



**Compliance with the Complaint Handling Code**

1. Definition of a complaint	Yes	No	Current approach	Proposed Change	Change Implemented
<p><b>Does the complaints process use the following definition of a complaint?</b></p> <p><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></p>		X	<p>The Group’s Policy has a similar definition:</p> <p><i>‘An expression of dissatisfaction about a Jigsaw Homes Group action, lack of action, or standards of service; where an initial response has not proven satisfactory’.</i></p>	<p>Proposed new definition:</p> <p><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; where an initial informal response has not proven satisfactory.</i></p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>
<p><b>Does the policy have exclusions where a complaint will not be considered?</b></p>	X				
<p><b>Are these exclusions reasonable and fair to residents?</b></p>	X		<p>There are some circumstances where we will not accept a formal complaint. However, in some of these circumstances we may internally investigate to ensure we continue to provide the best possible service.</p> <p>The Chief Executive’s Department will contact the customer and explain why the complaint cannot</p>	<p>We consulted tenants on our Complaints Policy through our Jigsaw Rewards platform, including a question about our exclusions.</p> <p>The findings from the survey support the current exclusions. 89% of respondents agreed that the exclusions are reasonable. Some comments would suggest we need to provide further clarification on some of the exclusions which we have reflected in the revised</p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>

			be considered under the policy; they will also signpost to the most appropriate service or team to progress the matter in the suitable way.	Policy.	
<b>2. Accessibility</b>	<b>Yes</b>	<b>No</b>	<b>Current approach</b>	<b>Proposed Change</b>	<b>Change Implemented</b>
<b>Are multiple accessibility routes available for residents to make a complaint?</b>	X		Customers can make a complaint or expression of dissatisfaction through the following channels: <ul style="list-style-type: none"> <li>• In writing</li> <li>• By telephone</li> <li>• By email</li> <li>• In person at our offices or Hubs</li> <li>• Social media</li> </ul>	No changes required	N/A
<b>Is the complaints policy and procedure available online?</b>	X		Complaints Policy and Customer Guide to Complaints available on all websites under the 'get in touch' section.	No changes required	N/A
<b>Do we have a reasonable adjustments policy?</b>		X	We do not have a specific Policy; however our Customer Contact Strategy explains that if a particular channel for a service may disadvantage some customers, in particular customers with a disability or a language need, reasonable adjustments will be	No changes required.	N/A



			<p>made to ensure access to the service is maintained.</p> <p>Our Complaints Policy includes section; ‘Help in making a complaint’ with advice to contact the Chief Executive’s Department if customers need help making a complaint.</p>		
Do we regularly advise residents about our complaints process?	X		<p>Complaints Policy and Customer Guide to Complaints is published on all websites.</p> <p>We publish complaints information in our tenant’s annual report.</p>	Guidance has been included in new training videos for front line teams.	October 2020
<b>3. Complaints team and process</b>	<b>Yes</b>	<b>No</b>	<b>Current approach</b>	<b>Proposed Change</b>	<b>Change Implemented</b>
Is there a complaint officer or equivalent in post?	X		<p>We do not have a designated ‘Complaints Officer’; we have a designated team (Chief Executive’s Department) responsible for the handling and investigation of complaints through the formal process.</p>	No changes required.	N/A

Does the complaint officer have autonomy to resolve complaints?	X		The Chief Executive's Department work with managers from other departments to resolve complaints which can include challenging decisions to ensure the customer receives a fair and reasonable outcome to their complaint.	No changes required.	N/A
Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	X				
If there is a third stage to the complaints procedure are residents involved in the decision making?		X	The current approach at the third and final step of the process is that the request is required to meet criteria as set out in the Policy and guidance document.	Our proposed new approach is to remove the criteria; however a senior manager will still assess the reasons for the escalation and make the final decision. If we feel that the reason for escalation does not require a full review and can be resolved by the Chief Executive's Department, we will take this approach.	Revised Complaints Policy approved by Board 3 <sup>rd</sup> December 2020 To be implemented 4.1.2021
Is any third stage optional for residents?	X				
Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	X		Our Customer Guide to Complaints is provided at each stage of the complaints process. This document provides information about our internal process, designated persons and the Housing Ombudsman Service.	No changes required.	N/A
Do we keep a record of complaint correspondence including correspondence from the resident?	X		The Chief Executive's Department has bespoke systems to record and save correspondence relating to formal complaints.	No changes required.	N/A

