

# Housing Ombudsman Complaint Handling Code: Self-assessment – October 2022

Aster is a member of the Housing Ombudsman Scheme and we're committed to its Complaint Handling Code which forms part of our obligations to be a member of the scheme. The code sets out the requirements to support Aster to resolve complaints effectively and fairly and is a guide for customers, setting out what they can expect when they make a complaint.

Each year we must complete a self-assessment against our complaints process to ensure it follows the code, providing evidence to support the statements made. Below is the latest self-assessment which will be reviewed throughout the year.

## 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	Aster follows the Housing Ombudsman's definition of a complaint. This is detailed at - <ul style="list-style-type: none"> <li>• Paragraph 2.3 in the complaints policy</li> <li>• Paragraph 1.3 in the complaints procedure.</li> <li>• The summary of the procedure on the complaint page on Aster's web site also refers to this definition.</li> </ul>
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Use of word 'complaint' - this is detailed in <ul style="list-style-type: none"> <li>• Paragraph 1.3 in the complaints procedure</li> <li>• The summary of the procedure on the complaint page on Aster's web site</li> <li>• Recording a complaint via a representative is covered in paragraph 2.10 of complaints policy</li> <li>• A dedicated procedure in place for managing enquiries from elected representatives</li> </ul>
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	Service request considerations are covered in paragraph 1.3.1 of the complaints procedure
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Paragraph 2.4 of complaints policy

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.	Yes	The complaints process applies to customers where a service is being provided by Aster or where an application is being made for a tenancy with Aster. Circumstances where a complaint will not be considered are covered in the - <ul style="list-style-type: none"> <li>• Complaints policy at paragraphs 1.2, 1.3, 2.3, 2.4, 1.16 and 2.17</li> <li>• Complaints procedure at paragraph 1.3.1</li> <li>• The summary of the procedure on the complaint page on Aster’s web site</li> </ul>
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	This is the role of the Complaints Officers sitting within Aster’s centralised complaints team

### 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	This is referenced in the complaints policy paragraph 2.3. Close liaison and training days take place between the complaints team and the contact centre to ensure a consistent approach. Service request considerations are covered in paragraph 1.3.1 of the complaints procedure
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	Customers are surveyed both during the process ‘how are we doing?’ and at the end of the process ‘How did we do?’ This survey information is assessed by the Complaints Officer and direct contact made with the customer as required.

## 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	Multiple routes are available to make a complaint - detailed in paragraph 1.3 of the complaints procedure. In addition to this, customers can leave feedback via the My Aster Portal which is assessed by the contact centre within the requirements of the complaints policy and procedure. Social media enquiries are managed via the communication team and assessed by the contact centre.
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	The complaints policy is available to view on Aster's complaints Web page and can be downloaded. Written copies are supplied as requested.
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	Aster's complaints Web page contains full guidance on how to raise a complaint together with a template to be able to record a complaint. On submission the customer receives a summary of their complaint which is sent direct to the complaints team for assessment.  The complaints process and policy are easily found under the 'Contact us' section of the Web site and can also be reached by the search facility taking the customer directly to the complaint page.
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	Aster complies with the equality Act 2010 and has a Diversity and Inclusion policy. Reference is made to accessibility in our Customer Principals and the Customer Service Promise. Diversity and Inclusion e-Learning is a mandatory learning module for all Aster staff.  The complaints policy at paragraph 2.11 advises - <i>we will ensure we are approachable and helpful throughout the complaints procedure. We will always ensure that we carry out any reasonable adjustments to the complaints process for residents that require us to do so.</i>

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	There is a dedicated complaints page on Aster's web site linked to the 'Contact us' section which can also be found via the search function, together with a complaint service promise. This publicises the complaint policy, process, Complaint Handling Code and role of the Housing Ombudsman. A communication plan is in place, supported by the communications team, to ensure the complaints procedure, the role of the Housing Ombudsman, learning from complaints and Aster's complaint performance is published both internally to staff and externally to customers.
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	The role of the Ombudsman and links to the Ombudsman's website can be located on Aster's complaints page. A communication plan is also in place - see code section 2.6
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.	Yes	Aster's complaint page on the website explains the role of the Housing Ombudsman and contains a link to both the Ombudsman's website and the Complaint Handling Code. When a formal complaint is logged customers are sent an information leaflet informing them of the Housing Ombudsman's Service and contact details. The right to refer a complaint and the contact details of the Housing Ombudsman Service are included in both stage 1 and 2 of Aster's complaints process and also in the Designated Complaints Panel (DCP) outcome letter.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	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.	Yes	Social Media enquiries are managed via Aster's communications team and are sent to the Contact Centre for assessment and progression.

