

Housing Ombudsman Complaint Handling Code SGH

Homes Self-Assessment

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	The Housing Ombudsman's definition of a complaint has been incorporated within SGH Complaints Policy and is embedded within our complaint handling procedures.
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	Our policies and procedures are designed to ensure that customer enquiries are assessed in a manner which determines whether an enquiry constitutes a complaint, and what the most appropriate course of action is. In some instances, the customer may request that their concern is handled informally, in others it may be deemed more appropriate to automatically escalate the matter to a complaint stage. Our Complaint Policy was reviewed May 2023 to ensure that all complaints, however received, are handled consistently and in line with our complaints policy.
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	In the case of informal complaints handled by SGH, should the customer concern not be resolved within one business day, the matter is automatically escalated to Stage 1. Customers have the right to request that their concern is escalated at any time.

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>The exclusions in our policy are based on factual circumstances, aiming to avoid any inconsistency or subjectivity when a complaint is rejected. This approach ensures fairness and consistency for residents.</p> <p>We consistently evaluate our Complaint Policy to guarantee its clarity, conciseness, and comprehensibility for our customers. This evaluation includes the section related to policy exceptions.</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 process and the right to take that decision to the Ombudsman.	Yes	We are committed to providing a thorough explanation to the complainant whenever their complaint is not accepted. This explanation is provided in writing and adheres to our Complaint Resolution Policy. Additionally, all correspondence related to the complaint includes information about the Housing Ombudsman Service.

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	Section titled 'What is a Complaint' of our Complaint Policy outlines (with examples) the difference between a complaint and a service request. These principles are embedded within our internal complaint handling procedures.

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	Yes	At SGH, we take proactive steps to reach out to customers who express dissatisfaction through our satisfaction surveys.
	how they can pursue their dissatisfaction as a complaint if they wish to.		This proactive process involves gathering additional information, triaging the concerns raised by customers, and, whenever feasible, implementing suitable resolutions. In cases where a resolution cannot be reached, we promote the utilisation of our Complaints Policy.

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	Our Complaints Policy details the multiple routes available to customers who wish to submit a complaint. These include online, phone, email, post and Whatsapp.
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	You can find SGH's Complaints Policy on our website, conveniently located in the "Policies" section. Our policy is designed to provide a clear, concise, and customer-friendly explanation of every aspect of the complaint process. We strive to ensure that our customers can easily understand and navigate through the policy.

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	Furthermore, our website's "Contact Us" section provides comprehensive information on all available communication channels for our customers to reach us. Additionally, we offer a web-form specifically designed for customers to submit their complaints directly to us.
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<p>2.5</p>	<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>	<p>Yes</p>	<p>SGH maintains compliance with the Equality Act 2010. We do not have a stand-alone Reasonable Adjustments policy; however, the following policies contain details of the reasonable adjustments available to customers:</p> <ul style="list-style-type: none"> • Repairs policy (adaptations to homes) • Equality and Diversity policy (our equality objectives) • Customer charter (tailoring our services) • Tenant handbook (adaptations to homes, and providing extra support to vulnerable customers)
<p>2.6</p>	<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>	<p>Yes</p>	<p>We ensure that our residents are aware of their right to complain through various communication channels.</p> <p>Whenever we identify that customers may be facing issues or if we determine that an issue meets the criteria for a complaint, we inform them about our early intervention and escalation process right from the initial point of contact.</p> <p>Furthermore, we utilize other means of communication, such as newsletters and our Annual Report, both of which are distributed to customers and published on our website, to promote our complaints service.</p>

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We prominently display the contact information of the Housing Ombudsman in all our complaint correspondence, on our website, and in general communication with customers.</p> <p>Lastly, our Complaints Policy can be accessed on our website for reference.</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>Throughout every stage of the complaint process, we proactively promote the Housing Ombudsman Service and provide its contact details to our customers.</p> <p>Our Complaints Policy explicitly advises our customers that they have the option to reach out to the Housing Ombudsman for assistance and independent advice at any point during the complaints process. We encourage residents to utilize this resource if needed.</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	Complaints may be submitted via our website via an online web form. All complaints submitted to SGH, regardless of how they are received, are processed in accordance with our two-stage process. Customers are informed of how we maintain their confidentiality and privacy via a link to our Privacy policy which is included within our Complaint Policy.

