formal complaint and given to the appropriate member of staff, who will act as the impartial Investigating Complaints Officer for your complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>Included in the Complaints Policy paragraph 3.4 we outline what is not considered under the Complaints Policy.</p> <p>Included in the Complaints Policy, paragraph 3.5, we ensure that we inform the resident why we cannot accept the complaint.</p>	<p>3.4: Issues which we do not deal with under this process are:</p> <ul style="list-style-type: none"> ▪ A first request for a service, such as a repair. ▪ Neighbour disputes and anti-social behavior. ▪ Where legal action is being taken. ▪ When our insurers are dealing with an issue. ▪ When lodging a complaint, the cause of dissatisfaction must have occurred within the last six months for the complaint to be considered. ▪ Please refer to Section 8 for full details of exceptions under our Complaints Policy. <p>3.5: Where we are unable to accept a complaint, we will provide an explanation setting out the reasons why the matter is not suitable for the complaints process. Residents have the right to challenge the rejection of their complaint by referring their complaint to the Housing Ombudsman.</p>

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	<p>Included in the Complaints Policy paragraph 3.4 we outline what is not considered under the Complaints Policy.</p> <p>Included in the Complaints Policy, paragraph 3.5, we ensure that we inform the resident why we cannot accept the complaint.</p>	<p>3.4: Issues which we do not deal with under this process are:</p> <ul style="list-style-type: none"> ▪ A first request for a service, such as a repair. ▪ Neighbour disputes and anti-social behavior. ▪ Where legal action is being taken. ▪ When our insurers are dealing with an issue. ▪ When lodging a complaint, the cause of dissatisfaction must have occurred within the last six months for the complaint to be considered. ▪ Please refer to Section 8 for full details of exceptions under our Complaints Policy. <p>3.5: Where we are unable to accept a complaint, we will provide an explanation setting out the reasons why the matter is not suitable for the complaints process. Residents have the right to challenge the rejection of their complaint by referring their complaint to the Housing Ombudsman.</p>
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	Yes	Included in the Complaints Policy, paragraph 3.5	<p>3.5: Where we are unable to accept a complaint, we will provide an explanation setting out the reasons why the matter is not suitable for the complaints process. Residents have the right to challenge the rejection of their complaint by referring their complaint to the Housing Ombudsman.</p>

	process and the right to take that decision to the Ombudsman.			
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, paragraph 3.2	<p>A complaint could be made when a resident feels;</p> <ul style="list-style-type: none"> ▪ Dissatisfied with the standard of service provided by us or our contractors. ▪ Unhappy with our actions or decisions. ▪ Unhappy with a situation that they wish to have rectified ▪ We have failed to do something we should have done or have acted inappropriately. ▪ We have treated them unfairly or disrespectfully. ▪ We have failed to respond to their initial enquiries. ▪ We have failed to meet one of our resident service promises. ▪ We have failed to follow our policies or procedures.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing	Yes	We have reviewed this suggestion and have rethought how we respond to	Template response letters created for the Resident Engagement Officer to contact dissatisfied residents that have completed the Acuity survey.

	<p>the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.</p>		<p>resident responses to our Acuity survey. Now if we receive feedback that a resident is dissatisfied about something:</p> <ul style="list-style-type: none"> ▪ Our Resident Engagement Officer will initially contact the residents by telephone where they have given us permission to speak to them. ▪ The Resident Engagement Officer will pass the concerns onto the relevant team to rectify where possible. ▪ The resident will be informed that they can escalate their dissatisfaction to a stage one complaint if they wish to. This will be followed up in writing. 	<p>Template Letter - Response to Dissatisfied Resident Following Acuity Survey.docx</p>
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Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, paragraph 4.1	We want it to be easy for anyone to let us know that something has gone wrong for them. We will take a complaint from residents in writing, in person, over the telephone, by email, online via our website and social media channels, or through a third party. With third- party complaints, we will need to ensure that the person has permission to act on the complainant's behalf before we respond.
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	Included in the Complaints Policy, sections 5.4 and 5.5. This section makes it clear what steps are taken at stage 1 and stage 2.	Quotations not provided due to size of excerpt.
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	Included on our website, and our website link is included in all staff email signatures, and advertised in our newsletters.	Alternatively, you can type Innisfree Housing Association into Google, select the top option, and use the search bar on our website to search Complaint.