### 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	Aster has a centralised and dedicated complaints team with regional aligned Complaints Officers. Their role is to receive, assess, allocate, monitor and provide support for all complaints ensuring they are dealt with in line with the complaints procedure. The complaint investigation itself is service led with nominated 'complaint investigating managers'. The Complaints Officers work to dedicated regions with the investigating case managers supporting them and customers through the complaints process. Scrutiny takes place by Operational Leadership Teams and Involved Customer Groups to provide assurance to the Executive Board.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The service areas take the lead in complaint investigation and part of the Complaints Officers role is to ensure there are no conflicts of interest. The Complaints Officers provide support and oversight of the complaint and review all stage 1 and stage 2 responses, with the investigating case, manager before they are sent to the customer. The investigating case managers are trained in complaint management. Aster has in place a framework for all leaders to help them develop their skills, complaint management and the promotion of a positive complaints culture forms a part of this framework.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <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>	Yes	<p>Investigating case managers have authority and autonomy to act to resolve complaints and have access to Heads of Service or equivalent for support.</p> <p>Aster's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout. This is detailed in the complaints policy, paragraph 2.9 of the policy refers to training.</p>

### 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>Full audit trails are kept of contact and decisions made by the complaints team.</p> <p>All complaints are acknowledged - the target to acknowledge is currently 2 working days (Paragraph 2.20 Complaints policy).</p> <p>Complaints are dealt with either via the Fast-Track Process (Paragraph 2.13) or the Formal process (Paragraph 2.21- 2.23 of the complaints policy).</p> <p>The complaints team maintain oversight of all complaints received to ensure consistent application of the policy and procedure.</p>

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	This is included in the acknowledgement of Fast track complaints and complaints at both stage 1 and 2. If any aspects of the complaint are unclear the Complaints Officer will make contact with the customer.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All complaint investigations are conducted in an open, no blame and transparent way. This approach is detailed in paragraphs 2.1, 2.5 and 2.8 of the complaints policy and is supported by the complaints team.
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>Investigating case managers conduct the investigation within Aster’s overall approach to complaint management with the emphasises on a no blame culture, trying to resolve complaints and ensuring everyone is treated fairly and honestly throughout. This is detailed in the complaints policy at paragraph 2.9. The template responses and oversight/support of the Complaints Officers supports this approach.</p> <p>Complaints Officers provide overall oversight of the quality of investigations, compliance with policy and procedure with appropriate challenge/intervention/support for each complaint investigation when required.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Investigating case managers and the Complaints officers agree with the customer their preferred way to communicate, and if outside of complaint handling code timescales the frequency of contact.
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	Customers (and if applicable staff) are contacted by the investigating case manager (and where required by the complaints officers) at both stage 1 and 2 as part of the investigation process as detailed in the complaints procedure at paragraphs 1.4.2 and 1.4.6. The Complaints Officers coordinate escalation to stage 2 and ascertain why a customer remains dissatisfied and the resolution they are seeking. This ensures all parties have an opportunity to explain, be heard and set out their position.

<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	<b>Yes</b>	The timescale to respond within 10 days is included in complaints procedure at paragraph 1.4.3 and is included in the stage 1 response. The procedure is available to view online on the Aster complaints web page.
<b>4.14</b>	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.	<b>Yes</b>	The escalation process is detailed in the complaints policy in paragraphs 2.19 and 2.21 including the reasons for declining a complaint.

