Solihull
Community Housing
Shaping our neighbourhoods

Annual Complaints Performance & Service Improvement Report **April 2024**

Solihull
METROPOLITAN
BOROUGH COUNCIL

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1. Introduction

There are challenging times ahead for all social housing landlords with the introduction of new and exciting legislation and regulation. Part of the new regulations is the Housing Ombudsman Complaints Handling Code.

As the responsible people for social housing complaints for Solihull Metropolitan Borough Council (SMBC) and Solihull Community Housing (SCH), we are pleased to introduce the first Complaints Annual Report and Service Improvement Plan. We have worked directly with officers and tenants to understand our performance in managing complaints and we have carried out a Self-Assessment to understand the progress SCH have made against compliance with The Code, more details of this can be found in the report.

We are committed to ensuring a positive complaints culture exists throughout SCH, in which we listen to our customers and learn from their experiences. Learning from complaints and making service improvements as a result of them is one of the most important parts of the complaints handling process. This report contains examples of how SCH have learned from complaints. We will work with officers and customers over the coming year to continue to learn from complaints and make improvements to the way we deliver services.

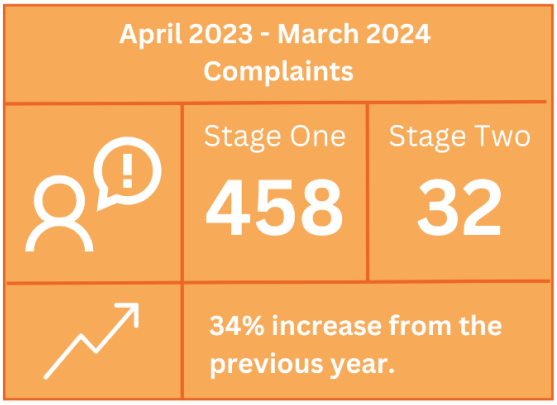
It is good to see that there has been an honest and open assessment of the complaints service provided by SCH against The Code which has resulted in agreed actions to improve our performance and ensure we remain compliant with The Code. Complaint volumes are increasing year on year throughout the sector, we anticipate this trend will continue as we encourage customers to tell us when they think we have done something wrong. We are committed to having meaningful oversight of complaints and we will be monitoring the service improvement plan over the coming months to ensure we make the improvements needed to deliver great services and put things right quickly if things don't quite go to plan.

On behalf of SMBC and The SCH Board

2. Complaint handling performance

2.1 Managing complaints

During the last 12 months (April-March) customers raised **458 stage 1 complaints, and 32 stage 2 complaints.** That was **34%** more than the previous year. This is seen by SCH and SMBC as a good thing. SCH have worked hard to promote the complaints service and invite complaints from customers where things have gone wrong. It means residents can access the complaints service more easily, feel more confident to make a complaint and we have great feedback to learn from and improve services as a result.

