

# HOUSING OMBUDSMAN COMPLAINT HANDLING CODE: SELF-ASSESSMENT 2023

The Housing Ombudsman Service's Complaint Handling Code sets out good practice that will allow landlords to respond to complaints effectively and fairly.

Key areas in the Code include a universal definition of a complaint, providing easy access to the complaints procedure and ensuring residents are aware of it (including their right to access the Housing Ombudsman Service, the structure of the complaints process, fairness and a resident-focused process, taking action to put things right and appropriate remedies, and creating a positive complaint handling culture through continuous learning and improvement.

The Housing Ombudsman Service requires landlords to undertake a self-assessment against the new Code and publish the results as an annual exercise. Barnet Homes (on the behalf of the registered **provider the London Borough of Barnet**) has completed its annual self-assessment for 2022/23, and finds that it is compliant with the Code. This self-assessment was reviewed by the Barnet Homes Board on 21 September 2023.

Housing Ombudsman Service Self-Assessment requirements:

- 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	Code Requirement	Comply	Evidence, Commentary, and any Explanations
<b>Section 1 - Definition of a complaint</b>			
Mandatory requirements			
1.2	A complaint must be defined as: '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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Barnet Homes' complaints policy is a policy for The Barnet Group that covers complaints related to social housing landlord services (Barnet Homes and Opendoor Homes), homelessness and allocations services (Barnet Homes) and adult social care (Your Choice (Barnet)). The Complaints and Compliments Policy has adopted the HOS definition of a complaint; however, as a range of services within the Group are provided on behalf of the London Borough of Barnet or in connection with social housing, the definition has been extended with additional information. This is in line with the Local Government and Social Care Ombudsman's complaints guidance, to which Barnet Homes is also subject, as we do not consider it to be reasonable nor practical to maintain multiple complaints policies. The additional information has also been agreed with our Resident Board as providing useful guidance to complainants.</p> <p>Complaints and Compliments Policy:</p> <p><b>5.1 What is a complaint?</b></p> <p><i>5.1.1 The Barnet Group defines a complaint as being an expression of dissatisfaction, however made and whether justified or not, about the standard of service it has provided, or actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers. A customer does not need to use the word 'complaint' for it to be treated as such. The dissatisfaction can be with service failures including, but not limited to:</i></p> <ul style="list-style-type: none"> <li>- the quality of the service provided or the work carried out;</li> <li>- the action or lack of action taken by staff;</li> <li>- the attitude or behaviour of staff;</li> <li>- missed appointments;</li> <li>- a failure to comply with policy, procedure, or standards of service delivery; or</li> <li>- cost.</li> </ul>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Clause 5.1.1 of the Complaints and Compliments Policy states that <i>A customer does not need to use the word 'complaint' for it to be treated as such.</i></p> <p>Clause 2.3 of the Complaints and Compliments Policy states that complaints will be welcomed from <i>all residents, service users, and clients, advocates on their behalf, and non-customers who are affected by its services</i>, which includes <i>other third parties and advocates acting with permission on behalf of a customer (excluding legal representatives who write to us with a view to take legal action).</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4 Managing complaints</b>  <i>5.4.1 We aim to resolve expressions of dissatisfaction as soon as possible, informally, at the “first point of contact”. This may take the form of an apology, explanation of what has happened, or agreeing actions to be taken to resolve the situation. If further enquires are needed to resolve the matter, or if a customer tells us they wish to make a formal complaint we will move to Stage 1 of our two-stage process.</i></p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><i>5.1.3.1 We will accept a complaint unless there is a valid reason not to do so. If the issue is not a complaint within the definition of this policy, we will deal with it through the relevant alternative procedure, where applicable. Making a complaint may also not be the best route for resolving some issues; this might be because the issue is outside of our control or because there is another appeal process, although you may complain about this if we fail to manage this effectively.</i></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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.1.3 Complaints not covered by this policy</b>  <i>5.1.3.1 We will accept a complaint unless there is a valid reason not to do so. If the issue is not a complaint within the definition of this policy, we will deal with it through the relevant alternative procedure, where applicable. Making a complaint may also not be the best route for resolving some issues; this might be because the issue is outside of our control or because there is another appeal process, although you may complain about this if we fail to manage this effectively.</i></p> <p><i>5.1.3.2 Matters that are excluded under this policy and will not be dealt with as a complaint include:</i></p> <ul style="list-style-type: none"> <li><i>• complaints submitted six months or more after the issue occurred and being brought to The Barnet Group's attention for the first time. Exceptions may be made at the discretion of the Complaints and Information team, particularly if a complaint concerns a safeguarding or health and safety issue, or if illness or personal circumstances have prevented the complaint being reported to us;</i></li> <li><i>• matters that have already been considered under the Complaints and Compliments Policy, where we are satisfied that a complete and fair response has already been provided;</i></li> <li><i>• a first request for service (such as a repair), information, or an explanation of our policies and procedures;</i></li> <li><i>• neighbour disputes or complaints about the conduct or behaviour of another resident (including anti-social behaviour, hate crime, or domestic violence), unless the complaint refers to our failure to deal with a disagreement appropriately;</i></li> <li><i>• a dispute about the amount of rent or service charge being charged, unless the complaint refers to our failure to apply our processes appropriately;</i></li> <li><i>• a claim being dealt with by our insurers;</i></li> <li><i>• issues where the customer or The Barnet Group has commenced legal action;</i></li> <li><i>• appeals against policy decisions or services where there is another appeal process, (e.g., disrepair or housing applications), another review process (e.g., potential or actual data protection breaches or internal reviews regarding Freedom of Information Act requests), or where there is an alternative statutory appeal or tribunal processes (including appeals against statutory Notices);</i></li> <li><i>• services for which The Barnet Group is not responsible (e.g., council-provided services);</i></li> <li><i>• where the complainant is an employee of The Barnet Group (unless they occupy a property owned or managed by The Barnet Group and the complaint relates to issues with their tenancy or landlord services); and/or</i></li> <li><i>• complaints that have already been decided by a court or independent tribunal.</i></li> </ul>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><i>1.2 The Complaints and Information team will review the complaint and make a decision about whether it is accepted under the Complaints and Compliments Policy. If the complaint is found to not be suitable for the complaints process, the Complaints and Information team <b>must</b> write to the complainant to explain the reasons for this, which will be as described in the policy, and inform the complaint of their right to take the decision to an Ombudsman, as appropriate to the subject of the complaint.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
Best practice requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.1 What is a complaint?</b>  <i>5.1.1 The Barnet Group defines a complaint as being an expression of dissatisfaction, however made and whether justified or not, about the standard of service it has provided, or actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers. A customer does not need to use the word 'complaint' for it to be treated as such. The dissatisfaction can be with service failures including, but not limited to:</i></p> <ul style="list-style-type: none"> <li>• the quality of the service provided or the work carried out;</li> <li>• the action or lack of action taken by staff;</li> <li>• the attitude or behaviour of staff;</li> <li>• missed appointments;</li> <li>• a failure to comply with policy, procedure, or standards of service delivery; or</li> <li>• cost.</li> </ul> <p>[...]</p> <p><b>5.1.3 Complaints not covered by this policy</b>            [...]</p> <p><i>5.1.3.2 Matters that are excluded under this policy and will not be dealt with as a complaint include:</i></p> <ul style="list-style-type: none"> <li>• [...]</li> <li>• a first request for service (such as a repair), information, or an explanation of our policies and procedures;</li> </ul>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Partially	<p>Barnet Homes uses survey feedback to inform its service improvement focus. A large number of our satisfaction surveys are completed by telephone, either by an independent company on our behalf or by our officers. The staff completing the surveys are briefed to, wherever possible, raise complaints if the resident wishes for this to happen, and/or to follow up on issues to seek a resolution. We have chosen not to list in our Complaints and Compliments Policy "through satisfaction surveys" as a way to raise complaints, as we would not have sufficient confidence that the timescales of the Complaint Handling Code and our policy would be met in all instances, and believe there would be a risk to a complaint not being formally considered. We will continue to encourage staff and our contractor to give appropriate advice to residents if they are dissatisfied when giving feedback through a satisfaction survey.</p>