<b>4.15</b>	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.	<b>Yes</b>	The complaints team keep a record of all correspondence and associated documents during a formal complaint investigation - paragraph 1.4 of Complaints procedure. The complaints process is managed by the complaints team via a central contact management workflow process.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	<b>Yes</b>	The Unreasonable Complainers Guidance is an appendix (A) of the complaints Procedure. This is also referred to in the complaints policy - paragraph 2.14

### 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>4.3</b>	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	<b>Yes</b>	The complaints team provide a central resource for Aster assessing, classifying and where needed clarifying the nature of a complaints and the desired outcome, supporting the management of customers expectations where required.

<b>4.4</b>	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.	<b>Yes</b>	Part of the assessment and classification process is consideration of achieving a resolution as early as possible and any immediate actions required (Paragraph 1.3.2 of complaints procedure)
<b>4.5</b>	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.	<b>Yes</b>	Paragraph 2.10 of complaints policy refers to representatives supporting customers
<b>4.8</b>	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.	<b>Yes</b>	This is included in the complaint response

<b>4.9</b>	Communication with the resident should not generally identify individual members of staff or contractors.	<b>Yes</b>	Unless known to customer generally these details are not divulged
<b>4.10</b>	Landlords should keep residents regularly updated about the progress of the investigation.	<b>Yes</b>	This is the role of both the investigating case manager and the regional Complaints Officer overseeing complaint
<b>4.16</b>	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.	<b>Yes</b>	An online survey is completed for all formal complaints. Customers are surveyed twice – when complaint is live 'How are we doing' - to ensure it is progressing with feedback direct to the complaints officers and when the complaint is concluded 'How did we do' Feedback is assessed to analyse any trends or areas of concern
<b>4.17</b>	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	<b>Yes</b>	Aster's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout. The value of being able to learn from complaints and learning from the dedicated Learning Complaint Group will be shared throughout the organisation and with customers.
<b>4.19</b>	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.	<b>Yes</b>	The Unreasonable Behaviour Guidance provides the steps and considerations to be taken

## 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	The complaints policy and procedure clearly sets out the timescales for responses – complaints policy Paragraph 2.21 and complaints procedure paragraphs 1.4.2 – 1.4.6. Customers are notified if an extension is needed and the proposed response time. (10 working days) by the Complaints officers. Compliance with this requirement is monitored by the leadership teams and involved customers as an operational performance indicator
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	Responses are sent with the proposed actions and undertakings within the Complaint Handling Code response timescales. Completion of these actions are monitored within the complaints team to ensure completion.

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	Response template covers the requirements for the response to support Investigating Case Managers. All responses are overseen by the Complaints Officers
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>	Yes	The response template covers the requirements for the response to customers. All responses are overseen by the Complaints Officers

## 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	This is covered in paragraph 2.19 of the complaints policy
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the	Yes	The Complaints Officers are responsible for the escalation process to stage 2, liaising with the customer and the investigating case manager. The stage 2 acknowledgment letter to the customer sets

	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.		out both the reason for dissatisfaction and the outcomes being sought
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	This is detailed in Paragraph 2.21 of Complaints Policy and Paragraph 1.4.4 of the Complaints procedure.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Paragraph 1.4.4 of the Complaints Procedure
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.	Yes	The complaints policy and procedure clearly sets out the timescales for responses – policy Paragraphs 2.21 and procedure -paragraphs 1.4.2 – 1.4.6. Customers are notified if an extension is needed and the proposed response time (10 working days) by the Complaints Officers.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <b>and</b> <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</li> </ul>	Yes	All elements are contained within stage 2 template letter and monitored/oversight by the Complaints Officers  Aster does not have a third stage

	escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.		
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### Stage 3

Code section	Code requirement	Comply: Yes/No	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.	Not Applicable	Aster has a 2 stage complaints process

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>	Not Applicable	Aster has a 2 stage complaints process
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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	Paragraph 1.4.5 of the complaints procedure refers to this point
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	Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details - paragraph 1.4.5 of the complaints procedure
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	This forms part of investigative process.
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.	Yes	The Complaints Officers and case managers will consider any new information during an investigation to consider if this can be incorporated into the response at the current stage of the investigation, or if a new complaint should be logged consulting with and updating the customer

## Stage 2

Code section	Code requirement	Comply: Yes/No	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.	Yes	Paragraph 1.4.5 of the complaints procedure refers to this point
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	Yes	Paragraph 1.4.5 of the Complaints procedure. Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details.

