

## Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

### Section 1 - Definition of a complaint

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as:  <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Legal & General Affordable Homes (LGAH) Complaints Policy includes the exact definition as outlined by the Housing Ombudsman Service (HOS) Complaint Handling Code.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	LGAH Complaints Policy aligns to this approach, where the word 'complaint' does not need to be used for a complaint to be raised. Any complaint raised by a third party who has valid authority to act for the customer will be investigated in line with LGAH Complaints Policy.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	If a customer's issue cannot be resolved quickly to their satisfaction or they ask for a complaint to be logged, the issue will be logged and handled through the LGAH's Complaints Policy
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	There are exclusions within LGAH's Complaints Policy. If LGAH cannot consider a complaint because of an exclusion, it would contact the customer to explain and signpost them to the most appropriate service that can help them. The current exclusions are:

			<ul style="list-style-type: none"> <li>• Where the issue is part of any ongoing legal action.</li> <li>• Where an issue has already been handled under the Policy.</li> <li>• Complaints of anti-social behaviour by another individual, will be handled under the terms of our anti-social behaviour policy. We will however deal with complaints where the customer feels we have not followed our anti-social behaviour policy or process correctly.</li> <li>• Complaints relating to General Data Protection Regulation (GDPR) legislation.</li> <li>• Any expression of dissatisfaction which is outside of LGAH's' responsibilities (for example, a customer may complain to LGAH or one of our partners about a service offered by another organisation, such as a local authority). In those circumstances we will help you to direct your complaint to the right organisation.</li> </ul> <p>LGAH would accept all other complaints and deal with them in accordance with its Complaint Policy.</p>
<b>1.8</b>	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	There are exclusions are in LGAH's Complaints Policy. If LGAH cannot consider a complaint because of an exclusion, it would contact the customer to explain and signpost them to the most appropriate service that can help them.
<b>1.9</b>	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	If LGAH do not accept a complaint, a detailed explanation would be provided. In these cases, LGAH would provide information about the right to take the decision to the HOS.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	<p>LGAH recognises the difference between an issue which can be resolved quickly and is unlikely to be a service failure, compared to a service failure, dissatisfaction from the customer or the need for repeated contact by the customer to resolve a matter.</p> <p>In all cases, if the customer is unhappy about a particular issue, LGAH will raise this as a complaint and it will be logged and handled by a dedicated member of the team, in line with LGAH Complaints Policy.</p>
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.	Yes	All completed surveys are reviewed by LGAH's Customer Experience Lead and where a customer expresses any dissatisfaction with LGAH's products or services they are promptly contacted by a member of the Customer Care Team and where necessary a complaint will be logged and processed in line with the LGAH's Complaints Policy.

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>LGAH make it easy for a customer to complain and this includes all channels listed within the HOS Complaint Handling Code.</p> <p>Complaints in the first instance go to LGAH's Management Provider responsible for that property to assess the complaint and to determine the best course of action. This may include a direct referral to LGAH. In all circumstances LGAH Complaints Policy is followed.</p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>LGAH's Complaints Policy is published online <a href="https://www.landgah.com/Feedback-Complaints-Legal-General-Affordable-Homes">Feedback &amp; Complaints - Legal &amp; General Affordable Homes (landgah.com)</a> and available in other formats on request. Where possible, LGAH's Management Providers also host a copy of the Complaints Policy on their own websites. The Complaints Policy gives an overview on what is involved at stage 1 and stage 2 of the complaint process and how to contact the HOS.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>LGAH's website hosts the Complaints Policy in full which includes how to raise a complaint <a href="https://www.landgah.com/Feedback-Complaints-Legal-General-Affordable-Homes">Feedback &amp; Complaints - Legal &amp; General Affordable Homes (landgah.com)</a>. The policy is two clicks away from the main home page.</p>

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>This statement is in the Complaints Policy – ‘Legal &amp; General Affordable Homes is committed to helping customers to access information about their homes and services in a way that suits your individual needs. This includes supporting vulnerable customers, if you need additional support with making a complaint or understanding the outcome.’</p> <p>Colleagues handling complaints are aware of LGAH's agreed resources and processes to adapt services and communication considering the customer needs.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>LGAH's Management Providers who provide housing management services to its customers, are responsible for all customer communication and are responsible for complaint handling in the first instance.</p> <p>Management Providers host a copy of LGAH's Complaints Policy on their own websites where they have dedicated pages for LGAH customers.</p> <p>Within LGAH's complaint page on the website, section 3 specifically outlines the HOS Complaint Handling Code and a copy of the HOS leaflet for residents is provided to all customers who have raised a complaint as part of its response.</p> <p>LGAH's Complaint Policy is also sign posted in new customer onboarding communication and LGAH will update this to include the Housing Ombudsman contact details.</p> <p>LGAH summarise complaints performance in the Annual Customer Report which is published on our website <a href="#">legal-and-general-</a></p>

			<a href="#">affordable-homes-customer-annual-report-2022.pdf (legalandgeneral.com)</a> [page 10]
<b>2.7</b>	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	LGAH Management Providers oversee regular correspondence with its customers and information about the Ombudsman is included.  The Housing Ombudsman information is included in responses to complaints at all stages.
<b>2.8</b>	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	The HOS is referenced in LGAH /Management Provider complaint stage one and stage two responses and outlined/documentated in any associated conversations.