Section 2 - Accessibility and awareness			
Mandatory requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.2 Making a complaint</b>            [...]</p> <p><i>5.2.2 If something goes wrong, we want to make it easy for customers to make a complaint. Complaints can be made in several ways, including:</i></p> <ul style="list-style-type: none"> <li>• by email               <ul style="list-style-type: none"> <li>o Barnet Homes - <a href="mailto:Talk2Us@barnethomes.org">Talk2Us@barnethomes.org</a></li> <li>o [...]</li> </ul> </li> <li>• through our websites               <ul style="list-style-type: none"> <li>o Barnet Homes – <a href="http://www.thebarnetgroup.org/bh/contact-us/">www.thebarnetgroup.org/bh/contact-us/</a></li> <li>o [...]</li> </ul> </li> <li>• by telephone               <ul style="list-style-type: none"> <li>o Barnet Homes and Your Choice (Barnet) - 020 8080 6587</li> <li>o [...]</li> </ul> </li> <li>• by letter               <ul style="list-style-type: none"> <li>o Complaints and Information team, The Barnet Group, 3rd Floor, 2 Bristol Avenue, London, NW9 4EW</li> </ul> </li> <li>• through our corporate social media (to maintain confidentiality and privacy we will ask the individual to contact us with more detail by direct (private) message or through the options above so that we can investigate the matter);</li> <li>• in person (e.g., at reception, during a home visit, or at the place people are supported); or</li> <li>• by asking someone to tell us for you (with permission, including a family member, friend, advocate, or support worker).</li> </ul>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Complaints and Compliments Policy sets out the number of stages, what will happen at each stage, and the timeframes for responding. Following review by involved residents, we have added two diagrams showing the timescales and steps involved at Stage 1 and Stage 2. The Policy is published on our website, and our process is promoted in each edition of the tenant newsletter and residents are advised in person or over the telephone as appropriate. Our website includes a dedicated Complaints page that sets out a summary of the stages, timescales, and what to expect. This information is also provided in a complaints leaflet on the website, and an Easy Read document about making a complaint.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	As above (2.3). The Complaints page is accessible under the "Contact Us" page menu, and is within the first two search results returned if the term "complaint" is entered on the website. The Complaints page includes the policy, leaflet, and Easy Read guide, as well as a summary of the process on the page copy itself.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>A Reasonable Adjustments to Services Policy is in place that sets out how we will be responsive to requests from disabled residents.</p> <p>Complaints and Compliments Policy:</p> <p><b>6. EQUALITIES</b></p> <p><i>6.1 The Barnet Group is committed to promoting equality of opportunity, fairness, and accessibility. We recognise that all customers should be treated equally and fairly regardless of their age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, and we will not directly or indirectly discriminate against any person or group in implementing this policy and its associated procedure.</i></p> <p><i>6.2 We will act sensitively towards the diverse needs of individuals and communities, and may provide communications in alternative formats where practicable and appropriate to assist customers with distinct communication needs. Exceptions may be made to this policy to accommodate an individual's needs, and The Barnet Group will consider requests for reasonable adjustments in line with the Equality Act 2010.</i></p> <p><i>6.3 We will support customers who require assistance to make a complaint. Customers may also be signposted to external agencies for independent support or advocacy where appropriate. Information about support available can also be found on our websites:</i></p> <p><i>• Barnet Homes - <a href="http://www.barnethomes.org/complaints">www.barnethomes.org/complaints</a></i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Barnet Homes' website contains a dedicated page to complaints at <a href="http://www.barnethomes.org/complaints">www.barnethomes.org/complaints</a> . This page includes an overview of the process, our Complaints and Compliments Policy, a complaints leaflet that summarises our process, and an Easy Read guide to complaints. It also includes our self-assessment against the Housing Ombudsman's Complaint Handling Code and a link to the Code, and information about how to contact the Housing Ombudsman and Local Government and Social Care Ombudsman, as well as other organisations that may be able to provide support to make a complaint. In every edition of our resident newsletter atHome we publish information about making a complaint, including information about the Housing Ombudsman, and we refer residents to our website for more information.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	In every edition of our resident newsletter atHome we publish information about making a complaint, including information about the Housing Ombudsman, and we refer residents to our website for more information. We also provide information to residents at the point of contact if they are dissatisfied with something.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><i>1.3 If the complaint is accepted under the policy, the Complaints and Information team <b>must</b> send an acknowledgement email or letter to the complainant. The acknowledgment <b>must</b> provide:</i></p> <ul style="list-style-type: none"> <li><i>• [...]</i></li> <li><i>• (if the complaint is about landlord services) advice for the complainant about their right to access the Housing Ombudsman Service throughout their complaint, to afford the resident the opportunity to engage with the Ombudsman's dispute support advisors for impartial advice. The wording for this, for the Complaints and Information team's use, is included in Appendix 2 of this procedure.</i></li> </ul> <p>Appendix 1 of the Complaint Handling Procedure – standard wording for acknowledgements to landlord services complaints:</p> <p><i>If you would like to seek impartial advice, you have the right to contact the Housing Ombudsman Service's dispute support advisors at any time during our handling of your complaint. The Housing Ombudsman Service can be contacted at:</i></p> <p><i>Address: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ</i>  <i>Telephone: 0300 111 3000</i>  <i>Website: <a href="http://www.housing-ombudsman.org.uk">www.housing-ombudsman.org.uk</a></i></p>



Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
Best practice requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><i>5.2 Making a complaint</i>  <i>[...]</i>  <i>5.2.2 If something goes wrong, we want to make it easy for customers to make a complaint. Complaints or expressions of dissatisfaction can be received in several ways:</i>  <i>[...]</i>  <i>• through our corporate social media (to maintain confidentiality and privacy we will ask the individual to contact us with more detail by direct message or through the options above so that we can investigate the matter)</i></p>
Section 3 - Complaint handling personnel			
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”.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Barnet Homes has a Complaints and Information team that is responsible for overseeing the overall complaints process, raising the profile of complaints across the business, and providing performance reporting to the board, senior management, the Resident Board scrutiny group, and to all residents through the newsletter and website. The Complaints and Information team is an experienced team of three individuals who receive regular training and briefings on complaints-handling as required. The team sits within the Strategy and Compliance service in the Growth and Development directorate; this separation of the “corporate” complaints function from the operational teams helps to ensure an unbiased approach with no conflicts of interest.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints handlers are, for most services, directly within the relevant service to ensure ease of access to required personnel, a knowledgeable approach, and consistency, as well as ensure accountability and ownership of the service to make improvements. Services select complaints handlers based on skills and they are required to act impartially. Complaint handlers receive ad-hoc briefings and training on complaint handling and our process for dealing with complaints.</p> <p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.10 The Stage 1 complaint handler's complaint investigation <b>must</b> be conducted in an impartial manner, seeking sufficient, reliable information from both the complainant and the business so that fair and appropriate findings and recommendations can be made. The Stage 1 complaint handler should ensure they are empathetic and efficient in their handling of a complaint and their contact with a complainant.</i></p> <p><i>The Stage 1 complaint handler <b>must</b>:</i></p> <ul style="list-style-type: none"> <li><i>• deal with complaints on their merits;</i></li> <li><i>• act independently and have an open mind;</i></li> <li><i>• take measures to address any actual or perceived conflict of interest;</i></li> <li><i>• consider all information and evidence carefully (including, for any recurring problems, any older reports as part of the background to the complaint if this will help to resolve the issue for the complainant); and</i></li> <li><i>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</i></li> </ul>
Best practice requirements			
3.3	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Complaints handlers are, for most services, directly within the relevant service to ensure appropriate and easy access to staff at all levels to ensure quick resolution, ensure the specialist knowledge, authority, and autonomy to resolve disputes quickly and fairly, and ensure access to managers and knowledge of the services to ensure robust identification of learning and delivery of associated actions. Complaints handlers are provided with regular training and briefings on effective complaints handling, and a range of guidance is available to assist them.