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	Our Director of Governance has responsibility for complaint handling and is supported by the company secretary. Together they make up the complaints team. The Director of Governance is our nominated "complaints officer".
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our complaint handlers will undergo comprehensive training and possess a high level of proficiency in our complaint handling procedures. They will be consistently monitored according to our quality management framework to ensure their performance meets the required standards. The Complaints Team operates autonomously and remains impartial in their decision-making process.

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	<p>As the resident Ambassadors, the complaints team operates autonomously, and their primary objective is to ensure customer focussed resolutions to complaints.</p> <p>The complaints team assumes the responsibility of managing the complainant's relationship, overseeing complaint investigations, and handling the entire complaint process until its resolution.</p> <p>The final decision on upholding or rejecting complaints rests with the Director of Governance Team, who collectively have the authority to agree upon suitable resolutions and actions.</p> <p>They also have the discretion to determine additional remedies for residents, including compensation and goodwill payments.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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<p>4.1</p>	<p>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.</p>	<p>Yes</p>	<p>We have implemented an early resolution process to handle complaints in an informal manner. We prioritize resolving these complaints promptly while ensuring residents are informed of their option to pursue a formal investigation if desired.</p> <p>All cases addressed through the early resolution process are diligently recorded in our housing management system and reported centrally for transparency and monitoring purposes. It is crucial that these cases are resolved within one business day. If a resolution cannot be achieved within this timeframe, the matter automatically advances to Stage 1 of our formal complaints process, unless an alternative arrangement has been agreed upon with the complainant.</p> <p>In accordance with our policy all complaints will be acknowledged within 2 working days.</p>
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<p>4.2</p>	<p>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.</p>	<p>Yes</p>	<p>Upon receiving a complaint, our case handlers will promptly reach out to the residents via telephone to acknowledge the receipt of the complaint. They will formally introduce themselves, establish a rapport, and clarify their role in the process. During this initial call, the case handler's objectives are to understand the grounds for the complaint, gather any additional information necessary for the investigation, and collaboratively agree on the desired outcome.</p> <p>Furthermore, the case handler will discuss and determine the next steps in the complaint resolution process, as well as establish a mutually agreed-upon communication schedule. As part of our commitment to providing flexible options, residents are also offered the possibility of a video call for further engagement and support.</p>
<p>4.6</p>	<p>A complaint investigation must be conducted in an impartial manner.</p>	<p>Yes</p>	<p>As the resident ambassador, the Complaints Team operates autonomously and impartially, dedicated to providing customer-focused resolutions to complaints.</p> <p>The team will take charge of coordinating complaint investigations and holds the authority to determine whether complaints should be upheld or dismissed. They are also responsible for agreeing upon any necessary corrective actions to effectively address the complaints.</p> <p>Moreover, the team has the autonomy to negotiate and agree upon compensation and goodwill payments with residents to ensure appropriate resolutions are reached.</p>

<p>4.7</p>	<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. 	<p>Yes</p>	<p>Our complaint handlers will undergo comprehensive training to equipped them with various process and system controls to gather the necessary information and evidence for resolving complaints in a structured and methodical manner. This approach ensures a balanced and consistent approach to case investigations.</p> <p>By operating independently from our service delivery teams, our complaints team maintains an open-minded and impartial stance, allowing them to objectively evaluate each complaint without any bias or influence from other departments or individuals.</p> <p>This independence enhances the integrity of the complaint resolution process and promotes fair outcomes for all parties involved.</p>
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<p>4.11</p>	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication</p>	<p>Yes</p>	<p>During the introductory acknowledgement process, which occurs within two working days of receiving the complaint, the contact approach is mutually agreed upon with the resident. This includes determining the preferred method and frequency of communication that best suits their needs and ensures effective engagement throughout the complaint resolution process.</p> <p>To keep residents informed and updated on the progress of their complaint, we also utilize SMS milestone updates. These text messages serve as timely notifications, providing residents with regular updates on the status of their complaint, milestones achieved, and any significant developments. This proactive communication approach aims to keep residents informed and maintain transparency throughout the complaint handling process.</p>
<p>4.12</p>	<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. 	<p>Yes</p>	<p>Our introductory acknowledgement and internal investigation processes are designed to provide a fair and inclusive platform for all interested parties involved in the complaint. During these processes, we ensure that all parties have the opportunity to express their positions, present their perspectives, and submit any relevant evidence.</p> <p>We value open communication and encourage residents, as well as any other relevant parties, to provide their accounts of events, share supporting documentation, or submit any evidence they deem relevant to the complaint. This ensures that all perspectives are considered, and a comprehensive understanding of the situation is achieved, leading to a more thorough and fair investigation.</p>

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The timescales associated with each complaint stage are detailed within our Complaint Policy.
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 a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We would not refuse to escalate a complaint unless it was deemed that the complaint was vexatious or covered by the exclusions within the Complaint Policy.
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	All information, correspondence and evidence pertaining to complaints is stored within our housing management system.
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	SGH has a ZeroTolerance Policy that sets out our approach to unacceptable behavior.