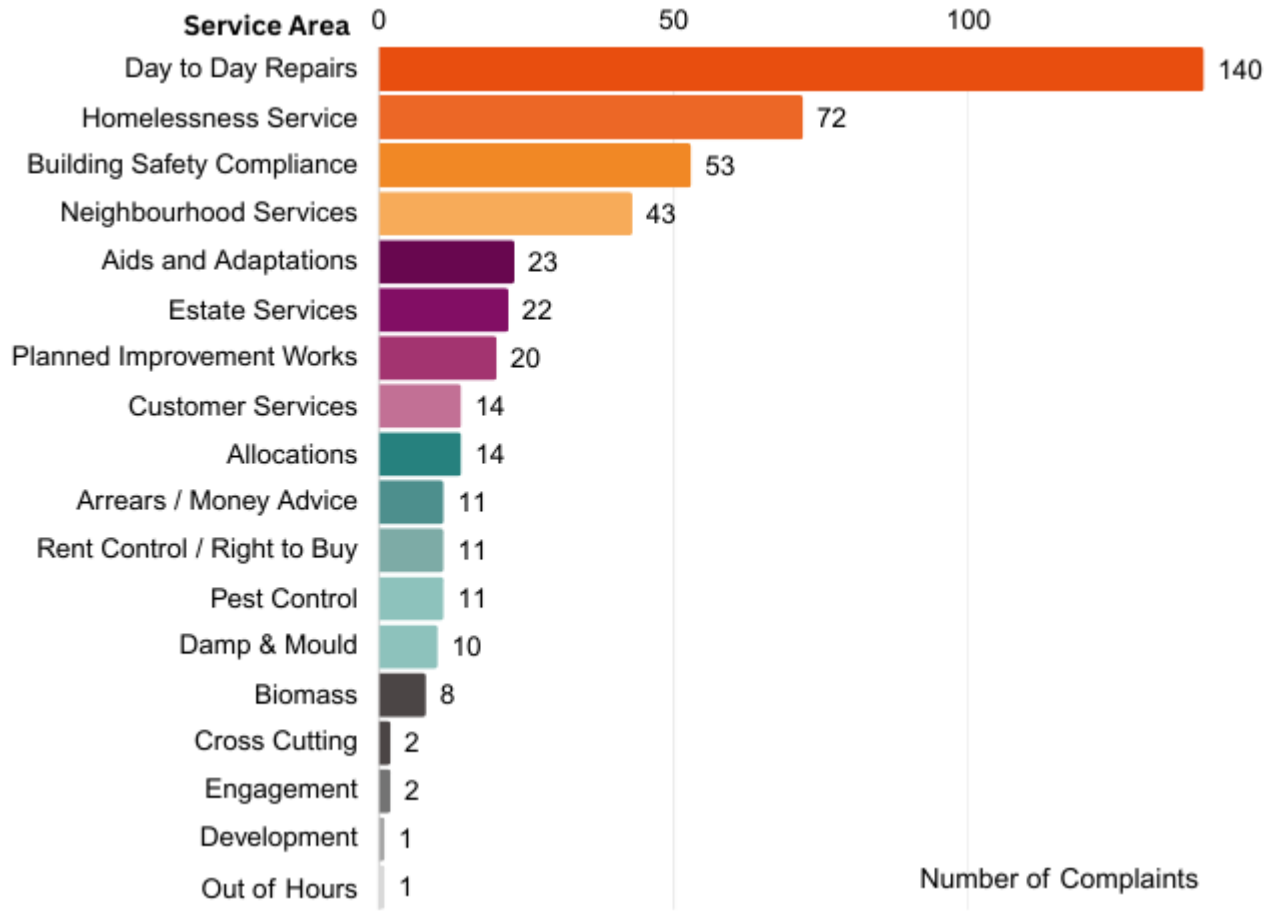


Of the 458 Stage 1 complaints, 56% were upheld. This means SCH recognise that customers have been impacted by our service delivery.

Table 1 shows SCH's performance against the Social Housing Regulator's key indicators; complaints completed in target and customer satisfaction. We also use benchmarking information provided by an organisation named Housemark, and we can use this to give an idea of how we are performing against other social housing providers. The table below summarises this position, where 1st quartile position is the top 25% of providers and 4th quartile is the bottom 25% of providers.

Table 1

Key performance indicator	Percentage	National average	Top quartile	Quartile position
Stage 1 complaints completed in target timescale	70.34%	85%	96.3%	3rd
Stage 2 complaints	95.00%	82.1%	100%	2nd
All complaints completed in target timescale	71.57%	-		-
Satisfaction with complaints handling	34.25%	34%	42%	2nd
Stage 1 complaints per 1,000 properties	38.72	No quartile data is available.		
Stage 2 complaints per 1,000 properties	2.03			


Service Area
0
50
100
Day to Day Repairs 140
Homelessness Service 72
Building Safety Compliance 53
Neighbourhood Services 43
Aids and Adaptations 23
Estate Services 22
Planned Improvement Works 20
Customer Services 14
Allocations 14
Arrears / Money Advice 11
Rent Control / Right to Buy 11
Pest Control 11
Damp & Mould 10
Biomass 8
Cross Cutting 2
Engagement 2
Development 1
Out of Hours 1
Number of Complaints