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
<b>Section 4 - Complaint handling principles</b>			
Mandatory requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>There is no 'pre-complaint' stage or 'stage 0' in operation. Whilst we will try to resolve matters informally wherever possible, our policy and procedure state that where a resident wishes to make a complaint, it must not be obstructed.</p> <p>Complaints and Compliments Policy:  <b>5.4 Managing complaints</b>  <i>5.4.1 We aim to resolve expressions of dissatisfaction as soon as possible, informally, at the "first point of contact". This may take the form of an apology, explanation of what has happened, or agreeing actions to be taken to resolve the situation. If further enquires are needed to resolve the matter, or if a customer tells us they wish to make a formal complaint we will move to Stage 1 of our two-stage process.</i></p> <p><b>5.4.2 Stage 1 complaints</b>  <i>5.4.2.1 On receiving a complaint, we expect our staff to listen and take the matter seriously. <b>Within five working days</b> of a complaint being made, we will acknowledge the complaint and provide the complainant with the investigating officer's contact details.</i></p> <p>Complaint Handling Procedure:  <b>1. Pre-process - early resolution of concerns</b>  <i>1.i. Wherever possible, we aim to resolve matters informally. If a resident raises a concern with the Customer Contact team or another officer, with the resident's agreement they may take immediate steps to try to resolve the concern. This may take the form of an apology, explanation of what has happened, or agreeing actions to be taken to resolve the situation.</i>   <i>1.ii. Any steps taken <b>must</b> be recorded clearly on QL. Actions taken <b>must not</b> obstruct access to the complaints process or result in any unreasonable delay. If further enquiries are needed to resolve the matter, or if the resident tells us they wish to make a complaint, we <b>must</b> move to the formal complaint process.</i></p> <p>NB. "Pre-process" above means "before the formal complaints process is initiated"; it does not refer to a formal process that precedes the complaint process, but rather reflects the first point of contact (e.g., telephone call) in which an issue is raised and the officer may take steps to immediately put things right, there and then. Residents may no longer wish to make a complaint if this happens, but if they do our formal process will be followed.</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 definition agreed between both parties.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><b>Within 5 working days of receipt of complaint</b>  <i>1.2 The Complaints and Information team will review the complaint and make a decision about whether it is accepted under the Complaints and Compliments Policy. If the complaint is found to not be suitable for the complaints process, the Complaints and Information team <b>must</b> write to the complainant to explain the reasons for this, which will be as described in the policy, and inform the complainant of their right to take the decision to an Ombudsman, as appropriate to the subject of the complaint.</i></p> <p><i>1.3 If the complaint is accepted under the policy, the Complaints and Information team <b>must</b> send an acknowledgement email or letter to the complainant. The acknowledgment <b>must</b> provide:</i>  <ul style="list-style-type: none"> <li>• a brief summary of the complaint;</li> <li>• advise who is investigating it and their contact details;</li> <li>• the complaint reference number; and</li> <li>• the date by which they can expect to receive a response (which will be within 10 working days of the complaint's acknowledgement).</li> </ul> <i>• (if the complaint is about landlord services) advice for the complainant about their right to access the Housing Ombudsman Service throughout their complaint, to afford the resident the opportunity to engage with the Ombudsman's dispute support advisors for impartial advice. The wording for this, for the Complaints and Information team's use, is included in Appendix 1 of this procedure.</i></p> <p><i>The Complaints and Information team <b>must</b> save the complaint acknowledgement on SharePoint.</i>  [...]</p> <p><b>Following acknowledgement of a Stage 1 complaint</b>  <i>1.7 Upon being assigned a complaint, the service area's Stage 1 complaints handler <b>must</b> either email or make telephone contact with the complainant to set out their understanding of the complaint and the outcomes the complainant is seeking. If any aspect of the complaint is unclear, the complainant <b>must</b> be asked for clarification and the full definition agreed.</i></p> <p><i>It is strongly recommended that Stage 1 complaint handlers, wherever possible and certainly where complaints are complex, make telephone contact with the complainant to discuss the complaint in more detail and confirm expected outcomes. Any verbal discussions must be confirmed in writing. Any emails or letters exchanged <b>must</b> be logged on QL and saved on SharePoint.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
4.6	A complaint investigation must be conducted in an impartial manner.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Training and briefings for complaints handlers reinforce this. Additional guidance is also available to assist complaint handlers that emphasises the need to be impartial.</p> <p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><b>Investigating a Stage 1 complaint</b>  1.10 The Stage 1 complaint handler's complaint investigation <b>must</b> be conducted in an impartial manner, seeking sufficient, reliable information from both the complainant and the business so that fair and appropriate findings and recommendations can be made. The Stage 1 complaint handler should ensure they are empathetic and efficient in their handling of a complaint and their contact with a complainant.</p> <p>The Stage 1 complaint handler <b>must</b>:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits;</li> <li>• act independently and have an open mind;</li> <li>• take measures to address any actual or perceived conflict of interest;</li> <li>• consider all information and evidence carefully (including, for any recurring problems, any older reports as part of the background to the complaint if this will help to resolve the issue for the complainant); and</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><b>Investigating a Stage 1 complaint</b>  1.10 The Stage 1 complaint handler's complaint investigation <b>must</b> be conducted in an impartial manner, seeking sufficient, reliable information from both the complainant and the business so that fair and appropriate findings and recommendations can be made. The Stage 1 complaint handler should ensure they are empathetic and efficient in their handling of a complaint and their contact with a complainant.</p> <p>The Stage 1 complaint handler <b>must</b>:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits;</li> <li>• act independently and have an open mind;</li> <li>• take measures to address any actual or perceived conflict of interest;</li> <li>• consider all information and evidence carefully (including, for any recurring problems, any older reports as part of the background to the complaint if this will help to resolve the issue for the complainant); and</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Barnet Homes has a separate policy on Reasonable Adjustments to Services that sets out the approach to handling reasonable adjustments on the basis of disability.</p> <p>This is also referred to in the Complaints and Compliments Policy:</p> <p><b>6 EQUALITIES</b>  [...]  6.2 We will act sensitively towards the diverse needs of individuals and communities, and may provide communications in alternative formats where practicable and appropriate to assist customers with distinct communication needs. Exceptions may be made to this policy in order to accommodate an individual's needs, and The Barnet Group will consider requests for reasonable adjustments in line with the Equality Act 2010.</p> <p>The Complaint Handling Procedure refers to this more broadly regarding all complaints:</p> <p>1.12 The Stage 1 complaint handler <b>must</b> adhere to any reasonable arrangements agreed with the complainant in terms of frequency and method of communication.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	<div> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Partially </div>	<p>We are partially compliant with this requirement.</p> <p>We are fully compliant with the requirement to give all parties a fair chance to set out their position. Complaints and Compliments Policy:</p> <p><b>5.4.2 Stage 1 complaints</b>  5.4.2.1 On receiving a complaint, we expect our staff to listen and take the matter seriously.  [...]</p> <p><b>5.4.2 Requests to escalate complaints to Stage 2</b>  5.4.3.2 The Barnet Group will not unreasonably deny a request for a complaint to be reviewed at Stage 2. The Complaints and Information team will consider all requests for escalation on their individual merits, and will take into account the customer's perspective and the steps that have been taken.</p> <p>Complaint Handling Procedure:</p> <p>1.7 Upon being assigned a complaint, the service area's Stage 1 complaints handler <b>must</b> either email or make telephone contact with the complainant to set out their understanding of the complaint and the outcomes the complainant is seeking. If any aspect of the complaint is unclear, the complainant <b>must</b> be asked for clarification and the full definition agreed.  It is strongly recommended that Stage 1 complaint handlers, wherever possible and certainly where complaints are complex, make telephone contact with the complainant to discuss the complaint in more detail and confirm expected outcomes. Any verbal discussions must be confirmed in writing. Any emails or letters exchanged must be logged on QL and saved on SharePoint.  [...]</p> <p>1.10 The Stage 1 complaint handler's complaint investigation <b>must</b> be conducted in an impartial manner, seeking sufficient, reliable information from both the complainant and the business so that fair and appropriate findings and recommendations can be made. The Stage 1 complaint handler should ensure they are empathetic and efficient in their handling of a complaint and their contact with a complainant.</p> <p>2.7 Upon being assigned a Stage 2 complaint, it is strongly recommended that the Stage 2 complaint handler makes contact with the complainant to discuss the complaint in more detail and confirm expected outcomes. The Stage 2 complaint handler should endeavour to manage the complainant's expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic. Any verbal discussions must be confirmed in writing. Any emails or letters exchanged must be logged on QL and saved on SharePoint.</p> <p>Regarding being able to comment on any adverse findings before a final decision is made, we are not fully compliant with this requirement. Barnet Homes' complaints policy is a policy for The Barnet Group that covers complaints related to a range of services and sectors, and it is not consistently appropriate or potentially possible to undertake this for every type of complainant. We do not believe it is reasonable to maintain separate policies for this purpose, and we have chosen to adopt an alternative approach to meet the needs of all The Barnet Group's customers to ensure a fair outcome is delivered for all complainants.</p> <p>We believe that providing an opportunity for complainants to review the draft response and comment on any adverse findings before a final decision is made will effectively add an additional stage to our complaints process. We do not believe a preliminary decision is necessary, as the complainant has opportunity to request escalation if they are not satisfied with the response at either stage. We believe this is proportionate, fair, and reasonable. We seek residents' feedback when we update our Complaints and Compliments Policy, and we have explained our reasoning to residents as part of this consultation, and have not received any adverse feedback.</p> <p>We do, however, encourage complaint handlers to, wherever possible, telephone the complainant after their investigation but before they have issued the response to give them opportunity to comment and to discuss how it will be put right. We would expect a large number of complaints we receive to include this step, and we believe this represents compliance with the Code.</p> <p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p>1.17 Before sending their response, the Stage 1 complaint handler should telephone the complainant explain their findings and give the complainant opportunity to comment and discuss how it will be put right. [note: it is strongly recommended that complaint handlers undertake this step for every complaint if possible. Benefits of making contact before sending the response include having the opportunity to address anything that has been missed and being able to explain more clearly the findings and the outcomes.]</p>



Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  5.4.3.1 If all or part of the complaint has not been resolved to the complainant's satisfaction, the complainant may request further investigation by a different officer who will usually be more senior.</p> <p>5.4.3.2 The Barnet Group will not unreasonably deny a request for a complaint to be reviewed at Stage 2. The Complaints and Information team will consider all requests for escalation on their individual merits, and will take into account the customer's perspective and the steps that have been taken. The team will determine if the complaint is eligible to be escalated, and will explain the decision fully in writing within five working days of the request being received.</p> <p>5.4.3.3 The Barnet Group will not escalate a complaint to Stage 2 for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• [...];</li> <li>• six months or more have passed since the Stage 1 response was provided (unless exceptional circumstances apply);</li> </ul>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>It should be noted that whilst many of the reasons for declining to escalate a complaint to Stage 2 that are set out in our policy are the same as those for not accepting a complaint, we believe there are <b>additional</b> reasons for declining escalation that are fair and reasonable, including:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  [...]  5.4.3.3 The Barnet Group will not escalate a complaint to Stage 2 for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• [...]</li> <li>• the complainant will not provide specific reasons for requesting a review (as we need to understand this so we can look into it);</li> <li>• the complainant has refused to engage with staff in trying to resolve the complaint at an earlier stage (unless exceptional circumstances apply);</li> <li>• the complainant is raising only new issues (instead, these will be dealt with as a new complaint at Stage 1)</li> </ul> <p>We will only refuse a request for escalation to Stage 2 in exceptional circumstances as set out in the policy. We believe these to be fair and reasonable because to provide an effective response the complaint handler needs to understand the issues being complained about and what the complainant remains dissatisfied with, if complainants are not cooperative to our efforts to engage with them to resolve an issue we will be limited in our ability to do so, and all issues should be considered first at Stage 1 of our process.</p> <p>Refusal to engage could include, by way of example, refusal to cooperate by allowing property access for actions to put the issue right at Stage 1, or refusal to provide evidence to support the claims being made in a complaint. We will use our discretion regarding refusal to engage or lack of engagement, particularly where, for example, hospitalisation or other issues have restricted the resident's ability to engage. We will consider whether all options for gaining access and/or working with the resident have been explored and exhausted, that the actions identified were reasonable, and will take into account whether relationship or trust issues could have impacted upon engagement.</p> <p>Our Complaints and Information Team takes the decision to escalate or refuse a request to escalate a complaint to Stage 2; the team is independent to the investigation of the Stage 1 complaint, and we believe this control helps to ensure impartiality in the decision.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>This is required within the Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.1 The complaint must be logged on QL at the first point of contact by the officer who receives it, and it must be assigned to the Complaints and Information team (within one working day wherever possible). If the officer is unable to access QL, as an exception only they must email full details to the Complaints and Information Team to log.</i></p> <p><i>[...]</i></p> <p><i>1.2 The Complaints and Information team will review the complaint and make a decision about whether it is accepted under the Complaints and Compliments Policy. If the complaint is found to not be suitable for the complaints process, the Complaints and Information team <b>must</b> write to the complainant to explain the reasons for this, which will be as described in the policy, and inform the complainant of their right to take the decision to an Ombudsman, as appropriate to the subject of the complaint. The Complaints and Compliments team <b>must</b> save any refusal to consider a complaint under the policy on SharePoint.</i></p> <p><i>1.3 If the complaint is accepted under the policy, the Complaints and Information team <b>must</b> send an acknowledgement email or letter to the complainant. [...] The Complaints and Information team <b>must</b> save the complaint acknowledgement on SharePoint.</i></p> <p><i>[...]</i></p> <p><i>1.7 Upon being assigned a complaint, the service area's Stage 1 complaints handler <b>must</b> either email or make telephone contact with the complainant to set out their understanding [...] Any verbal discussions must be confirmed in writing. Any emails or letters exchanged <b>must</b> be logged on QL and saved on SharePoint.</i></p> <p><i>[...]</i></p> <p><i>1.16 If it will not be possible to provide a response within the standard 10 working days – exceptional circumstances only</i></p> <p><i>1.16.7 The Stage 1 complaint handler <b>must</b> save a copy of any written communication regarding the complaint on SharePoint and log it on QL.</i></p> <p><i>[...]</i></p> <p><i>1.21 A full record <b>must</b> be kept of the complaint, any review, and the outcomes at each stage. This <b>must</b> include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any reports or surveys prepared. All relevant documents and emails, including the final complaint responses, <b>must</b> be saved on SharePoint by the complaint handler.</i></p>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	A Managing Unacceptable and Unreasonable Customer Behaviour Policy and Procedure is in place: <a href="#">Managing Unacceptable and Unreasonable Customer Behaviour Policy – Barnet Homes (thebarnetgroup.org)</a>
Best practice requirements			
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>This is reinforced in training and in guidance that is available to complaint handlers.</p> <p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.8 The Stage 1 complaint handler should endeavour to manage the complainant's expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.</i></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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>This is reinforced in training and in guidance that is available to complaint handlers.</p> <p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.11 The complaint should be resolved at the earliest possible opportunity, with the Stage 1 complaint handler having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the complainant, and whether there are any urgent actions required.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>2. SCOPE</b>  [...]  2.3 <i>The Barnet Group welcomes complaints and compliments from all residents, service users, and clients, advocates on their behalf, and non-customers who are affected by its services (all referred to as “customers” or “complainants” throughout this policy). This includes:</i>  • [...] • <i>other third parties and advocates acting with permission on behalf of a customer (excluding legal representatives who write to us with a view to take legal action).</i></p> <p>[...]</p> <p><b>5.2 Making a complaint</b>  5.2.2 <i>If something goes wrong, we want to make it easy for customers to make a complaint. Complaints or expressions of dissatisfaction can be received in several ways:</i>  • [...] • <i>by asking someone to tell us for you (with permission, including a family member, friend, advocate, or support worker).</i></p> <p>[...]</p> <p><b>5.3 Complaints through third parties</b>  5.3.1 <i>We recognise that some people who wish to complain may need support to do so. We accept complaints made by third parties (including family members, friends, advocates, or support workers) on behalf of a complainant, and will take steps in line with our Data Protection Policy to make sure that the complainant is in agreement, which may include seeking written permission where this is necessary. We will also give customers the opportunity to be accompanied by a third party or representative at a meeting with us about a complaint where this is reasonable.</i></p> <p>5.3.2 <i>Councillors and Members of Parliament (MPs) may also bring a formal complaint by acting as their constituent’s advocate; formal complaints will be handled in line with this Complaints and Compliments Policy, and not as an enquiry under our Members’ Enquiry Procedure.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.14 Where a key issue of a complaint relates to the parties’ legal obligations the Stage 1 complaint handler should clearly set out their understanding of the obligations of both parties and seek clarification before doing so where this is not initially clear.</i></p>