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Included in the Complaints Policy, paragraphs 4.4 and 4.5	<p>4.4: We are committed to embedding the 2010 Equality Act into our Policies and Procedures. As part of this commitment, we will facilitate reasonable adjustments and adapt our standard policies and procedures wherever possible, in order to ensure every individual can make a complaint.</p> <p>4.5: To make an adjustment means to change work practices to avoid or correct the disadvantage to a person with a disability. This may include:</p> <ul style="list-style-type: none"> ▪ Allowing more time than we would usually for someone to provide information that we need. ▪ Providing specialist equipment or additional support, such as a sign language interpreter.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>We publicise our complaints policy on our website and through our newsletter.</p> <p>We have created a new Complaint Handling leaflet for customers.</p>	N/A
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We include the Ombudsman's contact details in letters when acknowledging a complaint, and when providing a full response to a complaint, as well as in our Complaints	5.8: We are committed to embedding the Independent Housing Ombudsman's Guidelines for best practice into our policies and procedures. If the resident is not satisfied with the outcome of their complaint, they can refer their complaint to the Housing Ombudsman Service. The Housing Ombudsman contact details are as follows:

			Policy, paragraph 5.8, and on our website.	Housing Ombudsman Service P O Box 152, Liverpool, L33 7WQ Telephone 0300 111 3000 Email info@housing-ombudsman.org.uk
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	We include the Ombudsman's contact details in letters when acknowledging a complaint, and when providing a full response to a complaint, as well as in our Complaints Policy, paragraph 5.8, and on our website.	5.8: We are committed to embedding the Independent Housing Ombudsman's Guidelines for best practice into our policies and procedures. If the resident is not satisfied with the outcome of their complaint, they can refer their complaint to the Housing Ombudsman Service. The Housing Ombudsman contact details are as follows: Housing Ombudsman Service P O Box 152, Liverpool, L33 7WQ Telephone 0300 111 3000 Email info@housing-ombudsman.org.uk

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, paragraph 4.2.	4.2: If we receive a complaint through social media channels we will contact the complainant privately to address their concerns and follow this Policy, ensuring confidentiality and privacy is maintained.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, paragraph 5.3	5.3: If the resident's complaint cannot be resolved at the point of complaint, or if the resident requests it, it will be treated as a formal complaint and given to the appropriate member of staff, who will act as the impartial investigating Complaints Officer for your complaint.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Included in the Complaints Policy, paragraph 5.3	5.3: If the resident's complaint cannot be resolved at the point of complaint, or if the resident requests it, it will be treated as a formal complaint and given to the appropriate member of staff, who will act as the impartial Investigating Complaints Officer for your complaint. The Investigating Complaint Officer will: <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

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
3.3	<p>Complaint handlers should:</p> <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	Included in the Complaints Policy, paragraph 5.3	<p>5.3: If the resident's complaint cannot be resolved at the point of complaint, or if the resident requests it, it will be treated as a formal complaint and given to the appropriate member of staff, who will act as the impartial Investigating Complaints Officer for your complaint. The Investigating Complaint Officer will:</p> <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

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, sections 5.4 and 5.5 explain that we will acknowledge a complaint within 2 working days, following our Customer Service Standards and the Ombudsman's recommendations.	<p>Stage One 5.4: When we receive a complaint, the investigating Complaint Officer will acknowledge the complaint within 2 working days – they will outline the issue, explain how the complaint will be investigated, and inform the complainant that we aim to issue a full response within 10 working days.</p> <p>Stage Two 5.5: The Complaint Officer will acknowledge the complaint within 2 working days – they will outline the complaint and the remedies that the complainant is requesting to resolve the outstanding issues. They will explain how the stage 2 complaint will be investigated and inform the complainant that we aim to issue a full response within 20 working days.</p>
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	Yes	Included in the Complaints Policy, sections 5.4 and 5.5.	<p>Stage One 5.4.2 If any aspect of the complaint is unclear, the Complaint Officer will speak the complainant for clarification and a full definition will be agreed between both parties.</p>