Number of yearly transactions (approx.)
31,341
Keep customers informed
Do what we say we are doing to do
Deal with a request first time
Over
2/3
of complaints were made by female customers
% of complaints from the Black, Asian and Minority Ethnic community (where ethnicity was known)
13%
% of community that is Black, Asian and Minority Ethnic in Solihull
18%

2.2 Customer satisfaction

We complete monthly satisfaction calls to residents who have closed a complaint with us, and during 2023/24 we completed 143 survey calls.

Results for 2023/24:

Question	2023/24
Ease of reporting	67.61%
How quickly SCH made contact	61.15%
Officer was helpful, knowledgeable and professional	59.57%
Kept informed on progress of complaint	45.45%
Satisfaction with response, explaining the results of our investigation	44.68%
Satisfaction with response, in terms of understanding the outcome	42.86%
Satisfaction with final outcome	38.76%
Satisfaction SCH were easy to deal with	45.39%
Overall satisfaction with complaint handling	45.77%

Customers told us that it was easy to make a complaint and staff were mostly helpful, knowledgeable and professional.

The top reason for dissatisfaction was communication during the complaint process. SCH have used this feedback to look at how best to manage complaints. We are trialling a centralised complaints team to ensure complaints are all handled in the same way, with better communication and with a clear process.

2.3 Refusals

There are occasions when we will refuse to accept and investigate complaints. Our policy clearly sets out the reasons we would do this. During 2023/24 we have refused complaints on the following basis:

	Where there was Legal Right to Review such as Housing Allocations under 166 & 167 of the Housing Act 1996 or review of a Section 184 decision under the Homeless Reduction Act. However, where the complaints made were about the way in which the application process was handled this was accepted as a complaint, it is only where the customer is challenging the decision that a complaint will be refused.
	The customer had exhausted our complaints process and was reporting the same issue within 6 months of that decision having been provided.
	The complaint was made by an out of Borough applicant who wanted to complain about the decision SCH made following their request to seek a mutual exchange with one of our tenants. The decision to refuse the complaint was because the mutual exchange decision followed legislative requirements and we were unable to provide information about why we refused the exchange without disclosing information about our tenants' personal circumstances, protected under the Data Protection Act.
	A customer wanted to complaint about the lack of advice given about the difference between right to buy scheme and right to acquire scheme operated by the Housing Association they were transferring to. On reviewing the information, the customer had moved to the Housing Association 13 years prior and therefore the complaint was refused.
	A complaint from a private landlord was declined on the basis that the customer would not engage with SCH. The landlord was looking to maximise their income and minimise arrears. Their tenant was not known to SCH or engaged with SCH since 2019 and we have no authority to apply for benefits in their right.
	Complaint declined on the basis that the customer had moved and was complaining about a previous tenancy, issues with repairs at that property had been considered under a Section 11 disrepair claim and an insurance claim.

All customers received a letter confirming their complaint would not be investigated and why as well as their right to seek advice from the relevant Ombudsman.

3. Service Improvements and Learning

Learning from complaints and making improvements as a result of them is one of the most important and valuable parts of the complaints process. Sometimes individual complaints lead to specific changes to policies or the way we work. On other occasions themes occur across several complaints and we then use to make changes and improvements.
Complaints offer a wealth of learning, the below isn't reflective of all the complaints received, instead it's an overview of the key learning. SCH are committed to improving how learning is

extracted from complaints, we are aiming to get a deeper understanding of the themes in complaints and the detail of where service delivery could be improved.