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.15 Unless a complaint is specifically about an individual member of staff, communication with the complainant (including the final written response) should not generally identify individual members of staff or contractors as their actions are undertaken on behalf of the organisation.</i></p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.16.6 The Stage 1 complaint handler should keep the complainant regularly updated about the progress of the investigation where possible, even where there is no new substantive information to provide.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Satisfaction surveys are completed by telephone one month after a complaint has been closed, and the outcomes of these are reported each quarter to the senior management team and the Resident Board scrutiny group, and to the Board annually.</p> <p>Complaints and Compliments Policy:</p> <p><b>5.6 Learning from complaints</b>  [...]  5.6.2 <i>We may seek feedback from customers who have made complaints so that we can use this to help improve our complaints handling and our complaints process.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><b>4. Learning lessons</b>  <b>Complaints handlers</b>  <i>4.1 It does not make sense to respond to complaints but fail to learn from them and keep making the same mistakes repeatedly. Instead of seeing complaints as a nuisance and a burden on your time, view them as an opportunity to improve the service we offer our customers. If you identify failings, you can put them right. This will lead to happier customers, a better reputation, and more time for you to do other things, and it will have a financial benefit to us.</i></p> <p><i>4.2 Complaints give us a valuable opportunity to identify where we may be doing something wrong, and to rectify this. Complaints may also indicate a wider issue that we should put right to improve our services, act appropriately, and/or improve the experience of our customers. Even complaints that seem like one-off mistakes by individuals may show a bigger problem that needs to be addressed.</i></p> <p><i>4.3 Our complaints handlers are the first people who are likely to notice trends in complaints – lessons must always be recorded on QL for complaints, and brought to the attention of the service manager.</i></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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Managing Unacceptable and Unreasonable Customer Behaviour Policy:</p> <p><i>5.6.15 The Barnet Group will take into account the customer's circumstances and where possible seek to provide an effective means of managing the relationship. Consideration will be given to the Equality Act 2010 and The Barnet Group will show due regard for an individual's medical condition and vulnerability such as mental health issues and learning disabilities. Accordingly, any restrictions imposed on a customer's contact should recognise and be appropriate to their individual circumstances. For example, where the customer has mental health problems The Barnet Group will attempt to engage with a family member, carer, or external agency such as the Community Mental Health Team.</i></p>
<b>Section 5 - Complaint stages</b>			
Mandatory requirements			
Stage 1			
5.1	Landlords must respond to the complaint within 10 working days 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.2 Stage 1 complaints</b>  <i>5.4.2.2 We aim to resolve a complaint at the earliest possible opportunity and to fully respond to each complaint within ten working days of it being acknowledged as accepted under our complaints process.</i></p> <p><i>5.4.2.3 If we need more time to investigate, we will let the complainant know why and how long it will take, up to a maximum period of 20 working days from the date the complaint was acknowledged. If an extension beyond 20 working days is needed to respond, we will advise why and how long it will take, and in some circumstances we will seek to agree this with the complainant.</i></p> <p>The Complaint Handling Procedure includes guidance on extending complaints investigations, and is clear that this is for exceptional circumstances only. It includes:</p> <p><i>1.16 If it will not be possible to provide a response within the standard 10 working days – exceptional circumstances only</i></p> <p><i>1.16.1 If it will not be possible to provide a response within the standard 10 working days due to the complexity of the issue or for another reason, the Stage 1 complaint handler must write to the complainant to give the clear timeframe for when the response will be received and an explanation of the delay. The extension should not exceed an additional 10 working days without good reason (20 working days in total from the formal acknowledgement of the complaint). It is strongly recommended that this is communicated to the complaint within 5 working days of the complaint being assigned.</i></p> <p><i>The reason for extending a complaint <b>must</b> be reasonable, and extensions cannot be agreed simply because the complaint investigation has not been prioritised.</i></p> <p>We acknowledge that we may occasionally experience a difference between policy and practice in the performance we achieve in answering complaints within this timescale. We will always prioritise completing a robust and thorough investigation into complaints to ensure the best outcomes for residents and a fair review, and in some instances this may lead to short delays if it has not been possible to anticipate that an extension is needed. Unexpected staff absence can also impact upon performance. We encourage our complaint handlers to be proactive in extending timescales wherever possible, and we monitor and report on "performance in time" with a view to ensuring the significant majority of complaints are dealt with according to our policy timescales, whilst maintaining an organisational ambition for the deadlines to be met every time. We also undertake quality assurance checks on a sample of complaints to identify potential issues and actions to improve performance.</p>



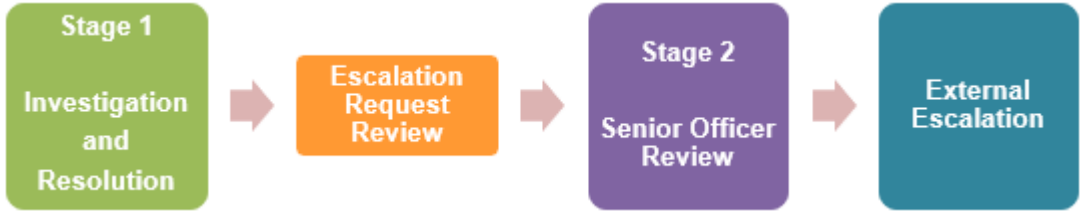
Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><i>1.16 Following their investigation, the Stage 1 complaint handler will make a decision on whether the complaint should be upheld, partially upheld, or not upheld. The complaint response <b>must</b> be sent to the complainant when the answer to the complaint is known, and <b>must not</b> be delayed by any outstanding actions that are required to address the issue; where necessary, these must be completed following the response and updates <b>must</b> be provided to the complainant.</i></p> <p><i>[...]</i></p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li><i>• [...]</i></li> <li><i>• details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> </ul> <p><i>[...]</i></p> <p><i>1.23 The Stage 1 complaint handler must quickly and efficiently track and action any outstanding actions / remedies, seeing them through to completion, and provide regular updates to the complainant.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li><i>• the complaint stage</i></li> <li><i>• the complaint definition</i></li> <li><i>• the decision on the complaint (including if it is upheld, partially upheld, or not upheld – addressing each key part of the complaint if multiple issues have been raised)</i> <ul style="list-style-type: none"> <li><i>o A complaint will be “not upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation acted correctly, or if a mistake was made but the service had already done what we would expect to put things right for those affected.</i></li> <li><i>o A complaint will be “partially upheld” if the investigation finds that the organisation got some things wrong, but not all the issues that were complained about.</i></li> <li><i>o A complaint will be “upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation made mistakes or provided a poor service that did not meet the standards a reasonable person could expect.</i></li> </ul> </li> <li><i>• the reasons for any decisions made (referencing the relevant policy, law, and/or good practice where appropriate)</i></li> <li><i>• the details of any remedy offered to put things right</i></li> <li><i>• details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> <li><i>• details of how to escalate the matter to Stage 2 if the resident is not satisfied with the answer (all complaint responses must include the standardised text for this (available on The Vine))</i></li> </ul>
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li><i>• the complaint stage</i></li> <li><i>• the complaint definition</i></li> <li><i>• the decision on the complaint (including if it is upheld, partially upheld, or not upheld – addressing each key part of the complaint if multiple issues have been raised)</i> <ul style="list-style-type: none"> <li><i>o A complaint will be “not upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation acted correctly, or if a mistake was made but the service had already done what we would expect to put things right for those affected.</i></li> <li><i>o A complaint will be “partially upheld” if the investigation finds that the organisation got some things wrong, but not all the issues that were complained about.</i></li> <li><i>o A complaint will be “upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation made mistakes or provided a poor service that did not meet the standards a reasonable person could expect.</i></li> </ul> </li> <li><i>• the reasons for any decisions made (referencing the relevant policy, law, and/or good practice where appropriate)</i></li> <li><i>• the details of any remedy offered to put things right</i></li> <li><i>• details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> <li><i>• details of how to escalate the matter to Stage 2 if the resident is not satisfied with the answer (all complaint responses must include the standardised text for this (available on The Vine))</i></li> </ul> <p>The Procedure also includes a recommended template for structuring complaint responses to ensure all of the above points are included.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
Stage 2			
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. 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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  5.4.3.1 If all or part of the complaint has not been resolved to the complainant's satisfaction, the complainant may request further investigation by a different officer who will usually be more senior.</p> <p>5.4.3.2 The Barnet Group will not unreasonably deny a request for a complaint to be reviewed at Stage 2. The Complaints and Information team will consider all requests for escalation on their individual merits, and will take into account the customer's perspective and the steps that have been taken. The team will determine if the complaint is eligible to be escalated, and will explain the decision fully in writing <b>within five working days</b> of the request being received.</p> <p>5.4.3.3 The Barnet Group will not escalate a complaint to Stage 2 for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• a response to the complaint has not yet been provided at Stage 1;</li> <li>• six months or more have passed since the Stage 1 response was provided (unless exceptional circumstances apply);</li> <li>• the complainant will not provide specific reasons for requesting a review (as we need to understand this so we can look into it);</li> <li>• the complainant has refused to engage with staff in trying to resolve the complaint at an earlier stage (unless exceptional circumstances apply);</li> <li>• the complainant is raising only new issues (instead, these will be dealt with as a new complaint at Stage 1);</li> <li>• it is a first request for service, information, or explanation of our policies and procedures;</li> <li>• it is a report of a neighbour dispute or anti-social behaviour, hate crime, or domestic violence;</li> <li>• it is a dispute about the amount of rent or service charge being charged;</li> <li>• it is a claim being dealt with by our insurers;</li> <li>• the action taken is set out by legislation or regulation;</li> <li>• the customer or The Barnet Group has commenced legal action;</li> <li>• it is an appeal against a policy decision or services where there is another appeals process, or there is a statutory appeal or tribunal process;</li> <li>• it concerns services for which The Barnet Group is not responsible; and/or</li> <li>• the matter has already been decided by a court or independent tribunal.