			Informal 'complaints' or dissatisfaction is recorded in our customer contact systems (CRM).		
<b>At what stage are most complaints resolved?</b>			Indicative data suggests the majority of complaints are resolved at the first step - 'Put It Right' by the relevant service departments as we note a reduction in escalations for investigation at the second step of the formal process.	Implementation of a new Group Customer Contact/Housing Management System in November 2020 will help us to report, understand and learn from dissatisfaction and informal complaints.	On-going
<b>4. Communication</b>	<b>Yes</b>	<b>No</b>	<b>Current approach</b>	<b>Proposed Change</b>	<b>Change Implemented</b>
Are residents kept informed and updated during the complaints process?	X				
Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	X		<p>If a complaint is accepted for final review, customers are sent a copy of the complaint file evidence that will be provided to the review panel and are asked if they wish to provide any further evidence for consideration.</p> <p>A customer is not able to challenge the decision from the Executive Director panel. If the customer remains unhappy with our final response, we advise of further</p>	No changes required.	N/A

			external options available.		
<b>Are all complaints acknowledged and logged within five days?</b>		X	<p>Complaints handled at the first step of the current process (Put It Right) are handled by a manager from the relevant service department and may not always be formally acknowledged as these complaints are normally resolved quickly by a telephone call or email.</p> <p>Complaints being handled through the formal process by the designated complaints team (Chief Executive’s Department) are logged and acknowledged within five working days.</p>	<p>Our revised approach in response to the Housing Ombudsman code has removed the first ‘Put It Right’ step from the formal process to reduce our formal process from 3 stages to 2.</p> <p>We will continue to respond to first expressions of dissatisfaction as informal complaints outside the formal process.</p> <p>Staff will escalate to the formal process if a customer remains unhappy with our informal response.</p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>
<b>What proportion of complaints are resolved at stage one?</b>			<p>Our current stage 1 is the ‘Put It Right’ step. These complaints are handled by managers in the relevant service department. We do not have reliable data to support accurate reporting; however a reduction in complaint investigations at stage 2 would indicate teams are able to put things right for customers without the need for lengthy investigations.</p>	<p>We propose to remove the first ‘Put It Right’ step from the formal process and replace with a clear 2 stage formal process. The first step of the formal process will be an Investigation by the designated complaints team (Chief Executive’s Department).</p> <p>We will provide more accurate data for this question in future assessments following the approval of the revised new two stage process.</p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>
<b>What proportion of complaints are</b>			<p>Unable to answer for the first self assessment as we currently have a 3</p>	<p>We will make changes to the complaints database system to include</p>	<p>Revised Complaints</p>



<p>resolved at stage two?</p>			<p>stage process.</p>	<p>an additional field to report against this question in future assessments following approval of the revised Complaints Policy.</p>	<p>Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021  System improvements made December 2020</p>
<p>What proportion of complaint responses are sent within Code timescales?</p> <ul style="list-style-type: none"> <li>• Stage one</li> <li>• Stage one (with extension)</li> <li>• Stage two</li> <li>• Stage two (with extension)</li> </ul>			<p>We are only able to answer this in part as we currently operate a three stage process not two.</p> <p>Current Policy/Process -</p> <p>Stage one - Put It Right. As these complaints are handled by the individual service departments, we do not hold reliable data to report confidently.</p> <p>Stage two - These are complaints escalated and investigated by the designated complaints team.</p> <p>2019/20:</p> <p>84 cases in total</p> <p>46 responded within 1- 10 working days</p>	<p>We will provide this information for future assessments following the approval of the revised two stage process.</p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>

			<p>35 responded between 11-20 working days</p> <p>3 responded over 20 working days (complex cases and extension agreed with customer)</p>		
Where timescales have been extended did we have good reason?	X		We always aim to resolve complaints within the Housing Ombudsman code timescales of 10 working days. The reasons for extending timescale is usually due to the complexity of the issue, number of issues being raised and on occasions availability of staff to answer queries as part of the complaint investigation.	No changes required.	N/A
Where timescales have been extended did we keep the resident informed?	X		Holding responses are always sent to a customer to explain the reason for the delay in responding to their complaint. The holding response may be a documented phone call, email or letter depending on the communication channel being used on the case.	No changes required.	N/A
<b>5. Cooperation with Housing Ombudsman Service</b>	<b>Yes</b>	<b>No</b>	<b>Current approach</b>	<b>Proposed Change</b>	<b>Change Implemented</b>