The table below provides an overview of some of the things SCH has learnt from complaints in 2023/24:

3.1 Individual learning

Individual learning from Stage 1 and 2 complaints		
What went wrong?	What did we learn?	What did we change?
We sent an arrears letter relating to service charges to a resident in temporary accommodation. They were unhappy because they felt we hadn't provided sufficient information on what service charges are covered by Universal Credit and what is the responsibility of the resident	The information we give at sign up was not clear	Improved the information at sign up that makes clear what is and is not covered by Universal Credit.
A customer who had suffered a leak from a flat above them was issued with de-humidifiers to help to dry out the property. The customer complained that this was having a financial impact on the household, especially during times of high utility costs.	That the use of dehumidifiers had a financial impact on residents, especially when they are used over an extended time	An improvement to the service to ensure where dehumidifiers are required, reimbursement of the cost of running dehumidifiers is automatically considered.
A customer of the Safe and Sound service had suffered a fall and had waited in excess of 3 hours for ambulance to arrive. Their advocate was concerned that the elderly vulnerable person was left alone to wait for the ambulance.	Although waiting times for ambulances are outside of the control of SCH, we would not want a vulnerable resident left alone for an extended period of time.	A new process has been put in place where if the wait for an ambulance is likely to take longer than 2 hours, Safe and Sound officers will attend and carry out a welfare check ensuring the customer is left comfortable (for example ensure the environment is suitable, open windows if too hot, and provide appropriate hydration.)
A customer who had moved into a property offered as a result of a homeless acceptance. The customer moved into the property but felt that the property was not suitable due to the location.	Conversations with the Housing Options Officer took place via text message, messages and these were misinterpreted and therefore no Review of suitability was carried out.	Introduced a new process to ensure that any approach by a customer for a review of any homeless decision, the customer will receive a formal letter confirming receipt of the request and what is required from them to progress the Review.
A customer complained about the Do It Yourself Shared Ownership Scheme process and information	The information available within the application pack didn't provide all the eligibility criteria for the scheme	The application pack was reviewed, and more detailed information about the eligibility criteria for the scheme was made clearer and became an important part of the application.
A customer complained following an overpayment of rent, for which we provided incorrect advice on next steps	The advice we provided could have led to financial detriment for the residents	Change of process to ensure additional checks are in place when overpayments are flagged on SCH systems.
A customer complained that repeat repairs to a boiler were not identified as linked	Our ability to highlight when a boiler may need a replacement is limited	A process has been created in the Contact Centre whereby multiple visits

		for the same issue trigger a notice to repairs
A customer complained their garage repair had taken too long	Garage repairs that require Asbestos works had an overly complex process	The process was amended to help reduce the wait time for customers
A customer complained that the follow on works after an inspection hadn't been completed or had taken too long to complete	Monitoring of follow on works could be enhanced	Diarising of works improved, reporting of follow on work improved.
A customer had to repeatedly report the same repair issue	Monitoring of follow on works and customer communication could be enhanced	Diarising of works improved, reporting of follow on work improved, record keeping being reviewed. A process has been created in the Contact Centre whereby multiple visits for the same issue trigger a notice to repairs.
A service user complained that SCH didn't support them when they needed to make a personal injury claim	When the case is complex it would be beneficial to have a better handover to SMBC	Service areas have agreed a new process for such circumstances.
A customer complained that the follow on works after a sprinkler activation were slow and unclear	Initial response to the incident was robust, however follow on actions could be improved	A new process has been put in place and the recovery phase of an incident now sits with the Customer Experience Team
Learning from HOS determinations* (see section 6)		
What went wrong?	What did we learn?	What did we change?
We prioritised the needs of the customer over the need to complete a gas service on time.	That we need to ensure gas services are undertaken in line with building safety legislation, considering not just the need of the customer, but all customers living nearby	New Gas Safety process established which ensures legal action is instigated earlier in the process.
Took too long to resolve issues with the roof and associated leaks	That the process in place for roof repairs could be improved	New roof works process created and improved monitoring of work in progress, monthly report regarding repeat contact to the Contact Centre created and utilised.
There were missed opportunities to resolve ongoing issues with leaks which had a significant impact on the customer and confusion with complaint handling	That repeat requests for repairs should be identified as an indicator of a service delivery issue, that identifying one point of contact for customers is important when handling complaints	An action plan has been put in place to address these issues

*The above cases from the Housing Ombudsman occurred in 2021 and 2022. SCH and SMBC extracted learning at the time and made changes to service delivery, however the additional insight from the Housing Ombudsman has also been utilised to review and enhance learning.