</li> </ul> <p>[...]</p> <p><b>5.4.6 Following completion of The Barnet Group's process</b>  5.4.6.1 Following completion of The Barnet Group's complaints process at Stage 2, or if we refuse their request to escalate the complaint following Stage 1, if the complainant is not satisfied with our response they have the right to bring their complaint to the Housing Ombudsman Service or the Local Government and Social Care Ombudsman for independent review. The escalation route will be determined by the nature of the complaint; further information regarding this can be found at Appendix 1 - Complaint External Escalation Route.</p> <p>Complaint Handling Procedure:</p> <p><b>Within 5 working days of receipt of Stage 2 complaint</b>  2.3 The Complaints and Information team will make the final decision as to whether a complaint will be escalated to the next stage, and may consult with the relevant Service Manager or Head of Service to do so. The Complaints and Information team (or the Service Manager or Head of Service of the relevant service, if requested) <b>must</b> contact the complainant to ask for clarification if any aspect of the complaint is unclear, so the full definition of the complaint can be agreed with the complainant.</p> <p>If escalation is refused, the Complaints and Information team <b>must</b> write to the customer to advise of the reason(s) for this under our Complaints and Compliments Policy, and to advise the customer of their right to complain to the appropriate Ombudsman.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  [...]  5.4.3.2 The Barnet Group will not unreasonably deny a request for a complaint to be reviewed at Stage 2. The Complaints and Information team will consider all requests for escalation on their individual merits, and will take into account the customer's perspective and the steps that have been taken. The team will determine if the complaint is eligible to be escalated, and will explain the decision fully in writing <b>within five working days</b> of the request being received.</p> <p>Complaint Handling Procedure:</p> <p><b>Within 5 working days of receipt of Stage 2 complaint</b>  2.3 The Complaints and Information team will make the final decision as to whether a complaint will be escalated to the next stage, and may consult with the relevant Service Manager or Head of Service to do so. The Complaints and Information team (or the Service Manager or Head of Service of the relevant service, if requested) <b>must</b> contact the complainant to ask for clarification if any aspect of the complaint is unclear, so the full definition of the complaint can be agreed with the complainant. [...]</p> <p>2.4 If escalation of the complaint is agreed, the Complaints and Information team <b>must</b> send an acknowledgement letter or email to the complainant (blind copying the Stage 2 complaint handler if sent by email). The acknowledgement must provide:</p> <ul style="list-style-type: none"> <li>• a brief summary of the complaint;</li> <li>• advise who is investigating it and their contact details;</li> <li>• the complaint reference number;</li> <li>• the date by which they can expect to receive a response (which will be within 20 working days of the escalation acknowledgement).</li> </ul>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  5.4.3.1 If all or part of the complaint has not been resolved to the complainant's satisfaction, the complainant may request further investigation by a different officer who will usually be more senior.  [...]</p> <p>5.4.3.3 The Barnet Group will not escalate a complaint to Stage 2 for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• a response to the complaint has not yet been provided at Stage 1;</li> <li>• [...]</li> <li>• the complainant is raising only new issues (instead, these will be dealt with as a new complaint at Stage 1);</li> </ul>
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.3 Requests to escalate complaints to Stage 2</b>  5.4.3.1 If all or part of the complaint has not been resolved to the complainant's satisfaction, the complainant may request further investigation by a different officer who will usually be more senior.  [...]</p> <p><b>5.4.4 Stage 2 complaints</b>  5.4.4.1 An officer who has not previously been involved with the complaint investigation, and who usually is more senior, will carry out a review of the complaint and the Stage 1 response. We will review the previous investigations and actions to assess whether we have met our responsibilities, and identify any additional actions that may be required to resolve the complaint.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.4 Stage 2 complaints</b> [...]</p> <p><i>5.4.4.2 We aim to resolve a complaint at the earliest possible opportunity and to fully respond to a Stage 2 complaint <b>within 20 working days</b> of acknowledging that the complaint has been escalated.</i></p> <p><i>5.4.4.3 If we need more time to investigate, we will advise why and how long it will take, up to a maximum of 30 working days from acknowledgement of the complaint's escalation. If an extension beyond 30 working days is needed to respond, we will advise why and how long it will take, and in some circumstances we will seek to agree this with the complainant.</i></p> <p>The Complaint Handling Procedure includes guidance on extending complaints investigations, and is clear that this is for exceptional circumstances only. It includes:</p> <p><b>2.14 If it will not be possible to provide a response within the standard 20 working days – exceptional circumstances only</b>  <i>2.14.1 If it will not be possible to provide a response within the standard 20 working days due to the complexity of the issue or for another reason, the Stage 2 complaint handler must write to the complainant to give the clear timeframe for when the response will be received and an explanation of the delay. The extension should not exceed an additional 10 working days without good reason (30 working days in total from the formal acknowledgement of the complaint). It is strongly recommended that this is communicated to the complaint within 5 working days of the complaint being assigned.</i></p> <p><i>The reason for extending a complaint must be reasonable, and extensions cannot be agreed simply because the complaint investigation has not been prioritised.</i></p> <p>It is important to note that our approach mirrors the Housing Ombudsman's Code for Stage 1 complaints, in that we commit to logging a Stage 2 complaint within five working days of it being received and our 20 working days response time is from the formal acknowledgement of the complaint, which may not necessarily be the same day the resident sends us the request. This allows for the request to be reviewed and, where needed, for further information to be gathered to allow a decision about escalation.</p> <p>We acknowledge that we may occasionally experience a difference between policy and practice in the performance we achieve in answering complaints within this timescale. We will always prioritise completing a robust and thorough investigation into complaints to ensure the best outcomes for residents and a fair review, and in some instances this may lead to short delays if it has not been possible to anticipate that an extension is needed. Unexpected staff absence can also impact upon performance. We encourage our complaint handlers to be proactive in extending timescales wherever possible, and we monitor and report on "performance in time" with a view to ensuring the significant majority of complaints are dealt with according to our policy timescales, whilst maintaining an organisational ambition for the deadlines to be met every time. We also undertake quality assurance checks on a sample of complaints to identify potential issues and actions to improve performance.</p>
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> and <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><b>2.17 The written response <i>must</i> address all points raised in the complaint, and confirm the following in <b>clear, plain language</b> (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</b></p> <ul style="list-style-type: none"> <li>• <i>the complaint stage;</i></li> <li>• <i>the complaint definition;</i></li> <li>• <i>the decision on the complaint (including if it is upheld, partially upheld, or not upheld – addressing each key part of the complaint if multiple issues have been raised);</i></li> <li>• <i>the reasons for any decisions made (referencing the relevant policy, law, and/or good practice where appropriate);</i></li> <li>• <i>the details of any remedy offered to put things right;</i></li> <li>• <i>details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate); and</i></li> <li>• <i>details of how to escalate the matter to the appropriate Ombudsman if the resident is not satisfied with the answer (all complaint responses must include the standardised text for this (available on The Vine)).</i></li> </ul> <p>The Procedure also includes a recommended template for structuring complaint responses to ensure all of the above points are included.</p>



Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
Stage 3			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Barnet Homes has a two-stage complaint process (image overview from the Complaints and Compliments Policy and the website):</p> <p><b>5.4 Managing complaints</b></p>  <pre> graph LR     S1[Stage 1 Investigation and Resolution] --&gt; ER[Escalation Request Review]     ER --&gt; S2[Stage 2 Senior Officer Review]     S2 --&gt; EE[External Escalation] </pre> <p><i>5.4.1 We aim to resolve expressions of dissatisfaction as soon as possible, informally, at the “first point of contact”. This may take the form of an apology, explanation of what has happened, or agreeing actions to be taken to resolve the situation. If further enquires are needed to resolve the matter, or if a customer tells us they wish to make a formal complaint we will move to Stage 1 of our two-stage process.</i></p>
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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	<input checked="" type="checkbox"/> n/a	n/a
Best practice requirements			
