

# Appendix B - Self-Assessment Form



This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually. Evidence should be included to support all statements with additional commentary as necessary. Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

## Section 1 - Definition of a complaint

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
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.	✓	GSA Complaints Policy (July 2023), Section 4.1 "Policy statement"
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.	✓	GSA Complaints Policy (July 2023), Section 4.1 "Policy statement" and 4.2 "Policy scope" GSA Complaints Policy (July 2023), Section 3. "Aims and Objectives" GSA Complaints Procedure – Landlord and Property Services (June 2023), Section 3.2 "Methods" & Section 5.2 "Third Party Complaints".
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.	✓	GSA Complaints Procedure – Landlord and Property Services (June 2023) Section 4. "Resolve" and Section 5. "Customer Care team"
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	✓	GSA Complaints Policy (July 2023), Section 4.1 "Policy statement" and 4.3 "Policy exclusions"
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.	✓	GSA Complaints Policy (July 2023), Section 4.3 "Policy exclusions"
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.	✓	GSA Complaints Policy (July 2023), Section 4.1 "Policy statement" and 4.3 "Policy exclusions"

## Section 1 - Definition of a complaint continued

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	✓	GSA Complaints Policy (July 2023), Section 4.1 "Policy statement" and 4.3 "Policy exclusions" combine to define both a complaint and a service request.  This is also included in our Complaints Process staff training module.
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.	✓	This is clear in our Customer Complaints Procedure available on the <a href="#">GSA website</a> and is included on email surveys.

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	✓	GSA Complaints Policy (July 2023), Section 3. "Aims and Objectives"  This confirms complaints are handled equally regardless of the channel through which they are received.  Also referred to in our new Vulnerable Customer Policy.
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.	✓	Customer complaints policies and procedures are available as pdf documents via the <a href="#">GSA website</a> .  This allows the use of accessibility tools built into commonly used browsers. We also include copies of these documents when responding to customer complaints.
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.	✓	Customer complaints policy and procedure is available on the <a href="#">GSA website</a> .  There is a separate process for our Care Service Complaints, which is also available on the <a href="#">GSA website</a> .

## Section 2 - Accessibility and awareness continued

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
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.	✓	GSA Complaints Policy (July 2023), Section 6. "Impact Assessments and Key Considerations"  Also referred to in our new Vulnerable Customer Policy.
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.	✓	This is available on the <a href="#">GSA website</a>  This is also sent to our customers with each Step 2 and 3 responses.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	✓	Customer complaints policy and procedure is available on the <a href="#">GSA website</a> .  There is a separate process for our Care Service Complaints, which is also available on the <a href="#">GSA website</a> .
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.	✓	Customer complaints policy and procedure is available on the <a href="#">GSA website</a> .  There is a separate process for our Care Service Complaints, which is also available on the <a href="#">GSA website</a> .

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	✓	Social media channels are monitored by our Contact Centre (Facebook messages) and by our Communications team for all other social media channels. Those receiving a complaint via social media respond privately (as opposed to publicly) and pass the complaint details to Customer Care, so that the Complaints Policy and Procedure can be followed.  GSA Complaints Policy (July 2023), Section 3. "Aims and Objectives"

## Section 3 - Complaint handling personnel

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	✓	GSA has a central Customer Care team who manage/administer all Step 2 (Customer Care) and Step 3 (Executive Review) cases.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	✓	<p>New colleagues in Customer Care go through an induction period, including systems training, mentoring and support. This includes completion of the HOS e-learning modules.</p> <p>Customer Care colleagues receive ongoing and ad-hoc support and coaching during line-management meetings, case reviews and case management supervision discussions.</p> <p>Customer Care is an independent department which is managed separately to any other team and colleagues are dedicated to complaint resolutions only, to ensure no conflicts of interest. If a colleague has a personal relationship with a customer or colleague involved in a complaint, they will not handle the complaint investigation or resolution.</p>

