# Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord’s governing body at least annually.

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

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

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

Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>

Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>

# Section 1: Definition of a complaint

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 1.2 | A complaint must be defined as:  *‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’* | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This definition is stated in the Complaints and Compliments Policy (4.0).  The Policy is available online or upon request.  Customers are offered a copy of this policy at both stages within the complaints process. |
| 1.3 | A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Colleagues are trained to recognise the difference between a service request, survey feedback and a formal complaint and take appropriate steps to resolve the issue for customers as early as possible’. Colleagues will signpost customers on how to make a complaint, if they air their dissatisfaction, should they wish to do so.  This is stated in the Complaints and Compliments Policy (5.0 and 6.0).  The Policy is available online or upon request.  Customers are offered a copy of this policy at both stages within the complaints process. |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | Stated within the Complaints and Compliments Policy (5.0). | The Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Customers are offered a copy of this policy at both stages within the complaints process.  The Customer Voice Team handle all formal complaints that Gentoo receive. Colleagues can own a customer’s problem and fix it promptly and informally, we can prevent it becoming a formal complaint and restore the customer’s satisfaction with Gentoo.  We call this Own it Fix it.  Own It, Fix Its are recorded on the Group’s CRM system to enable monitoring and recording. |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains. | Yes | Stated within the Complaints and Compliments Policy (6.0) | The Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Customers are offered a copy of this policy at both stages within the complaints process.  The Customer Voice Team handle all formal complaints that Gentoo receive. Colleagues can own a customer’s problem and fix it promptly and informally, we can prevent it becoming a formal complaint and restore the customer’s satisfaction with Gentoo.  We call this Own it Fix it.  Own It, Fix Its are recorded on the Group’s CRM system to enable monitoring and recording. |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes | Customers can respond via survey on Your Gentoo Voice website | Colleagues are trained to recognise the difference between a service request, survey feedback and a formal complaint and take appropriate steps to resolve the issue for customers as early as possible’. Colleagues will signpost customers on how to make a complaint, if they air their dissatisfaction, should they wish to do so.  Your Gentoo Voice is the online engagement platform where regular feedback is captured via surveys. Within the website, information is provided on how to make a complaint. |

# Section 2: Exclusions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 2.1 | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Reasons that complaints will not be accepted are detailed in the Exclusions section of the Complaints and Compliments Policy (10.2).  Customers are offered a copy of this policy at both stages within the complaints process.  If a complaint is not accepted an explanation is given to the customer. This is detailed in the Complaints and Compliments Policy (10.2). |
| 2.2 | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:   * The issue giving rise to the complaint occurred over twelve months ago. * Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. * Matters that have previously been considered under the complaints policy. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Reasons that complaints will not be accepted are detailed in the Exclusions section of the Complaints and Compliments Policy (10.2).  Customers are offered a copy of this policy at both stages within the complaints process. |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is stated in the Complaints and Compliments Policy (10.1) |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Reasons that complaints will not be accepted are detailed in the Exclusions section of the Complaints and Compliments Policy (10.2).  If a complaint is not accepted an explanation is given to the customer and Ombudsman details shared. This is detailed in the Complaints and Compliments Policy (10.2). |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Each complaint is treated on an individual basis. This is detailed in the Complaints and Compliments Policy (4.0) |

# Section 3: Accessibility and Awareness

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 3.1 | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Accessibility statement available at: https://www.gentoogroup.com/accessibility-statement/ | Gentoo accept complaints across a range of channels including telephone, email, web form, social media and in writing.  This is stated in the Complaints and Compliments Policy (5.0).  These channels are advertised to customers in a variety of ways including on the Gentoo website, via social media and in written correspondence.  Gentoo is committed to the principles of diversity and inclusion, I.e., fairness, accessibility and transparency. Gentoo values diversity and is committed to promoting the equality of opportunity to ensure all customers are treated fairly. Gentoo will seek to identify customers who are vulnerable and account for their specific needs when handling their complaint by making appropriate and reasonable adjustments.  <https://www.gentoogroup.com/equality-diversity-and-inclusion/> |
| 3.2 | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Detailed in the Complaints and Compliments Policy (6)  All Gentoo colleagues will undertake complaints awareness training. This details the role of the Customer Voice team and the Housing Ombudsman as well as the Complaint Handling Code.  All Gentoo customer-facing colleagues will undertake customer care / complaints handling training in 2024. complaints handling training.  Colleague learning labs create awareness and understanding of the Customer Voice Team. |
| 3.3 | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain. | Yes | Customer friendly complaints leaflet included with Sign up pack | The customer friendly complaints leaflet is included in customer sign up packs for customers. |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Accessibility statement available at: https://www.gentoogroup.com/accessibility-statement/ | The Complaints and Compliments Policy is clearly signposted on the Gentoo website.  The two-stage process and timescales are detailed in the Policy.  The two-stage process and the timescales are also detailed on the web page, the video-explainer, and within the Customer Voice team correspondence with customers.  A customer-friendly version of the Complaints and Compliments Policy was produced in 2023 as a recommendation of a customer-led scrutiny review.  Additional easy-read documentation will be produced in 2024. |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Complaints and Compliments Policy has been amended to reflect this and is available on Gentoo website. |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | A complaint that is submitted via a third party will still be handled in line with this policy however we require permission from the customer to discuss their complaint with a third party. A complainant may choose to have a suitable representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with Gentoo. This is detailed in the Complaints and Compliments Policy (5.0) |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Customers may access The Housing Ombudsman Service for advice at any point throughout their complaint, not only when the internal complaints process is exhausted.  Customers are offered a copy of this policy at both stages within their complaint. |