Were all requests for evidence responded to within 15 days?		X	In most cases we are able to respond to the Housing Ombudsman Service requests for evidence within 15 days, however depending on the complexity of the case and amount of information we need to provide, we sometimes need more time to collate and appropriately redact information in line with GDPR.  An example of this would be a long-standing anti-social behaviour issue with several case management files.	N/A	N/A
Where the timescale was extended did we keep the Ombudsman informed?	X		We always seek agreement from the Housing Ombudsman to extend timescales.	No changes required.	N/A
<b>6. Fairness in complaint handling</b>	<b>Yes</b>	<b>No</b>	<b>Current approach</b>	<b>Proposed Change</b>	<b>Change Implemented</b>
Are residents able to complain via a representative throughout?	X		Providing we receive signed authorisation or other valid evidence to support that a representative is acting on a customer's behalf, we will accept the complaint.	No changes required.	N/A
If advice was given, was this accurate and easy to understand?			We do not provide or issue any standard advice about representatives and we assess on a case by case basis taking advice	No changes required.	N/A



			from our Group Data Protection Officer as required.		
<p>How many cases did we refuse to escalate?</p> <p>What was the reason for the refusal?</p>			<p>We will always try to resolve complaints internally and we consider all requests for escalation.</p> <p>The current approach to the third and final stage of the process is that the request to escalate is required to meet criteria as set out in the Policy and guidance document.</p> <p>We do not always accept a complaint for full review by two Executive Directors if we are satisfied that the complaint investigation has answered all parts of the complaint satisfactorily or a manager from the Chief Executive's Department feels they can answer the escalated concerns without the need for a full review. This is set out in the Complaints Policy and Customer Guide to Complaints.</p>	<p>Our proposed new approach is to remove the 'Review' criteria to ensure we consider all requests for escalation; however a senior manager will still assess the reasons for the escalation and make the final decision.</p> <p>If we feel that the reason for escalation does not require a full review and can be resolved by the Chief Executive's Department, we will take this approach.</p>	<p>Revised Complaints Policy approved by Board 3<sup>rd</sup> December 2020 To be implemented 4.1.2021</p>
<p>Did we explain our decision to the resident?</p>	X		<p>All requests for escalation are responded to in writing either by email or letter with reasons for our decision.</p>	<p>No changes required.</p>	N/A



7. Outcomes and remedies	Yes	No	Current approach	Proposed Change	Change Implemented
<p>Where something has gone wrong are we taking appropriate steps to put things right?</p>	<p>X</p>		<p>Operate a Group Compensation Policy.</p> <p>We refer to the Housing Ombudsman’s guidance and remedies document for appropriate redress and remedy.</p> <p>Compensation requests are handled by the Chief Executive’s Department to ensure fairness and consistency.</p> <p>We continue to see relatively low complaint escalations from the first step of the process which would suggest that we are able to resolve issues quickly at first point of contact or through the relevant service departments.</p> <p>We continue to receive positive determinations from the Housing Ombudsman Service which further supports that we have a fair and efficient complaints handling service.</p>	<p>No changes required.</p>	<p>N/A</p>



	Yes	No	Current approach	Proposed Change	Change Implemented
<b>8. Continuous learning and improvement</b>					
<b>What improvements have we made as a result of learning from complaints?</b>			<p>The main learning theme from our complaints is communication and keeping our customers better updated and informed.</p> <p>We are in the process of implementing a new Group Customer Contact/Housing Management system which will consistently record customer contact, dissatisfaction and informal complaints to help us learn and continually improve our services.</p> <p>We use learning from complaints and dissatisfaction to help us with process design and training.</p>	<p>Include more information about improvements from complaints and customer feedback in our Tenants Annual Report.</p> <p>Results from the recent Jigsaw Rewards consultation exercise told us that tenants would like to see information about complaint learning every 3 months.</p> <p>We will publish information on our websites every 3 months from January 2021.</p>	<p>January 2021 onwards</p>
<b>How do we share these lessons with:</b>  a) residents?			<p>We currently report complaint numbers and percentage outcomes (Upheld, not upheld or upheld in part) in our Tenants Annual report.</p>	<p>More detailed information about learning from complaints and feedback will be published on our websites every 3 months and annually in our Tenant's Annual report.</p>	<p>January 2021 onwards</p>



<p>b) the board/governing body?</p> <p>c) In the Annual Report?</p>			<p>Complaints and Customer Satisfaction information is reported quarterly to our Executive Management Team and subsidiary Boards.</p>		
<p>Has the Code made a difference to how we respond to complaints?</p>	<p>X</p>				
<p>What changes have we made?</p>			<ul style="list-style-type: none"> <li>• Revised complaints Policy reducing the formal complaints process to a 2 stage process.</li> <li>• Removed the ‘Review’ criteria from the current third stage of the process. All requests to escalate a complaint to the final step of the formal process will be considered, however where we feel that a complaint does not require a full review, we will still take this approach where we feel it is appropriate explaining the reasons for our decision.</li> <li>• Consulted on our approach to handling complaints through Jigsaw Rewards survey. The key findings will be published on our websites.</li> <li>• Briefed our Senior Management Team on the new Housing Ombudsman code and the importance of effective handling of customer dissatisfaction and complaints.</li> <li>• Revised complaints and dissatisfaction guidance included in training videos for front line staff.</li> <li>• Further developed our complaints database system to align reporting complaints information to the new Housing Ombudsman Code self assessment.</li> </ul>		