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
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>	✓	<p>Mandatory training for all colleagues includes modules relating to handling distressed customers. These skills are updated and relevant knowledge increased during training sessions in monthly team meetings.</p> <p>Each member of the Customer Care team also receives direct ad-hoc support and coaching during line-management meetings, case reviews and case management supervision discussions.</p> <p>These are supported by the GSA Complaints Procedure – Landlord and Property Services (June 2023).</p>

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	✓	Our "Stage One" is the Customer Care (Step 2) as we have a Resolve (Step 1) in place to provide quick (2 working day maximum) response on minor issues and service requests. Anything which cannot be addressed at Resolve, or anything which needs more detailed investigation (or where the customer specifically requests a full investigation) moves to Customer Care (Step 2).
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.	✓	Complaints at Customer Care (Step 2) are acknowledged within 2 working days or receipt as outlined in GSA Complaints Procedure – Landlord and Property Services (June 2023).  This is covered in our Complaints Procedure – Landlord and Property Services (June 2023) and is in place within the Customer Care Team.
4.6	A complaint investigation must be conducted in an impartial manner.	✓	Customer Care is an independent department which is managed separately to the organisation and colleagues are dedicated to complaint resolutions only to ensure no conflicts of interest. If a colleague has a personal relationship with a customer or colleague involved in a complaint they will not handle the complaint investigation or resolution.
4.7	The complaint handler must: <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>	✓	This is standard practice, and all complaint responses are checked by our Customer Liaison and Quality Manager to ensure fairness, accuracy, consistency and adherence to our policy and procedure.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	✓	All requests are considered and adhered to if reasonable and achievable.

## Section 4 - Complaint handling principles continued

### Mandatory 'must' requirements

Code 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>	✓	Our Complaints Procedure – Landlord and Property Services (June 2023) states that the assigned Customer Care Specialist will contact the customer to discuss the detail and impact of all issues arising in Step 2 (Customer Care) complaints.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	✓	<p>This is covered in our Complaints Procedure – Landlord and Property Services (June 2023) and included in the Customer Complaints Procedure document.</p> <p>This information is also included on Step 2 response letters and details of HOS escalation provided on Step 3 response letters.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate 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.	✓	It is rare we would decline escalation. Typical reasons would be an unreasonable amount of time, without valid reason, since the Step 2 complaint was responded to, or the customer wishing to include new complaint details which have not yet been investigated at Step 2. In either case the reason for decline would be clearly explained to the customer, and next steps provided as an alternative.
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.	✓	<p>All records, notes and letters relating to each complaint case are retained on file.</p> <p>Complaint files are stored on Sharepoint by address. Each address folder contains an individual complaint file for each previous complaint and/or MP enquiries received to date, so the full history is visible.</p> <p>Each complaint file is broken down into seven subfolders; Original Complaint and Acknowledgement, Investigation, Correspondence, Resolution Letter, Payment, Escalation and Follow on.</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.	✓	The GSA Unacceptable Behaviour Policy is available on the <a href="#">GSA website</a> and intranet.

## Section 4 - Complaint handling principles continued

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	✓	We do this across the organisation at each point of contact to manage expectations. For example, we provide information on repair responsibilities on our website, and are clear on issues which are residents responsibility, we signpost to the information when necessary. Contact Centre objectives are to provide this information at first contact to avoid raising expectations and causing unnecessary confusion. If a customer is asking for unreasonable or unrealistic compensation as a complaint resolution, we would explain this at the first point of contact to ensure expectations are managed.
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.	✓	Our Resolve (Step 1) allows for prompt (2 working days) resolution of minor issues and service requests, and our Customer Care (Step 2) stage is in line with the timescales of the HOS Code.
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.	✓	GSA Complaints Policy (July 2023), Section 3. "Aims and Objectives" GSA Complaints Policy (July 2023), Section 4. "Our Policy" With appropriate written authorisation from the customer, GSA will respond to a representative as and when requested.
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.	✓	It is standard practice to refer to the tenancy agreement and provide the relevant section wording to ensure obligations are clear and understood.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	✓	Our responses do identify members of staff by name where this is essential for transparency/clarity/understanding. However, where possible we only use first name and job title, excluding last names. Contractor employees are not named in responses, only the trading name of the contractor.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	✓	Where unavoidable delays impact response times, the customer is updated.
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.	✓	Our Voice of the Customer team manage and report on Complaints Satisfaction on a monthly basis to individual teams and organisation wide on a quarterly basis.