	definition agreed between both parties.			<p>Stage Two</p> <p>5.5.4 If any aspect of the complaint is unclear, the Complaint Officer will speak the complainant for clarification and a full definition will be agreed between both parties.</p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Included in the Complaints Policy, sections 5.4.4 and 5.5.6	<p>Stage One</p> <p>5.4.4: The Complaint Officer will address all points raised in the complaint and:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 1 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, and have an open mind <p>Stage Two</p> <p>5.5.6: In their response to the stage 2 complaint, the Complaint Officer will address all points raised in the complaint, the stage 1 complaint, and any remedies requested by the complainant to resolve the complaint. Their response will:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 2 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, and have an open mind

4.7	<p>The complaint handler must:</p> <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	Included in the Complaints Policy, sections 5.4.4 and 5.5.6	<p>Stage One:</p> <p>5.4.4: The Complaint Officer will address all points raised in the complaint and:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 1 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, 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 ▪ Outline the findings of their investigation and the reasons for any decisions made ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter if the complainant remains dissatisfied <p>Stage Two</p> <p>5.5.6 In their response to the stage 2 complaint, the Complaint Officer will address all points raised in the complaint, the stage 1 complaint, and any remedies requested by the complainant to resolve the complaint. Their response will:</p>
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				<ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 2 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, 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 ▪ Outline the findings of their investigation and the reasons for any decisions made – they will include whether they agree or disagree with the findings made in the stage 1 complaint. ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter to the Housing Ombudsman if the complainant remains dissatisfied
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Included in the Complaints Policy, paragraph 5.3	If a resident requests that we contact them in a specific way or at certain times, we will endeavour to contact them in that manner where reasonable to do so.

4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Included in the Complaints Policy, paragraphs 5.4.4 and 5.5.7	<p>Stage One</p> <p>5.4.4 The resident, and if applicable any staff member who is the subject of the complaint, will be given a fair chance to set out their position and comment on any adverse findings before a final decision is made.</p> <p>Stage Two</p> <p>5.5.7 The resident, and if applicable any staff member who is the subject of the complaint, will be given a fair chance to set out their position and comment on any adverse findings before a final decision is made.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Included in the Complaints Policy, paragraphs 5.4.8 and 5.4.9	<p>5.4.8: Once a stage 1 response has been shared with the complainant - if the complainant accepts our reply, or no response is received from them within 28 working days, we will consider the complaint resolved.</p> <p>5.4.9: If the complainant is dissatisfied with the stage 1 response, they can let the Complaints Officer know that they would like the complaint considered at stage 2.</p>
4.14	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	Yes	Included in the Complaints Policy, paragraph 5.4.10	<p>5.4.10 The Complaints Officer will not escalate the complaint to stage 2 of this Policy if:</p> <ul style="list-style-type: none"> ▪ It is the first request for a service, such as a repair. ▪ The complaint is regarding neighbour disputes and anti-social behavior.

	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.			<ul style="list-style-type: none"> ▪ Legal action is being taken. ▪ Our insurers are dealing with an issue. ▪ The cause of dissatisfaction occurred more than six months ago. <p>Please refer to Section 8 for full details of exceptions under our Complaints Policy. On deciding to change or stop the process, the Chief Executive will ensure the resident has received a clear explanation as to why the decision has been made and will inform them of their right to approach the Housing Ombudsman Service.</p>
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	Innisfree use our Housing Management systems to log and manage each complaint at every stage.	N/A
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	Innisfree have an Unacceptable Behaviour Policy. This policy sets out the provisions that we have in place to deal with customers who display unacceptable behaviour in their contacts and requests for service. However, this does not affect their ability to engage with the Complaints Policy.	