#### Best practice 'should' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>2.2</b>	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	A complaint received by social media would be treated the same as receiving a complaint from any channel. A social media complaint is acted upon through a direct message with the customer and taken out of the public domain to preserve confidentiality and to comply with data protection. Legal & General Group social media channels are monitored throughout the day by a specialist team and any complaint linked to LGAH is immediately passed onto the relevant team.

### Section 3 - Complaint handling personnel

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	LGAH has a dedicated team responsible for complaint handling. LGAH Management Providers also have dedicated complaints teams who manage LGAH customer complaints. Monthly performance updates on complaints are provided to LGAH's senior management team, and regular performance updates are provided to LGAH's Registered Provider Boards.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All those handling complaints have the appropriate skills from accumulated knowledge in the industry. The team handling complaints are separate to our team directly working with customers and suppliers and we would always encourage our colleagues to consider and flag any conflict of interest. This would be validated by LGAH's Operations Director who has ultimate sign off of complaint responses.

#### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> </ul>	Yes	All those handling complaints have the appropriate skills from accumulated knowledge & training in the industry. LGAH's dedicated team handling complaints from customers have the authority, autonomy and focus to

	<ul style="list-style-type: none"> <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>make recommendations to ensure fair outcomes for our customers.</p> <p>LGAH monitors that the team handling complaints are all offered refresher training in complaint management, dispute resolution and dealing with vulnerable customers. In addition to keeping technical and process skills in complaint handling up to date, we also ensure our focus on empathy and the softer human skills needed to successfully handle complaints are given equal prominence.</p> <p>LGAH customers are invited to give feedback on complaint handling in a post-event satisfaction survey. These results are shared with the team where they are encouraged to reflect and suggest improvements.</p>
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#### Section 4 - Complaint handling principles

##### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt.</b></p>	Yes	<p>Recommendations and outcomes of complaint decisions are always discussed with customers and followed up in writing to ensure understanding.</p> <p>If a customer's 'concern', escalates to a complaint this is recognised and logged on the LGAH's customer relationship management system – Brolly and managed in accordance with its Complaints Policy.</p> <p>LGAH follow the HOS guidance and have a two-stage complaints process.</p>



			Stage 1 complaints are acknowledged within 5 business days of receipt.
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.	Yes	LGAH usually acknowledge complaints by telephone to ensure they understand the customer's situation and what they feel is a fair resolution. LGAH then repeat that understanding of the complaint in their response letter and the customer's desired outcome. Customers are asked to keep us informed of any change in their circumstances for the duration of the complaint.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints are conducted without bias and impartially. Complaint outcomes are validated by the Operations Director who has ultimate sign off of responses.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<p>All those handling complaints have the appropriate skills from accumulated knowledge in the industry. Where specialised insights are required, LGAH would work alongside other Managers and subject matter experts for support. Those handling complaints from customers have the authority, autonomy and focus to make recommendations to ensure fair outcomes for customers.</p> <p>Any identified conflict of interests are raised, and if required, a complaint is assigned to another Case Officer.</p> <p>Customers are invited to give feedback on the complaint handling in a post-event satisfaction survey. These results are shared with the team where they are encouraged to reflect and suggest improvements.</p>

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Frequency, method and best times to communicate are agreed specifically with each customer and noted on the Customer Relationship Management system (Brolly) so all colleagues are aware.
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>	Yes	<p>Through complaint acknowledgements, LGAH attempts to telephone the customer to discuss their complaint. This allows the customer to set out their position and the impact the service/product failure has had on them in more detail.</p> <p>Where possible, subsequent updates and the final decision are communicated by telephone to ensure customers understanding and maintain their right to comment before a formal complaint response letter is issued.</p> <p>A staff member subject to a complaint has the opportunity as part of the evidence gathering to outline circumstances as they see them, and any subsequent findings/recommendations discussed.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The HOS reviewed LGAH's Complaint Policy in April 2023. This resulted in LGAH adding a 4 week escalation time period. However, if an escalation was made beyond this date, it would be reviewed and accepted if reasonable.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	LGAH will accept all requests to escalate a complaint at any point. If the escalation is defined as an exclusion, they would clearly explain that to the customer. This is in line with LGAH Complaints Policy.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the	Yes	All stages of a complaint, discussions and correspondence are date-stamped and

	resident, correspondence with other parties and any reports or surveys prepared.		recorded in the Customer Relationship Management System (Brolly)
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	LGAH's Unacceptable Behaviour Policy is embedded in its Complaints Policy which is sent to all customers at the time of a complaint. Colleagues handling complaints are all aware of the policy and the support LGAH will provide them if they are subject to unacceptable behaviour from anyone they are dealing with.

#### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	LGAH colleagues attempt to call customers as part of acknowledging a complaint to discuss the outcome expected by a customer. At this stage expectations are managed with the customer if needed, and this includes being clear on what can be delivered.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	LGAH colleagues are focused initially on resolving the complaint and keeping customers safe from risk and harm. Internal investigations often come after the customer's complaint has been resolved to an acceptable outcome. LGAH always asks customers to keep them informed throughout the complaint of any change in their circumstances which might affect how they are dealt with.

4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	With the correct authority, LGAH would always deal with a customer representative if 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.	Yes	Where possible, LGAH will use in-house subject matter experts to support the understanding of its legal obligations. If LGAH are unsure of the extent of their legal obligations, they take advice from external legal advisors. This information will be shared with customers as part of complaint resolution.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	LGAH generally refer to colleagues/contractors by their job titles, but will specifically name a colleague managing a complaint to support honesty, transparency and build a connection with the customer.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	LGAH would agree the frequency to contact and update the customer in regard to the progress of their complaint. If there are delays or longer is needed to investigate a complaint, they will notify and agree this with the customer.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>LGAH gather feedback on complaint handling from annual surveys carried out by the Institute of Customer Service and the Tenant Satisfaction Measures. LGAH also send an 'in the moment' survey post complaint resolution. The results help them understand where they are doing well and identifies areas for improvement.</p> <p>In 2023, LGAH Board members and Executive Team held an in-person customer session with some customers who have raised a complaint to understand their</p>

			experiences and what LGAH need to improve on as part of their service provisions.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Complaint information is reported monthly in LGAH's performance management packs and reviewed by its Executive Team. Complaint volumes, trends and learnings are also published online <a href="#">Building affordable communities   Affordable Homes   Legal &amp; General (legalandgeneral.com)</a> . Complaint awareness sessions for the whole division are hosted periodically.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Where restrictions are placed on customer contact, a senior case owner will be allocated to manage any complaints made to ensure fair access to services alongside protecting its staff.

## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></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.	Yes	LGAH would respond to a complaint within 10 working days. If there are delays, complex issues or longer is needed to investigate a complaint, they would notify and agree an extension with the customer. LGAH always ask customers to keep them informed throughout the complaint of any change in their circumstances which might affect how they deal with them

5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	<p>LGAH would respond to a complaint as soon a resolution was proposed, however at times it may keep the complaint open until full resolution depending on the complexity of the complaint case. In all cases this will be agreed with the customers and regular communication is maintained to provide progress updates.</p> <p>Often a customer will ask that the final response is only given once all items of a complaint are addressed and rectified, especially when the resolution is outsourced to a third party acting on LGAH's behalf.</p>
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	All points are individually summarised and responded to, and all complaint responses follow a standard template and approach. Where possible decisions will be discussed with the customer over the telephone first and then followed up in writing. LGAH's approach complies with the HOS Complaints Handling Code.
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <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>	Yes	LGAH have developed guidance templates to ensure stage one and stage two responses following the HOS Complaints Handling Code requirements, so all responses are full and comprehensive. These are regularly reviewed. Colleagues are reminded regularly the importance of communicating in clear language and to avoid using jargon or housing terminology.

## Stage 2

Code section	Code requirement	Comply: Yes/No	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.	Yes	LGAH will accept all requests to escalate a complaint at any point. If the escalation is defined as an exclusion, it would clearly explain that to the customer.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Where possible, LGAH acknowledge complaints by telephone to ensure it understands the customers situation and what they feel is a fair resolution. LGAH will repeat its understanding of the complaint in the response letter and the customers desired outcome. LGAH ask the customer to keep them informed of any change in their circumstances for the duration of the complaint.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	LGAH's approach complies with the HOS Complaint Handling Code.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Where an escalation occurs, the stage two complaint will be handled by a member of the LGAH team. If the Stage one complaint was handled by a member of LGAH, the stage two will be handled by a more senior member of the team which has not been directly involved in the stage one investigation or response.
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></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.	Yes	LGAH aim to complete a stage two complaint within 10 business days. If there are delays, complex issues or longer is needed to investigate a complaint, they will notify and agree an extension with the customer. LGAH always ask customers to keep them informed

			throughout the complaint of any change in their circumstances which might affect how they are dealt with.
<b>5.16</b>	<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><b>and</b></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>	Yes	<p>LGAH have developed guidance templates to ensure stage two responses follow the code requirements, so all responses are full and comprehensive. LGAH remind colleagues regularly the importance of communicating in clear language and to avoid using jargon or housing terminology.</p> <p>Complaint responses include providing a copy of LGAH Complaints Policy and a leaflet about the Housing Ombudsman Service.</p> <p>LGAH do not have a stage three.</p>

### Stage 3

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.17</b>	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.	NA	LGAH do not have a three-stage complaint process.
<b>5.20</b>	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> </ul>	NA	LGAH do not have a three-stage complaint process.