# Section 4: Complaint Handling Staff

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the ‘complaints officer’. This role may be in addition to other duties. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | The Customer Voice Team was set up in 2021 to manage all formal complaints for Gentoo. This ensures a coordinated, consistent and impartial approach to complaint resolution. However, all colleagues are responsible for recognising and taking accountability for resolving an initial expression of dissatisfaction. Detailed in the Complaints and Compliment Policy (6.0) |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly. | Yes | The Customer Voice Team was set up in 2021 to manage all formal complaints for Gentoo. This ensures a coordinated, consistent and impartial approach to complaint resolution. |  |
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively | Yes | Colleague training records | All Gentoo colleagues will undertake complaints awareness training. This details the role of the Customer Voice team and the Housing Ombudsman as well as the Complaint Handling Code.  All Gentoo customer-facing colleagues will undertake customer care / complaints handling training in 2024.  complaints handling training.    Colleague learning labs create awareness and understanding of the Customer Voice Team.  The Gentoo-wide ‘Move the Dial’ roadshows shared detail of complaints and learnings.  The Customer Voice team undertake specialist training and CPD from external specialist and via the HOS learning portal. |

# Section 5: The Complaint Handling Process

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Customers were involved in the development of Gentoo’s Complaints and Compliments Policy via scrutiny exercises.  A customer-friendly version of the Complaints and Compliments Policy was produced in 2023 as a recommendation of a customer-led scrutiny review. |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Gentoo follows a two-stage formal process as documented in the Complaints and Compliments Policy (9.0). |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Gentoo follows a two-stage formal process as documented in the Complaints and Compliments Policy. |
| 5.4 | Where a landlord’s complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes | Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Communication and Policy to be shared for awareness across Gentoo. Directors and Service Leads to be updated. All third-party suppliers providing customer service on behalf of Gentoo will be written to. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> |  |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Acknowledgement letter template for stage 1 and stage 2 | Detailed in the Complaints and Compliments Policy (9.0) |
| 5.7 | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear. | Yes | Acknowledgement letter template for stage 1 and stage 2 | Detailed in the Complaints and Compliments Policy (9.0) |
| 5.8 | At each stage of the complaints process, complaint handlers must:   1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived conflict of interest; and 4. consider all relevant information and evidence carefully. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | All Gentoo colleagues will undertake complaints awareness training. This details the role of the Customer Voice team and the Housing Ombudsman as well as the Complaint Handling Code.  All Gentoo customer-facing colleagues will undertake customer care / complaints handling training in 2024. complaints handling training.  The Customer Voice team undertake specialist training and CPD from external specialist and via the HOS learning portal.  Customer friendly complaints policy details the actions taken by the customer voice team in a clear and transparent way. |
| 5.9 | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  A mutually agreed resolution date (MARD) is agreed with the customer letter template in place. | If a complaint cannot be agreed within required timescale, a mutually agreed resolution date (MARD) is agreed with the customer.  This is detailed in the Complaints and Compliments Policy (9.0) |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | Yes |  | Systems (Streetwise/Genforce) are updated where appropriate to indicate any reasonable adjustment that may be necessary. |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Reasons that complaints will not be accepted are detailed in the Exclusions section of the Complaints and Compliments Policy (10.2).  If a complaint is not accepted an explanation is given to the customer and Ombudsman details shared. This is detailed in the Complaints and Compliments Policy (10.2). |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | Yes | Full record of the complaint and outcomes at each stage and all correspondence are stored securely on Gentoo’s Streetwise CRM system. | Customer information is stored securely and is used for continuous improvement across Gentoo. |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Yes | The Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Customers are offered a copy of this policy at both stages within the complaints process. |  |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Community Safety and Anti-Social Behaviour Policy is available at <https://www.gentoogroup.com/media/jjxhktgo/community-safety-and-asb-policy-v23.pdf> | A Senior Manager will review unreasonable behaviour exclusions ensuring that the Equality Act 2010 has been considered. The customer will be advised of the decision to decline their complaint for ‘unreasonable behaviour’ in writing, giving clear reasons why the complaint will not be accepted. |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Community Safety and Anti-Social Behaviour Policy is available at <https://www.gentoogroup.com/media/jjxhktgo/community-safety-and-asb-policy-v23.pdf> | A Senior Manager will review unreasonable behaviour exclusions ensuring that the Equality Act 2010 has been considered. The customer will be advised of the decision to decline their complaint for ‘unreasonable behaviour’ in writing, giving clear reasons why the complaint will not be accepted. |