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	Included in our complaint acknowledgement template letter.
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	Included in our Complaint Procedure; our Complaint Officers are trained to assess and resolve a complaint as quickly as is reasonable to do so, and where possible issue a full response to a complaint before the end of the 10 working days set out in Stage One.
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	Included in our complaint acknowledgement letter that the complaint can nominate a third party to discuss the complaint on their behalf. They will need to give permission for the third party to speak to us.
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	In cases where a complaint relates to either parties' legal obligations, our Complaint Officer will outline the obligations of both parties in our complaint response letter.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Our policies and procedures refer to Complaint Officers, when responding to complaints it may be necessary to specifically refer to members of staff who have been consulted or spoken to as part of the complaint review.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our Complaint Officer will contact the complainant if any clarification is needed,

			or where a complaint response may not be issued within the agreed timeframes.
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 have introduced a Complaint Satisfaction Survey to help Innisfree improve our services. https://forms.microsoft.com/e/wGt1i2UxNH
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	All complaints about staff members are referred to the Operations Director to investigate and respond. They will support and engage the staff member in the complaints process, and promote any necessary learning.
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	This is included in our Unacceptable Behaviour Policy, and reasonable adjustments are included in all of our policies.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaints Policy, paragraph 5.4.1	5.4.1 When we receive a complaint, the investigating Complaint Officer will acknowledge the complaint within 2 working days – they will outline the issue, explain how the complaint will be investigated, and inform the complaint that we aim to issue a full response within 10 working days.

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	Our Complaint Policy sets out the required timescales to respond to a complaint. Outstanding actions will continue to be tracked and actioned, and updates provided to the resident.	<p>5.4.4 In their response to the stage 1 complaint, the Complaint Officer will address all points raised in the complaint and:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 1 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, 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 ▪ Outline the findings of their investigation and the reasons for any decisions made ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter if the complainant remains dissatisfied
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	Included in the Complaints Policy (paragraph 5.4.4) and our complaint response template letters.	<p>5.4.4 In their response to the stage 1 complaint, the Complaint Officer will address all points raised in the complaint and:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 1 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, and have an open mind

				<ul style="list-style-type: none"> ▪ 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 ▪ Outline the findings of their investigation and the reasons for any decisions made ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter if the complainant remains dissatisfied
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	Included in the Complaints Policy (paragraph 5.4.4) and our complaint response template letters.	<p>5.4.4 In their response to the stage 1 complaint, the Complaint Officer will address all points raised in the complaint and:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 1 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, 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 ▪ Outline the findings of their investigation and the reasons for any decisions made

				<ul style="list-style-type: none"> ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter if the complainant remains dissatisfied
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Included in the Complaints Policy, paragraphs 3.4.9 to 3.4.11 inclusive.	Not quoted due to the size of the excerpt.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Included in the Complaints Policy, paragraphs 5.5.3 and 5.5.4	5.5.3 The Complaint Officer will acknowledge the complaint within 2 working days – they will outline the complaint and the remedies that the complainant is requesting to resolve the outstanding issues. They will explain how the stage 2 complaint will be investigated and inform the complainant that we aim to issue a full response within 20 working days.

				5.5.4 If any aspect of the complaint is unclear, the Complaint Officer will speak the complainant for clarification and a full definition will be agreed between both parties.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Included in the Complaints Policy, paragraph 5.5.9	5.5.9 If the complainant is dissatisfied with the response to the stage 1 response, they can let the Complaints Officer know that they would like the complaint considered at stage 2.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Included in the Complaints Policy, paragraph 5.5.2	5.5.2 We will escalate the complaint internally and a member of our Senior Management Team will take on the role of Complaint Officer at stage 2. This investigating Complaint Officer will not be the same person that considered the complaint at Stage 1.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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	Included in the Complaints Policy, paragraphs 5.5.3 and 5.5.8	<p>5.5.3 The Complaint Officer will acknowledge the complaint within 2 working days – they will outline the complaint and the remedies that the complainant is requesting to resolve the outstanding issues. They will explain how the stage 2 complaint will be investigated and inform the complainant that we aim to issue a full response within 20 working days.</p> <p>5.5.8 If they feel a full reply is not possible within the 20 working days, the Complaint Officer will explain this to the complainant and will remain in contact until a full reply is issued. We aim to issue a full response in the following 10 working days.</p>