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	<p>As part of our introductory acknowledgement process, we make it a priority to set clear expectations and reach an agreement on the desired outcome with residents. This crucial step takes place within two working days of receiving the complaint.</p> <p>To ensure effective communication and transparency, our dedicated case handlers will maintain regular contact with residents throughout the complaint resolution process.</p> <p>They will provide timely progress updates whenever there are changes in the circumstances or significant developments related to the complaint.</p> <p>In the event of a potential delay in reaching a resolution, we will make it a priority to communicate this information to the resident as soon as possible. By keeping them informed of any expected delays, we aim to manage expectations and maintain open lines of communication to minimise any potential frustrations.</p>
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	<p>At SGH, we prioritise resolving complaints at the earliest opportunity. However, in situations where it becomes apparent that a complaint may not be resolved within the designated timescales outlined in our Complaint Policy, our case handlers are committed to promptly informing the resident.</p> <p>As soon as our case handlers become aware of any likely delay in resolving the complaint, they will proactively communicate this information to the complainant. This ensures that the</p>

			complainant is kept informed and can adjust their expectations accordingly. By providing timely updates on any potential delays, we aim to maintain transparency, manage expectations, and demonstrate our commitment to addressing the complaint in a thorough and efficient manner.
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	Residents may nominate a representative to deal with the complaint on their behalf. This is specified in our Complaints Policy under the section 'Who can complain.'
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	The legal obligations of both parties are always set out to the residents in our responses, and where necessary, an explanation of the obligation(s) is provided to ensure that the complainant has full understanding.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Staff/representative confidentiality is always maintained.

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our case handlers will regularly utilise several communication methods to ensure residents remain informed about the progress of their complaint. These methods include, phone, text, email, letter and WhatsApp.
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	<p>Before closing a complaint, our case handlers will engage in a discussion with the resident to share their findings, communicate the outcome, and agree on any necessary actions.</p> <p>They will ensure that the customer is content with the resolution and satisfied with the overall handling of the complaint before officially closing the case.</p> <p>Following the closure of a complaint, we will send or carry out a customer satisfaction survey with the resident. The feedback we receive from these surveys plays a valuable role in supporting staff development and driving ongoing learning and improvement initiatives within our organisation.</p>
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	<p>Updates on complaint performance, themes, and learning and continuous improvement opportunities will be regularly communicated to all staff, including our service delivery partners.</p> <p>A cross-functional learning and continuous improvement framework has also been embedded to ensure that staff can review, discuss, and learn from complaints.</p>
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	Our Zero Tolerance Policy ensures that our customers are treated fairly and consistently, whilst at the same time protecting the health, safety and wellbeing of our staff and service delivery partners.

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	Our complaints policy provides for response time of 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	We will set target to monitor response time to ensure that complaints are resolved swiftly. responses will be sent to residents within are published complaints management procedure as soon as possible if the answer to the complaint is known.

<p>5.6</p>	<p>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.</p>	<p>Yes</p>	<p>As an integral part of the investigation process, we have implemented a structured and personalised introductory acknowledgement process. This process ensures that we comprehensively understand all aspects of the complaint from the very beginning, including the desired outcome expressed by the resident.</p> <p>To ensure consistency and customer-friendliness, our case handlers utilize a repository of template email/letter responses.</p> <p>These templates were developed from the Housing Ombudsman published templates, are designed to cover all pertinent information related to a complaint, allowing our case handlers to respond in a structured manner while maintaining a consistent and customer-friendly approach in written correspondence.</p> <p>This approach enables efficient communication and ensures that all relevant details are addressed appropriately.</p>
<p>5.8</p>	<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 <p>details of how to escalate the matter to stage two if the resident is not satisfied with the answer</p>	<p>Yes</p>	<p>Staff are trained and competent in the delivery of all of these principles.</p> <p>Our quality assurance framework ensures that the principles are applied correctly and consistently.</p> <p>A residents right to escalate their complaint is included in all complaint correspondence.</p>