Stage 1			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.2 Stage 1 complaints</b></p> <p><i>5.4.2.3 If we need more time to investigate, we will let the complainant know why and how long it will take, up to a maximum period of 20 working days from the date the complaint was acknowledged. If an extension beyond 20 working days is needed to respond, we will advise why and how long it will take, and in some circumstances we will seek to agree this with the complainant.</i></p> <p>Complaint Handling Procedure:</p> <p><b>1.16 If it will not be possible to provide a response within the standard 10 working days – exceptional circumstances only</b> [...]</p> <p><i>1.16.2 If more than 20 working days from the acknowledgement is needed to enable the Stage 1 complaint handler to respond to the complaint fully:</i></p> <p><b>For complaints about landlord services:</b></p> <p><i>1.16.3 The Stage 1 complaint handler must <b>agree</b> a longer extension with the complainant.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><b>1.16 If it will not be possible to provide a response within the standard 10 working days – exceptional circumstances only</b> [...]</p> <p><i>1.16.2 If more than 20 working days from the acknowledgement is needed to enable the Stage 1 complaint handler to respond to the complaint fully:</i></p> <p><b>For complaints about landlord services:</b></p> <p><i>1.16.3 The Stage 1 complaint handler must <b>agree</b> a longer extension with the complainant.</i></p> <p><i>If an agreement over the longer extension period cannot be reached, the Stage 1 complaint handler must provide the Housing Ombudsman’s contact details so the complainant can challenge the organisation’s plan for responding and/or the proposed timeliness of the response. Suggested text is included in Appendix 1 of this procedure.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (duplicated at Stage 2):</p> <p><b>Investigating a Stage 1 complaint</b>  <i>1.10 The Stage 1 complaint handler's complaint investigation must be conducted in an impartial manner, seeking sufficient, reliable information from both the complainant and the business so that fair and appropriate findings and recommendations can be made. The Stage 1 complaint handler should ensure they are empathetic and efficient in their handling of a complaint and their contact with a complainant.</i></p> <p><i>The Stage 1 complaint handler must:</i></p> <ul style="list-style-type: none"> <li>• [...]</li> <li>• consider all information and evidence carefully (including, for any recurring problems, any older reports as part of the background to the complaint if this will help to resolve the issue for the complainant);</li> </ul>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><i>5.4.2.4 If a complainant raises additional complaints during the investigation, wherever possible and at our discretion these will be incorporated into the Stage 1 response if they are relevant and if the Stage 1 response has not been issued. If the Stage 1 response has been issued or it would unreasonably delay the response, the issue will be logged as a new complaint.</i></p> <p>Complaint Handling Procedure:</p> <p><i>1.13 If the complainant raises additional complaints during the investigation, these should be incorporated into the Stage 1 response if they are relevant and the Stage 1 response has not yet been issued.</i></p> <p><i>If the Stage 1 response has been issued, or it would unreasonably delay the response, the Stage 1 complaint handler must log the issue on QL as a new complaint for the Complaints and Information team to acknowledge and assign to the appropriate team. If the Stage 1 complaint handler is unsure about whether an additional complaint should be incorporated or raised as a new complaint, they should discuss this with the Complaints and Information team.</i></p>
Stage 2			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaints and Compliments Policy:</p> <p><b>5.4.4 Stage 2 complaints</b>          [...]  <i>5.4.4.3 If we need more time to investigate, we will advise why and how long it will take, up to a maximum of 30 working days from acknowledgement of the complaint's escalation. If an extension beyond 30 working days is needed to respond, we will advise why and how long it will take, and in some circumstances we will seek to agree this with the complainant.</i></p> <p>Complaint Handling Procedure:</p> <p><b>2.14 If it will not be possible to provide a response within the standard 20 working days – exceptional circumstances only</b>          [...]  <i>2.14.2 If more than 30 working days from the acknowledgement is needed to enable the Stage 1 complaint handler to respond to the complaint fully:</i></p> <p><b>For complaints about landlord services:</b>  <i>2.14.3 The Stage 1 complaint handler must agree a longer extension with the complainant.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><i>2.14 If it will not be possible to provide a response within the standard 20 working days – exceptional circumstances only [...]</i></p> <p><i>2.14.2 If more than 30 working days from the acknowledgement is needed to enable the Stage 1 complaint handler to respond to the complaint fully:</i></p> <p><b>For complaints about landlord services:</b></p> <p><i>2.14.3 The Stage 1 complaint handler must agree a longer extension with the complainant.</i></p> <p><i>If an agreement over the longer extension period cannot be reached, the Stage 1 complaint handler must provide the Housing Ombudsman's contact details so the complainant can challenge the organisation's plan for responding and/or the proposed timeliness of the response. Suggested text is included in Appendix 1 of this procedure.</i></p>
Stage 3			
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	<input checked="" type="checkbox"/> 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.	<input checked="" type="checkbox"/> n/a	n/a
<b>Section 6 - Putting things right</b>			
Mandatory requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li>• [...]</li> <li>• <i>the decision on the complaint (including if it is upheld, partially upheld, or not upheld – addressing each key part of the complaint if multiple issues have been raised)</i> <ul style="list-style-type: none"> <li>o <i>A complaint will be “not upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation acted correctly, or if a mistake was made but the service had already done what we would expect to put things right for those affected.</i></li> <li>o <i>A complaint will be “partially upheld” if the investigation finds that the organisation got some things wrong, but not all the issues that were complained about.</i></li> <li>o <i>A complaint will be “upheld” if, regarding all the points raised in the complaint, the investigation finds that the organisation made mistakes or provided a poor service that did not meet the standards a reasonable person could expect.</i></li> </ul> </li> <li>• <i>the reasons for any decisions made (referencing the relevant policy, law, and/or good practice where appropriate)</i></li> <li>• <i>the details of any remedy offered to put things right</i></li> <li>• <i>details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> </ul>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.8 The Stage 1 complaint handler should endeavour to manage the complainant's expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.</i></p> <p><i>[...]</i></p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li><i>• [...]</i></li> <li><i>• the details of any remedy offered to put things right</i></li> <li><i>• details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> </ul> <p>Complaint Handling Procedure appendix ('Putting Things Right'):</p> <p><i>Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. The complaint handler must carefully manage the expectations of complainants and not promise anything that cannot be delivered or would cause unfairness to other residents.</i></p> <p><i>The complaint handler 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 / service users.</i></p> <p><i>In some cases, a complainant may have a legal entitlement to redress. The complaint handler should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.</i></p> <p><i>Please refer to the Compensation and Financial Loss Policy for more information and the principles that must be followed and the factors to consider – it refers to financial remedies as well as other types of remedy that may be appropriate.</i></p> <p>Compensation and Financial Loss Policy:</p> <p><i>3.1 This policy is intended to assist The Barnet Group to demonstrate care, commitment, and fairness, and to listen to and learn from its customers, enabling it to:</i></p> <ul style="list-style-type: none"> <li><i>• address any service failures;</i></li> <li><i>• identify areas for improvement or areas of good practice;</i></li> <li><i>• monitor services in a customer-focused way; and</i></li> <li><i>• address financial loss or award compensation when the organisation has been proven to be at fault.</i></li> </ul> <p><i>[...]</i></p> <p><i>3.5 Where a complaint or request for compensation is upheld, The Barnet Group will endeavour to provide redress in order to restore customers to the position they would have been in had the service failure not occurred. In the first instance this will include an apology and solutions to resolve the issue; however, where a customer's position cannot be restored by action alone, a financial compensation or financial loss award may be considered.</i></p> <p><i>[...]</i></p> <p><i>5.1.3 The Barnet Group will ensure that compensation is fair and proportionate. Each case will be considered consistently and on its individual merits, taking into account all relevant known circumstances and supporting evidence or documentation, whilst ensuring that discretion and common sense are applied. Where evidence is requested and is not supplied, claims may not be considered.</i></p> <p><i>[...]</i></p> <p><i>5.4.5.2 If a compensation payment is considered appropriate by The Barnet Group, the duration of the problem, the extent or severity of the service failure, and the vulnerability of the customer, including whether the impact is worsened through disability, old age, or the presence of young children, will be taken into consideration. Should this affect the value of compensation an officer feels appropriate, the decision may be escalated to a more senior member of staff.</i></p>



Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure (excerpt reflects Stage 1 process, and is duplicated for Stage 2):</p> <p><i>1.18 The written response must address all points raised in the complaint, and confirm the below in clear, plain language (it is recommended that complaint handlers use the suggested template in Appendix 2 to ensure all points are covered):</i></p> <ul style="list-style-type: none"> <li><i>• [...]</i></li> <li><i>• the details of any remedy offered to put things right</i></li> <li><i>• details of any outstanding actions (including what will happen and by when – in agreement with the resident where appropriate)</i></li> </ul> <p><i>[...]</i></p> <p><i>1.23 The Stage 1 complaint handler <b>must</b> quickly and efficiently track and action any outstanding actions / remedies, seeing them through to completion, and provide regular updates to the complainant.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>These points are fully covered in our Compensation and Financial Loss Policy.</p> <p>Complaint Handling Procedure appendix ('Putting Things Right'):</p> <p><i>Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. The complaint handler must carefully manage the expectations of complainants and not promise anything that cannot be delivered or would cause unfairness to other residents.</i></p> <p><i>The complaint handler 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 / service users.</i></p> <p><i>In some cases, a complainant may have a legal entitlement to redress. The complaint handler should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.</i></p> <p><i>Please refer to the Compensation and Financial Loss Policy for more information and the principles that must be followed and the factors to consider – it refers to financial remedies as well as other types of remedy that may be appropriate.</i></p>