3.2 Themes

Consistency of investigation and effective communication
Complaints data is monitored by the Customer Feedback Team, and quality assurance undertaken on the quality of investigation and final responses. The Customer Feedback Team identified some specific service areas where improvements could be made so provided targeted support to those teams and complaint handling refresher training was delivered to support teams to make the required improvements.

As part of the improvements and based on feedback from complaints SCH are trialling the centralisation of the complaints function. This will ensure that the approach to investigating complaints and customer communication is consistent, meets the needs of customers and complies with the complaints policy.

Record keeping
Record keeping features in several complaints and HOS determinations. Improvements are required and are being addressed throughout all teams, for example via Toolbox Talks and team briefs. The investment in a new software will support progress significantly, especially though the workflow function.

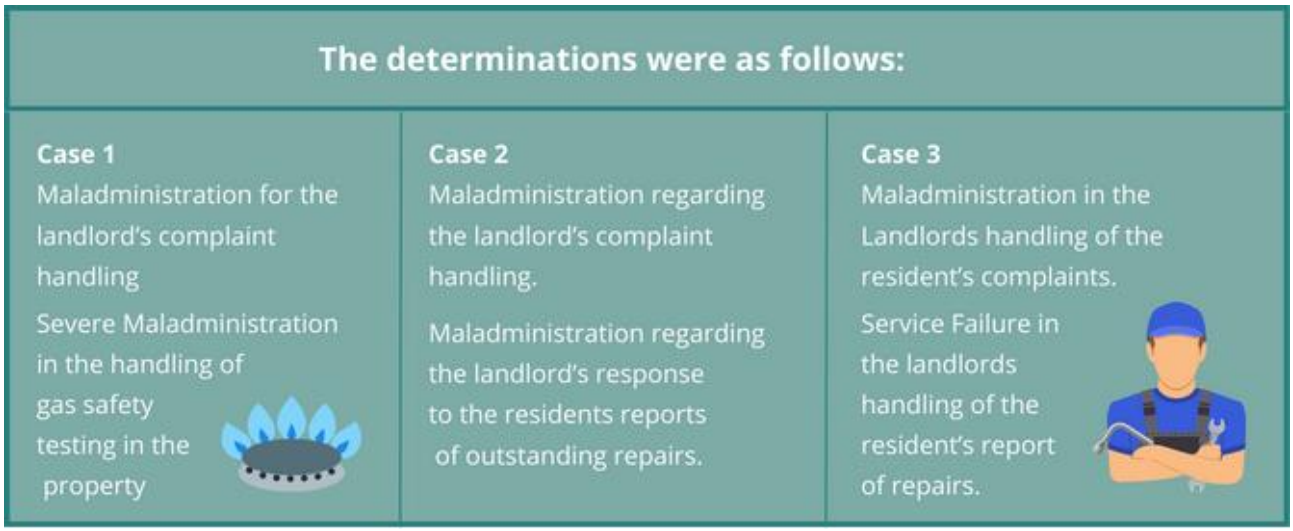
Tenants with additional needs
Health issues enhance the complexity of some complaint cases. in most cases we adapt to this well. However we are not always consistent in considering the individual needs of the tenant, and adapting processes where possible. The centralisation pilot will support this as the complaint handler is only focused on resolving complaints. A self-assessment against the recent HOS spotlight report is underway.

4. Housing Ombudsman

4.1 Determinations

SCH have received three full reports from the Ombudsman which include final determinations. A determination is where the Ombudsman has investigated a customers' complaint, reviewed what we did, has found that we got something wrong and tells us what we need to do to put it right.

One of the determinations featured in a HOS insight report which helps other housing providers learn from the findings.