<p>5.16</p>	<p>Landlords must confirm the following in writing to the resident at the completion of stage two 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 <p>and</p> <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. 	<p>Yes</p>	<p>Included in the Complaints Policy, paragraph 5.5.6</p> <p>Innisfree do not have a Stage Three complaint response.</p>	<p>5.5.6 In their response to the stage 2 complaint, the Complaint Officer will address all points raised in the complaint, the stage 1 complaint, and any remedies requested by the complainant to resolve the complaint. Their response will:</p> <ul style="list-style-type: none"> ▪ Explain that the complaint is being considered at Stage 2 of Innisfree's Complaint Policy ▪ Deal with the complaints on their merits ▪ Act independently, in an impartial manner, 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 ▪ Outline the findings of their investigation and the reasons for any decisions made – they will include whether they agree or disagree with the findings made in the stage 1 complaint. ▪ Explain the details of any remedy offered to put things right, and offer an apology where appropriate ▪ Detail any outstanding actions ▪ Explain how to escalate the matter to the Housing Ombudsman if the complainant remains dissatisfied
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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.	N/A	N/A
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none">• 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	N/A	N/A

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
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	Included in the Complaint Policy, paragraph 5.5.8	5.5.8 If they feel a full reply is not possible within the 20 working days, the Complaint Officer will explain this to the complainant and will remain in contact until a full reply is issued. The extension period should be agreed by both parties. We aim to issue a full response in the following 10 working days.

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	Each letter sent to the complainant throughout the complaints process includes details of how to contact the Housing Ombudsman should they remain dissatisfied with how the complaint is being handled.	
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	Included in the Complaints Policy, paragraph 5.4.3	5.4.3 During their investigation the Complaint Officer may speak to the complainant and any relevant parties, including Innisfree staff members and contractors. They may also review the resident's tenant file and relevant information held regarding the complaint. If the problem is a recurring issue, the Complaints Officer will consider any older reports as part of the background to the complaint to help resolve the issue for the complainant.
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	Included in the Complaints Policy, paragraph 5.4.6	5.4.5 If the complainant wishes to add additional points to their complaint, the Complaint Officer will include the points into the stage 1 response if they are relevant and the stage 1 complaint has not been issued. If the stage 1 complaint has been issued or it would unreasonably delay the response, we will consider the newly raised points as a new complaint.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Quote
5.14	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	Included in the Complaints Policy, paragraph 5.5.8	5.5.8 If they feel a full reply is not possible within the 20 working days, the Complaint Officer will explain this to the complainant and will remain in contact until a full reply is issued. The extension period should be agreed by both parties. We aim to issue a full response in the following 10 working days.
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	Each letter sent to the complainant throughout the complaints process includes details of how to contact the Housing Ombudsman should they remain dissatisfied with how the complaint is being handled.	N/A

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 <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	N/A

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	N/A
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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	Innisfree communicate how we are remedying the situation and any redress warranted through our complaint response letters.
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.		
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.		
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 considered through our Compensation Policy.

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	Innisfree communicate how we apologise, how we plan to remedy the situation, and any redress warranted through our complaint response letters.
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	This is considered through our Compensation Policy and our Disrepair Policy.

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 a report on complaints received and lessons learned to our Board Members quarterly. We also report our performance and lessons learned on Complaints through our newsletter and annual report.

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.	No	Complaints are reported to all members of our Board on a quarterly basis, including: <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.
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	
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	All complaints are reviewed by the Senior Management Team and reported to Board Members. An annual review of themes and trends is carried out and these are reported in our Q4 performance reports. Regular complaints training is held with staff.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:	Yes	These values are shared with all employees through complaints handling training sessions held regularly.

	<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. 		
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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	Our most recent self-assessment was carried out in July 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Whilst this has not been necessary yet, we will comply where relevant.
8.3	Following each self-assessment, a landlord must: <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 	Yes	We report the self-assessment to our Board annually, and publish the assessment on our website and in our annual report.