## 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><u>within 20 working days</u></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.	Not Applicable	Aster has a 2 stage complaints process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact	Not Applicable	Aster has a 2 stage complaints process

	details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.		
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## 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	This is embedded and forms the core part of the investigation process both in training and is covered in response the letter templates and overseen by the Complaints Officers
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	This is embedded and forms the core part of the investigation process, both in training and is covered in the response letter templates and overseen by the Complaints officers
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	This is included in the response templates. The complaints team and service areas monitor proposed remedies to completion.
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	The compensation policy and the sporting guidance document covers all these aspects in considering and awarding compensation payments. Oversight and reporting of compensation payments made is conducted by the Complaints Manager

## 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	For each formal complaint a learning record is completed to capture learning. Investigating case managers are requested to consider how service delivery can be improved as whole, not just restricted to their service area. The Complaint Learning Group review and report on learning across Aster.
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	Assessment of complaints are made by the Complaints Officers to ensure they are dealt with via the correct process and provide advice and support to case managers to seek legal advice where required.

## 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	Performance, trends and learning is included in the customers annual report is a dedicated section for complaints. An annual complaints report is presented to the Customer Overview Group, responsible for oversight of the implementation of the complaints policy and to the Customer and Community Network providing assurance for the overlap boards. Quarterly complaint reports with learning, trends and performance are presented involved customer groups, the Customer Service Leadership Team and the Customer Experience Panel. A wider communication plan is in place to enable coordinated communication and updates for staff and colleagues to report performance trends and learning.

**Best practice 'should' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	<p>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.</p>	Yes	<p>There are clear lines of responsibility (a delegation matrix) detailing reporting lines, accountability and responsibility to monitor Aster's performance and provide assurance. Senior Operations Teams and the Customer Experience Panel, report and provide assurance to the Executive Board, the Customer and Community Network and the Overlap Boards. Involved customer groups monitor performance and the Customer and Community Network assess an annual complaint report for assurance to the Overlap Boards.</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>All of these aspects are included in the quarterly reports to the leadership teams and involved customer groups. Scrutiny of performance/assurance and actions required are monitored through this process.</p> <p>All complaint outcomes are referred to the Customer Services Operations Director, included in the quarterly report for the information of the Customer Service Leadership Team (CSLT) and all actions are tracked and monitored by the Complaints Manager. This also falls within the remit of the Complaints Learning Group to monitor implementation.</p> <p>Quarterly complaint reports with learning, trends and performance are presented to the Customer Service Leadership Team and the Customer Experience Panel.</p> <p>An annual complaints report is presented to the Customer Overview Group, responsible for oversight of the implementation of the complaints policy and to the Customer and Community Network providing assurance for the overlap boards.</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.	<b>Yes</b>	Aster has a dedicated Complaints Learning Group. The Group is responsible for reviewing and challenging complaint learning identified by complaint investigating managers, monitoring Housing Ombudsman determinations, orders and recommendations, and driving improvements in assessing and implementing learning across Aster. The group reports to the Customer Services Leadership Team
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>	<b>No</b>	Work is currently being conducted to develop a standard objective in relation to complaint handling for staff via the Customer Service Leadership Team A leadership framework has also been developed and includes a leaders role in dealing with complaints. The Aster Way sets out our values and the behaviours we expect from colleagues.

## 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.	<b>Yes</b>	An Annual self-assessment is conducted against the code and is used an opportunity to provide continuing assurance against the code requirements and any implement any changes required. Involved Customers via the Designated Complaints Panel form part of the assessment process.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	<b>Yes</b>	Included in the complaints policy - paragraph 3.4

<p><b>8.3</b></p>	<p>Following each self-assessment, a landlord must:</p> <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>	<p><b>Yes</b></p>	<p>Following each self-assessment this is reported to the Customer Service Leadership Team, The Customer Experience Panel and the Customer and Community Network providing assurance for the Overlap Boards.</p> <p>The assessment is published on Aster Web site and a link to the assessment will be included in future customer annual reports.</p>
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