In all cases we have set up a working group to look at the Housing Ombudsman's findings and how we might improve our services as a result of those findings. We have changed our processes and developed plans to improve our services. We have issued compensation and apologised to customers and in some cases offered mediation. We also enhanced training in particular areas.

4.2 Spotlight reports

The Housing Ombudsman issue reports that set out what they have learnt from complaints in particular areas and makes recommendations to housing providers. These are called Spotlight Reports. This year we have reviewed and carried out self-assessments against the following Spotlight Reports to identify learning that we can use to make improvements to service delivery and complaint handling:

- Knowledge and Information Management (KIM)
- Damp and mould
- Noise complaints

4.3 HOS Annual Reports

We have not received an annual report from HOS this year.

5. Self-Assessment

As part of its legal duty to monitor landlord compliance with The Complaint Handling Code, the Housing Ombudsman have instructed landlords to carry out a self-assessment against the code annually. The Self-Assessment is an opportunity for SCH and SMBC to reflect on the current approach, ensure we comply with The Code and take forward any opportunities to improve service delivery. SCH must submit the annual self-assessment and service improvement plan to the Housing Ombudsman and publish it on our website.

Appendix A in this report is the Self-Assessment SCH and SMBC have completed against the new Complaint Handling Code. In summary, the self-assessment is split into 9 sections and there are 73

points that SCH and SMBC must comply with. There are 7 points where SCH and SMBC need to make some improvements to be compliant. These are discussed in the next section.

Our Self-Assessment will be published on the SCH and SMBC website and available in other formats upon request.

6. Service Improvement Plan

SCH have developed a Service Improvement Plan (SIP) for complaints that encompasses the opportunities identified in the Self-Assessment (Appendix A of this report)

The Service Improvement Plan will be maintained and overseen by Head of Customer Experience, although all service areas within SCH will be involved in the delivery and success of the SIP.

The Housing Ombudsman require Landlords to create and publish the SIP as part of the oversight and scrutiny required by the Complaint Handling Code. This is included at Appendix A of this report.

The table shows seven points where SCH and SMBC need to make improvements to be fully compliant.

Section	Code/SA ref	Action Title	Action Detail	Improvement	Target Date
Actions to ensure full compliance					
5	5.12	Record Keeping	All correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys	Enhance complaints training, conduct complaint audits on 10% of complaints received, Continue to work on transformation project to create an effective complaints case management system	Q2
6	6.3	Stage 1 full response 10 days	Policy confirms 10 days, SCH aspire to 10 days, however, recognise that in performance year 2023/2024 we didn't achieve this 100% of the time.	Review the Complaints pilot to identify appropriate resource and conclude whether the centralisation of complaints therefore a dedicated approach is beneficial. support prioritisation of complaint handling, enhance complaint handling knowledge across the business	Q2
	6.6	Tracking outstanding actions	Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Focus on good communication with customers, and doing what we say we are going to do. Review approach to complaints handling as per the pilot, centralise oversight of follow on actions from complaints, explore the possibility of Complaints repairs codes to allow reporting and proactive management.	Q2

7	7.3	Remedy Tracking	Requirement to ensure all remedies are tracked and completed	10% of complaints have a Complaint Audit, centralised oversight of complaint outcomes to ensure completion	Q2
9	9.2	Positive Complaints culture	Positive complaints culture, leads to positive changes in service delivery	Review the impact of the Complaints Pilot, Continue to support the Transformation project which will deliver effective case management therefore improved extraction of learning. Development of Business Intelligence team to create data lead service improvement. Focus on system and process enhancements to allow identification of themes within complaints Shared understanding across SCH of the customer journey and the impact each Service area can have.	Q2
	9.3	Accountability & Transparency	Reporting back to wider groups – customers, panels, committees, staff	Transformation project enabling greater reporting Enhancement of Board champion for complaints – creating Member responsible for complaints with planned activities to ensure greater sharing of learning and service improvements. Review of complaints data and reporting provided to MRCs, Board and SMBC. To include a KPI to monitor HOS determination performance and benchmarking. Review of complaints by SCHape Scrutiny Panel	Q1 Q2
	9.8	Complaints Objective	Specific complaints objective and detail required	SCH have a complaint objective for staff, however based on this requirement it will be reviewed. Review underway by Organisational Learning and Development Manager Complaint requirements will feature in this review and appropriate objectives created	Q2

Further improvements will also be made in areas where we already comply to enhance the service provided.