## Section 4 - Complaint handling principles continued

### Best practice 'should' requirements

Code 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.	✓	<p>Learnings are shared at the point of the investigation and at the end of the complaint to Heads of Service via Complaint Closure forms.</p> <p>They are also summarised in monthly Voice of the Customer sessions and via an interactive dashboard with all Heads of Service shared monthly.</p> <p>We hold regular Evergreen sessions (case reviews) to bring together colleagues involve in issues on more complex complaint cases, to review and agree actions for service improvement.</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.	✓	The GSA Unacceptable Behaviour Policy is available on the <a href="#">GSA website</a> and intranet.

## Section 5 - Complaint stages

### Mandatory 'must' requirements - Stage 1

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b>within 10 working days</b> 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.	✓	As we have recently been experiencing higher volumes, our acknowledgement letters have quoted a maximum 20 working day response time and have explained why this is necessary. For more straightforward cases, and for all cases once volumes reduce, we will respond within 10 working days.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	✓	We respond to Customer Care complaints as soon as answers are known. Cases do not remain open for actions (repairs for example) to be completed. Outstanding actions are tracked and monitored by the Customer Liaison and Quality Manager. If outstanding actions fail, Customer Care would work to resolve this as a follow on to the complaint, or a new Step 2 complaint depending on the circumstances.



## Section 5 - Complaint stages continued

### Mandatory 'must' requirements - Stage 1

Code section	Code requirement	Comply	Evidence, commentary and any explanations
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.	✓	This is standard practice and is also reviewed when response letters are checked as defined in our Complaints Procedure – Landlord and Property Services (June 2023).
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>	✓	These elements of any response are included in our standard outline/template for all Customer Care responses.

### Mandatory 'must' requirements - Stage 2

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	✓	Where requested, Customer Care cases escalate to Executive Review, unless published exclusions apply. Details of the escalation process are always included on the Step 2 response letters, asking customers to provide the reasons for their escalations and their desired outcome of the review.
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.	✓	Clarification is sought regarding customer's reasons for escalation where not provided initially. Details of the escalation process are always included on the Step 2 response letters and customers are informed we must have clear reasons for escalation so these can be addressed in the review.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	✓	This is as outlined in our procedures and followed.

## Section 5 - Complaint stages continued

### Mandatory 'must' requirements - Stage 2

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	✓	Executive Reviews are completed by the Director of Customer Services (or delegated authority).
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</b> 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.	✓	Our Complaints Procedure – Landlord and Property Services (June 2023) states 10 working days for an Executive Review response.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <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> <p>and</p> <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>	✓	This is all covered in our standard approach to Executive Review cases.

## Section 5 - Complaint stages continued

### Mandatory 'must' requirements - Stage 3

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	✓	GSA has two stages to the formal process: Step 2 (Customer Care) and Step 3 (Executive Review)  Our Step 1 (Resolve) is an informal resolution stage for minor issues, and service requests, with a 2 working day response time for all queries.
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>	✓	GSA has just two formal stages – therefore this section is not applicable.

### Best practice 'should' requirements - Stage 1

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	✓	Where we have had to do this, it is by exception and in agreement with the customer.
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.	✓	We would provide this advice in these circumstances.  We provide contact information for the Housing Ombudsman along the complaint process and advise the customer is able to approach them at any point.
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.	✓	Previous complaint responses are always reviewed as part of a new investigation and referenced to the customer if appropriate.