	<ul style="list-style-type: none"> <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>		
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### Best practice 'should' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	If there are delays, complex issues or longer is needed to investigate a complaint, LGAH will notify and agree an extension with the customer. LGAH always ask customers to keep them informed throughout the complaint of any change in their circumstances which might affect how they are dealt with.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	This situation has not arisen in LGAH where this action was needed, however if it did, details of the HOS would be provided.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	LGAH would gather all relevant historical evidence to ensure they make a full informed investigation and response

<b>5.7</b>	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	For simplicity customers, LGAH would incorporate any additional points of a complaint into the current stage it is managing. If a stage has concluded, it would be logged as a new complaint
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## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>5.14</b>	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	If there are delays, complex issues or longer is needed to investigate a stage two complaint, LGAH will notify and agree an extension with the customer. LGAH always ask customers to keep them informed throughout the complaint of any change in their circumstances which might affect how they are dealt with.
<b>5.15</b>	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This situation has not arisen in LGAH where this action was needed, however if it did, details of the HOS would be provided.

## Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> 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.	NA	LGAH do not have a three-stage complaint process.
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.	NA	LGAH do not have a three-stage complaint process.

## Section 6 - Putting things right

## Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Actions to resolve complaints are proposed by the complaint handler in agreement with the customer, ensuring LGAH put things right and the complaint outcome is fair and appropriate. LGAH's approach is customer centred and focusses on quick resolution to issues experienced by customers.

6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Redress is always discussed with a customer and reviewed by LGAH's Operations Director prior to a formal response being provided to the customer. In all cases, LGAH aims to offer fair and reasonable remedies which would not detriment other residents. If other residents are affected by the same issue but do not complain, they would be offered the same redress.  LGAH follows the HOS guidance on remedies.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	LGAH does not close a complaint internally until it is satisfied that all actions have been completed as agreed within the complaint responses. Actions and remedies are clearly outlined in response letters to customers.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	When considering appropriate compensation, LGAH refer to the HOS guidance on remedies. LGAH do recognise each complaint event is different and should be judged on their own merits, and issues may affect customers in different ways

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Complaint root cause and identification of additional customers that may be affected by the same issue are considered in LGAH complaint investigations. If other residents are affected by the same issue but do not complain, they would be offered the same redress.

6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Where possible, LGAH will use in-house subject matter experts to support understanding of customer entitlement to redress. If unsure of the extent of a customer's legal entitlement, they would seek advice from external legal advisers
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### Section 7 - Continuous learning and improvement

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Complaint information is reported monthly in performance management packs and reviewed by senior members of staff. Complaint volumes, trends and learnings are also published on the internet site <a href="#">Building affordable communities   Affordable Homes   Legal &amp; General (legalandgeneral.com)</a> . Complaint awareness sessions for the whole division are hosted periodically.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	<p>LGAH's Chief Executive maintains this responsibility, with LGAH Operations Director providing regular performance reports on complaints performance and trend analysis.</p> <p>LGAH Board scrutinise regular performance information on complaints and this includes holding an in-person customer session in 2023, with a group of customers who have raised a complaint to understand their experiences and what LGAH need to improve on as part of their service provisions.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	<p>LGAH Operations Director provides this information at Executive and Board level. All HOS complaint outcomes linked to a LGAH case are reported back to Board for wider awareness.</p> <p>The self-assessment against the Complaint Handling Code is provided to the Board for comment and challenge before it is published and all HOS case judgements in relation to a LGAH complaint are shared with Board members.</p>

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Complaints are reported monthly in performance reporting which is reviewed by LGAH's Operational Teams and Senior Management. Any learning themes, potential systemic issues or serious risks are discussed and incorporated into training or colleague briefings.
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>	No	This will be introduced as an annual objective from March 2024 for all customer facing roles in the business.

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Self-assessment will be reviewed annually alongside our complaint policy
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Noted. If necessary, LGAH would carry out an additional self-assessment outside of the annual review.
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>	Yes	<p>LGAH self-assessment is shared with its Board for review and approval before wider publication.</p> <p>The self-assessment outcome is published on the LGAH website, and the self-assessment will be linked into the Customer Annual Report due in Q1 2024.</p>