There is lots of information relating to complaints on the SCH website.

This QR code will take you to the complaints hub.

This QR code will take you to make a complaint.

If you would like to contact the Housing Ombudsman, you can do so in a number of ways:

PO Box 1484
Unit D
Preston
PR2 0ET

Call us on 0300 111 3000

www.housing-ombudsman.org.uk/residents/make-a-complaint/

Are you interested in working with us to review, monitor and improve the way we deal with complaints?

We are looking for residents to get involved in a number of activities such as:

Complaints reviewers

Customer Experience forum

Complaints advocates

Virtual Improvement Panel

If you are interested in getting involved please contact the engagement team at engagement@solihullcommunityhousing.org.uk

This report has been approved by the resident Virtual Improvement Panel

Virtual Improvement Panel

If you would like this report in any other format or language please contact us here:
Or telephone us on
0121 717 1515

Appendix A: Self-assessment form

This self-assessment form should be completed by the Complaints Officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	Yes	Complaints Policy	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Internal communications to staff Complaints Training Contact Centre guides	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must	Yes	Complaints Policy Operational Performance Performance dashboard Data Strategy	

	be recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Independent company undertake customer satisfaction surveys, they advise how the customer can complain through scripts Any reports of dissatisfaction are shared with SCH and appropriate action taken through flag process	

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes	Complaints Policy	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	Complaints Policy	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept	Yes	Complaints Policy	Complaints process for staff Script review/change

	complaints made outside this time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy Managed by the centralised Customer Feedback Team	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy Reasonable-Adjustments-Policy-for-Customer-Complaints.pdf (solihullcommunityhousing.org.uk)	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Training Internal Communication to staff Internal complaints guidance for staff	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	SCH monitor and benchmark volume of complaints, however complaint volumes are not RAG rated.	

3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaints Policy Service-Standards-April-2024.pdf (solihullcommunityhousing.org.uk) Policy available in different languages on request Policy can be downloaded, posted	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints Policy	
3.6	Landlords must 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.	Yes	Complaints Policy Contact Centre Guides Online complaint submission form Complaint Handling Training	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy Complaint Handling Training Internal complaints guidance for staff	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Customer Feedback Team	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Customer Feedback Team Pilot centralisation of team	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaints Training Internal staff communication – Core Brief	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints Policy	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints Policy	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Internal complaints guidance for staff	

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	SCH staff investigate complaints about contractors or third parties in line with our complaints policy, process and procedures	Ensure this is included in the Communal areas contract
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Letter Templates Acknowledgement letters are sent from the centralised Customer Feedback Team to ensure consistency	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Letter Templates Acknowledgement letters are sent from the centralised Customer Feedback Team to ensure consistency	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Complaint Handling Training Internal Complaints guidance for staff Complaints Pilot	

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy Complaints Training Internal Complaints guidance for staff	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints Policy Reasonable-Adjustments-Policy-for-Customer-Complaints.pdf (solihullcommunityhousing.org.uk) Complaints Training Internal Complaints guidance for staff Acknowledgement Letter template Complaints case management system logs adjustments Our Inclusive Services Register is now live! - Solihull Community Housing	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaint are monitored centrally and decisions to refuse or accept a complaint made centrally, monitored and authorised by the Complaints Manager to ensure consistency and compliance with the code. See 2.4	