## Section 5 - Complaint stages continued

### Best practice 'should' requirements - Stage 1

Code section	Code requirement	Comply	Evidence, commentary and any explanations
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.	✓	This is the approach we take.

### Best practice 'should' requirements - Stage 2

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	✓	This is done in consultation with the complainant.
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	✓	This has not occurred to date, but should it be the case we would follow this guidance.

### Best practice 'should' requirements - Stage 3

Code section	Code requirement	Comply	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not have a formal third stage.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not have a formal third stage.

## Section 6 - Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	✓	Our format for Customer Care and Executive Review responses provides for this, as does our requirement for all response letters to be checked by our Customer Liaison and Quality Manager.  Our Customer Liaison and Quality Manager shares complaint closure forms with Heads of Service at the conclusion of the complaint to highlight the learnings and recommended actions.
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.	✓	As for 6.1 and in addition we have the GSA Compensation Policy & Procedure for guidance and to ensure fairness to all customers where compensation is required.
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.	✓	Our Customer Liaison and Quality Manager tracks all actions and promises made as part of a complaint response to ensure delivery. These are shared with the relevant teams who are required to carry out the remedy/action.
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.	✓	The GSA Compensation Policy & Procedure for guidance and to ensure fairness to all customers where compensation is required.

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	✓	We have various mechanisms in place for sharing learning from complaints and ensuring service improvement are made: This is done at the point of the investigation, through complaint closure summaries, via the Voice of the Customer monthly sessions, via the monthly learning dashboard and also, on more complex cases, via Evergreen Session.
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.	✓	Customers are asked to utilise the Complaints procedure before making a Disrepair Claim. Compensation will be offered as a resolution to the complaint, if appropriate, and does not remove their right to proceed with a Disrepair Claim. Legal advice is sought during the complaint investigation if this is appropriate.

## Section 7 - Continuous learning and improvement

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	✓	<p>GSA Complaints Policy (July 2023), Section 7. "Monitoring and Reporting"</p> <p>GSA Complaints Policy (July 2023), Section 8. "Quality Assurance"</p> <p>GSA has various mechanisms in place for sharing learning from complaint and ensuring service improvement are made.</p> <p>This is done at the point of the investigation, via complaint closure summaries, via the Voice of the Customer monthly sessions and also, on more complex cases, via Evergreen Session.</p> <p>In addition, learning/improvements are shared on our Voice of the Customer website section, and in our Annual Report. Our Customer Panel also has oversight of monthly performance on complaints and of our Evergreen Sessions.</p> <p>Complaint performance and customer satisfaction for different areas of the organisation, including complaints, is shared on our website via an infographic and through our social media channels. This information is updated monthly and shows trends in performance.</p>

## Section 7 - Continuous learning and improvement continued

### Best practice 'should' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	✓	Our Homes and Customer Experience Committee are assigned as overseer/lead on customer complaints; meaning the Chair - who also sits on our Board - has ultimate oversight. Information on complaint volumes, outcomes and learnings are shared quarterly and HOS Determinations are also shared when received, via our Executive Team.
7.4	As a minimum, governing bodies should receive: <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. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	✓	GSA Complaints Policy (July 2023), Section 7. "Monitoring and Reporting"  GSA Complaints Policy (July 2023), Section 8. "Quality Assurance"
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	✓	Learning themes and trends are shared monthly with senior management to identify issues and risks and enable them to proactively improve the performance of their business areas.
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>	✓	We have produced a complaint handling training video to highlight and explain everyone plays a role in a complaint journey. This has been shared across the organisation via our Corporate Comms, as well as at our recent all colleague conference. The video has been shared and discussed with individual teams during Complaint Roadshows held by our Customer Care Manager and Customer Liaison and Quality Manager throughout the year.

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	✓	Our annual self-assessments are published on the <a href="#">GSA website</a> .
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	✓	We completed this in 2021 following our merger.
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>	✓	Our self-assessment is reviewed by our Homes and Communities Committee and then published on our website annually and a link to this is included in our annual report.