Best practice requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure appendix ('Putting Things Right'):</p> <p><i>If something has gone wrong, the complaint handler (on behalf of Barnet Homes / Opendoor Homes) must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. This can include:</i></p> <ul style="list-style-type: none"> <li><i>• acknowledging where things have gone wrong</i></li> <li><i>• providing an explanation, assistance or reasons</i></li> <li><i>• apologising</i></li> <li><i>• taking action if there has been a delay</i></li> <li><i>• reconsidering or changing a decision</i></li> <li><i>• amending a record</i></li> <li><i>• providing a financial remedy</i></li> <li><i>• changing policies, procedures or practices.</i></li> </ul> <p><i>[...]</i></p> <p><i>The complaint handler 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 / service users.</i></p>
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure appendix ('Putting Things Right'):</p> <p><i>In some cases, a complainant may have a legal entitlement to redress. The complaint handler should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.</i></p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
<b>Section 7 - Continuous learning and improvement</b>			
Mandatory requirements			
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Lessons included in quarterly and annual reporting to the board. Lessons in the form of You Said...We Did are also published in the quarterly tenant newsletter, in a quarterly complaints performance update on the website, quarterly to the Resident Board scrutiny panel, and in the Annual Report for Residents.</p> <p>Complaint Handling Procedure:</p> <p><b>4. Learning lessons</b>  [...]  <b>Service managers and senior management</b>  [...]  4.8 Heads of Service for the services will review their lessons logs and assess the themes or trends on at least a quarterly basis to identify potentially systemic issues, serious risks, or policies and procedures that require revision, as well as to inform staff and contractor training. The Complaints and Information team will meet with Heads of Service every quarter to discuss this, and to agree the learning that will be included in the quarterly reports and published through You Said We Did in the resident newsletter and on our websites.</p> <p><b>5. Monitoring performance</b>  [...]  5.2 The Complaints and Information Team will review complaints handling performance on a monthly and quarterly basis. It will provide updates to Heads of Service including provision of an early warning where there are concerns about the impact of the monthly performance upon the quarterly or annual performance.</p> <p>5.3 Service managers will undertake monthly reviews of lessons learnt and trends with the support of the Complaints and Information team. Heads of Service will undertake at least quarterly reviews of lessons learnt and trends.</p> <p>5.4 Formal complaints performance reports will be provided to the Senior Management Team, the Board, and resident scrutiny groups (as agreed) on a quarterly and annual basis or as requested. Reporting is based on summarised performance, although individual anonymised case studies may be presented where necessary. Information presented to the Board each quarter will include complaints numbers, categories, outcomes, handling performance, and high-level lessons / improvement actions. Information presented to the Board annually (usually in September) will include complaints numbers, categories, outcomes, handling performance, high-level lessons / improvement actions, an overview of Ombudsmen performance and investigation outcomes, and an overview of the Ombudsmen's annual performance reports, where these have been published in a timely manner.</p>
Best practice requirements			
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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The board discussed this at its regular meeting of 23/06/22. The board agreed that championing complaints and supporting a positive Complaint Handling culture is a responsibility of all board members, and was satisfied that it already receives regular information on complaints and discusses this at its quarterly meetings. The board agreed that it would keep this position under review, and would appoint a lead member for complaints in the future if it felt it were appropriate or necessary.

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• 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.</li> <li>• The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Management responses to Housing Ombudsman enquiries or investigations are operationally tracked and managed by the Complaints and Information team to ensure a timely response within the required deadlines.</p> <p>Complaint Handling Procedure:</p> <p><b>5. Monitoring performance</b>  [...]  5.4 Formal complaints performance reports will be provided to the Senior Management Team, the Board, and resident scrutiny groups (as agreed) on a quarterly and annual basis or as requested. Reporting is based on summarised performance, although individual anonymised case studies may be presented where necessary. Information presented to the Board each quarter will include complaints numbers, categories, outcomes, handling performance, and high-level lessons / improvement actions. In the event of an Ombudsman finding of severe maladministration, a summary regarding this, including lessons learnt, will be reported to the next board meeting. Information presented to the Board annually (usually in September) will include complaints numbers, categories, outcomes, handling performance, high-level lessons / improvement actions, an overview of Ombudsmen performance and investigation outcomes, and an overview of the Ombudsmen's annual performance reports, where these have been published in a timely manner.</p> <p>5.5 The Complaints and Information team will complete an annual self-assessment against the requirements of the Housing Ombudsman's Complaint Handling Code on behalf of Barnet Homes and Opendoor Homes. A self-assessment will additionally be completed following any significant restructure and/or change in procedures. The outcome of the self-assessment will be reported to the boards every September. It will also be published on the Barnet Homes and Opendoor Homes websites, and included in the Annual Reports for Residents for Barnet Homes and for Opendoor Homes in a section on complaints handling performance. Members of Barnet Council's Housing and Growth Committee will also be made aware of Barnet Homes' self-assessment.</p>
7.5	<p>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.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><b>4. Learning lessons</b>  [...]  <b>Service managers and senior management</b>  4.6 Service managers are required to update their lessons log on an ongoing basis, using the lessons field on QL that has been completed by complaint handlers to identify trends and areas for improvement.</p> <p>4.7 The Complaints and Information team will meet with each service manager on a monthly basis to review and discuss the service lessons log, including reviewing the themes and capturing the progress being made in implementing the improvement actions.</p> <p>4.8 Heads of Service for the services will review their lessons logs and assess the themes or trends on at least a quarterly basis to identify potentially systemic issues, serious risks, or policies and procedures that require revision, as well as to inform staff and contractor training. The Complaints and Information team will meet with Heads of Service every quarter to discuss this, and to agree the learning that will be included in the quarterly reports and published through You Said We Did in the resident newsletter and on our websites.</p> <p>4.7 The Complaints and Information Team will complete quality assurance checks of 10% of complaints each month. The checks will identify for each complaint a good practice score (the standards that all complaints handling should meet - target of 100%), and a best practice score (where complaints handlers have provided exemplary service over and above the service standard requirements – maximum score of 100%), and feedback will be provided to the complaint handler's manager in order to support the delivery of improvements, including targeted training where appropriate. Wider learning about complaints handling from quality assurance checks will be shared with the business by the Complaints and Information Team.</p> <p>4.8 If a trend has been identified, managers may wish to call a focus group of customers to get more feedback to help identify how we can resolve the issues and avoid future complaints. The standard terms of reference for complaint focus groups should be used to manage this approach.</p>

Section	Code Requirement	Comply	Evidence, Commentary, and any Explanations
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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Barnet Homes does not currently set standard objectives for all staff; instead, objectives are set for individuals based on current needs. In 2023/24 we are to implement a new approach to monitoring and discussing ongoing staff goals, work in progress, and learning and development, and as part of this we intend to set a corporate objective for all staff as follows, which will make us partially compliant: “Demonstrate a collaborative and cooperative approach to resolving complaints or issues by working with colleagues across teams and departments, and rather than blaming others taking a collective responsibility for any shortfalls identified through complaints, feedback, or issues.”
<b>Section 8 - Self-assessment and compliance</b>			
Mandatory requirements			
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Self-assessment first completed and published in December 2020 and subsequently against the updated Code in September 2022. It is scheduled as an annual review for the board.</p> <p>Complaint Handling Procedure:</p> <p><b>5. Monitoring performance</b>  [...]  5.5 The Complaints and Information team will complete an annual self-assessment against the requirements of the Housing Ombudsman’s Complaint Handling Code on behalf of Barnet Homes and Opendoor Homes. A self-assessment will additionally be completed following any significant restructure and/or change in procedures.</p>
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Complaint Handling Procedure:</p> <p><b>5. Monitoring performance</b>  [...]  5.5 The Complaints and Information team will complete an annual self-assessment against the requirements of the Housing Ombudsman’s Complaint Handling Code on behalf of Barnet Homes and Opendoor Homes. A self-assessment will additionally be completed following any significant restructure and/or change in procedures.</p>
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Self-assessment to be reported annually to the board, and elected members to be made aware. To be published on the Barnet Homes website, and referred to in the Annual Report for Residents.</p> <p>Complaint Handling Procedure:</p> <p><b>5. Monitoring performance</b>  [...]  5.5 The Complaints and Information team will complete an annual self-assessment against the requirements of the Housing Ombudsman’s Complaint Handling Code on behalf of Barnet Homes and Opendoor Homes. A self-assessment will additionally be completed following any significant restructure and/or change in procedures. The outcome of the self-assessment will be reported to the boards every September. It will also be published on the Barnet Homes and Opendoor Homes websites, and included in the Annual Reports for Residents for Barnet Homes and for Opendoor Homes in a section on complaints handling performance. Members of Barnet Council’s Housing and Growth Committee will also be made aware of Barnet Homes’ self-assessment.</p>