5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received all correspondence wit other parties and any relevant supporting documentation such as reports or surveys	No	Complaint Handling Training Centralised repository for documents Case Management notes	SCH endeavour to ensure all complaint correspondence is reflected in the complaints case management. However, we recognise that this hasn't been achieved consistently. The Service Improvement Plan identifies how record keeping will be enhanced.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints Policy Internal Complaints guidance for staff Complaint Handling Training	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	SCH-Unreasonable-Communication-Policy-2024.pdf (solihullcommunityhousing.org.uk)	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	SCH-Unreasonable-Communication-Policy-2024.pdf (solihullcommunityhousing.org.uk)	

	for the provisions of the Equality Act 2010.		A Fair Treatment Assessment has been completed for this policy which has been agreed and signed off independently by SMBC equalities team	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy Internal Complaints guidance for staff Complaint Handling Training	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	Complaints Policy	
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	No	Complaints Policy	The SCH policy and processes are committed to a 10 day turn around for complaints, however this hasn't been achieved 100% of the time. Therefore this element is highlighted in the Service Improvement Plan

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy Internal Complaints guidance for staff Complaint Handling Training	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy Internal Complaints guidance for staff Complaint Handling Training	
6.6	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	No	Complaints Policy Internal complaints guidance for staff Complaints Handling Training	SCH have processes in place to ensure an answer is given to a resident when it is known. However actions are not tracked centrally to allow appropriate oversight and updates once a complaint is closed. The Service Improvement Plan seeks to address this.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Internal Complaints guidance for staff Complaint Handling Training Letter Templates	

6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Internal Complaints guidance for staff Complaint Handling Training	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Internal complaints guidance for staff Letter Templates	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy Internal complaint guidance for staff	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Complaints Policy Internal complaint guidance for staff Complaint Handling Training	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Stage 1 letter template Internal Complaints guidance for staff Complaints Handling Training	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	Complaints Policy	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than	Yes	Complaints Policy	

	20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy Internal complaints guidance for staff Complaint Handling Training	
6.17	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes	Complaints Policy Internal complaints guidance for staff Complaint Handling Training	Upon review of Stage 2 complaints for 2023/2024 SCH have not identified any learning regarding the follow on of actions after a Stage 2 complaint
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Letter Templates Internal complaints guidance for staff Complaint handling training	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	Internal Complaints guidance for staff Complaint Handling Training Letter Templates	

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy;	Yes	Internal complaint guidance for staff Complaint Handling Training	

	• Changing policies, procedures or practices.			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	SCH-Remedies-Policy-March-2024.pdf (solihullcommunityhousing.org.uk) Internal complaints guidance for staff Complaint Handling Training	
7.3	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.	No	Letter templates Internal complaints guidance for staff Complaint Handling Training	Actions are not tracked centrally to allow appropriate oversight and updates once a complaint is closed. The Service Improvement Plan seeks to address this.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	SCH-Remedies-Policy-March-2024.pdf (solihullcommunityhousing.org.uk)	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the	Yes	Annual report	

	Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual report	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Subsidiary Business Continuity Plan	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaint Handling Training Internal complaints guidance for staff	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	No		SCH recognise that the complaint handling culture could be improved, positive service changes have been made as a result of complaint learning however we recognise that it's possible for us to increase the intelligence extracted from complaints and create a positive cycle of process improvement. This will be a key theme throughout the Service Improvement Plan
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	No	Member responsible for Complaints appointed Recruitment of Business Improvement Manager – allowing a focus on process improvement and data lead enhancements	As per 9.2 there is an opportunity to improve in relation to this point. The Service Improvement plan will aim to deliver compliance to this point.

			Board champion for complaints is a member of the tenants SHAPE panel Complaints reporting issued quarterly to board Complaint reporting issued quarterly on the website	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Head of Customer Experience	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Member Responsible for Complaints (SMBC) Complaints Champion (SCH)	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	MRC role and activities will be defined and planned throughout the year	

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	These elements will be considered within the role of the MRC's and the activities with SCH and SMBC	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and	No		SCH have an objective relating to complaints for all staff, however there is an opportunity to enhance this based on the criteria of this point. SCH will address this within the Service Improvement Plan

	c. act within the professional standards for engaging with complaints as set by any relevant professional body.			