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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<p>5.9</p>	<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. 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>	<p>Yes</p>	<p>Our Complaints policy outlines the escalation procedure.</p> <p>In circumstances where a complaint is rejected, an explanation in writing is always provided to the complainant.</p> <p>All complaint correspondence includes details of the Housing Ombudsman Service.</p>

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	Up on receipt of a Stage 2 escalation, the introductory acknowledgement procedure is initiated (as per Stage 1).
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	Our Complaint policy details the escalation process.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1. For our Supported living schemes Stage 1 complaints are handled by our service delivery partners and stage 2 and

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	If it is likely that a complaint may not be resolved within the timescales outlined in our Complaint Policy, our case handlers will inform the resident as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant.
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 response.	Yes	Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the resident and the Housing Ombudsman referral process would be initiated.
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	A comprehensive review of the resident's tenancy/case history will always be conducted using our housing management system as standard

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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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	SGH operates a two-stage complaints process.
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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	SGH does not operate a third stage.
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Best practice 'should' requirements

Stage 1

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	If it is likely that a complaint may not be resolved within the timescales outlined in our Complaint Policy, our case handlers will inform the resident as soon as they become aware of any likely delay and any extension is agreed in consultation with the resident.
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		Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the complaint and the Housing Ombudsman referral process would be initiated.

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	SGH does not operate a third stage.
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	SGH does not operate a third stage.

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	Resolution outcomes are agreed with complainants prior to a complaint case being closed and our written responses provide a full explanation on what has gone wrong, and the action taken to put things right.
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	Our approach to remedies and financial redress are set in accordance with our published policies and procedures.
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	As above
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	As above

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 will consider the nature of complaints holistically with a view of assessing the efficiency of our systems and processes. We will adopt a 'lesson learnt' approach to complaint management.
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	Yes	Where a resident has a statutory right to redress we will seek independent legal assurance on the best approach in managing the complaint.

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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	<p>On a monthly basis, we aim to communicate our complaints performance, thematic complaint trends, and continuous learning outputs to all staff. This ensures that everyone is informed about our progress in handling complaints and provides valuable insights for continuous improvement.</p> <p>In addition to regular updates, we also share ad-hoc information with staff, including sector-wide news and updates from the Housing Ombudsman. This ensures that our staff are kept up to date with relevant industry developments and regulatory changes.</p> <p>To effectively share complaints information with residents, we employ various engagement methods. This includes publishing an Annual Report that provides a comprehensive overview of our complaints handling activities.</p> <p>In the future we will start to develop scrutiny panels and a Customer Complaint Forum, creating opportunities for residents to participate, provide feedback, and actively contribute to the improvement of our complaint resolution processes. These engagement methods foster transparency, accountability, and collaboration with our valued residents.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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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 Director of Governance has lead responsibility for complaints and is a member of the governing body.
7.4	<p>As a minimum, governing bodies should receive:</p> <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 	Yes	<p>Quarterly and annual reports will be provided to our Board. These reports will include detail on the volume of complaints at each stage, our performance, learning outcomes and trend analysis.</p> <p>Additionally, all Housing Ombudsman determinations, case detail and orders are also</p>
	<ul style="list-style-type: none"> • 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. 		<p>reported. Where cases of severe maladministration are identified, more intensive reviews are conducted, and management actions are identified and tracked.</p> <p>We also maintain a complaint register for housing ombudsman cases.</p> <p>Our assurance framework includes the annual self-assessment against the code.</p>
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	To facilitate continuous learning and improvement, we have implemented a framework that ensures learning outcomes from complaints are shared and used to inform actions and training for both staff and contractors. This framework allows us to translate the insights gained from complaints into actionable steps that enhance our practices and ensure ongoing development and improvement in our operations.

			By consistently providing the Senior Leadership Team with comprehensive reports and utilizing a robust framework for learning and action, we create a culture of responsiveness and continuous improvement within our organisation.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with staff 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	SGH will review and set key performance indicators that aim to help drive the culture required to meet the standards set out in the Housing Ombudsman's code and set by the Chartered Institute of Housing.

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 compliance with the Complaint Handling Code will be continuously evaluated. This is our first assessment. As we are still in the start up phase many of our processes are still being embedded, developed and tested.

8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As above
8.3	<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 	Yes	The Board will receive updates on the outcome of our self-assessment through our formal Annual Complaints Report. We publish the self-assessment on our website and include will include it in our annual reports.