# Section 6: Complaints Stages

Stage 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | The customer voice team triage complaints and consider the complexity of a case in line with company policy |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is detailed in the Complaints and Compliments Policy (9.1). |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is detailed in the Complaints and Compliments Policy (9.1). |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | If a complaint cannot be agreed within required timescale, a mutually agreed resolution date (MARD) is agreed with the customer.  This is detailed in the Complaints and Compliments Policy (9.0) |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is detailed in the Complaints and Compliments Policy (9.0)  This is included in all letter templates. |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes |  | Governance framework introduced from mid-April |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is covered in response letter. |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes | Full record of the complaint and outcomes at each stage and all correspondence are stored securely on Gentoo’s Streetwise CRM system. | Where customers raise additional complaints during an investigation, these will be incorporated into the response if they are relevant, and the response has not been issued. Where the response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.  Gentoo follows a two-stage formal process as documented in the Complaints and Compliments Policy.  (9.0) |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is documented in complaint response letters. |

Stage 2

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 6.10 | If all or part of the complaint is not resolved to the resident’s satisfaction at stage 1, it must be progressed to stage 2 of the landlord’s procedure. Stage 2 is the landlord’s final response. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Complaints are escalated from stage 1 where a customer has provided further information or remains dissatisfied with the stage 1 response.  Gentoo follows a two-stage formal process as documented in the Complaints and Compliments Policy.  (9.0) |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is detailed in the Complaints and Compliments Policy (9.0) |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | Maintaining contact with the customer throughout the process and this is documented on Streetwise system. |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Customer Voice Partners handled complaints at stage 1 whereas Customer Voice Leads or relevant Senior Manager handle stage 2 complaints. | Customer Voice Partners handle stage 1 complaints, Customer Voice Leads handle stage 2 complaints. |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is detailed in the Complaints and Compliments Policy (9.0) |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Any extension is communicated and agreed with the customer and documented on Streetwise system. | If a complaint cannot be agreed within required timescale, a mutually agreed resolution date (MARD) is agreed with the customer.  This is detailed in the Complaints and Compliments Policy (9.0) |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Complaints and Compliments Policy (9.5) has been updated to reflect this. |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes |  | Governance framework introduced from mid-April 2024 |
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/>  Covered in response letter. |  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | This is documented in response letters.  Customer Voice Team have received training on complaint handling and responses. |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | Evidence in response letters detailing the relevant colleague and service areas which have been involved with the case. This is stored on Streetwise system. |  |

# Section 7: Putting things right

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 7.1 | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:   * Apologising; * Acknowledging where things have gone wrong; * Providing an explanation, assistance or reasons; * Taking action if there has been delay; * Reconsidering or changing a decision; * Amending a record or adding a correction or addendum; * Providing a financial remedy; * Changing policies, procedures or practices. | Yes | Evidenced in response letters to customers which are stored on Streetwise system. | This is documented in response letters. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Documented in customer response letters which are stored on Streetwise system. | Housing Ombudsman redress guide is followed. Compensation Policy is currently under review. |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | Documented in response letter which is stored on Streetwise system. | Handled on a case by case basis and documented in response letter. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes |  | The Customer Voice team have received training from external specialist and via the HOS learning portal. |

# Section 8: Putting things right

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:   1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 2. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; 3. any findings of non-compliance with this Code by the Ombudsman; 4. the service improvements made as a result of the learning from complaints; 5. any annual report about the landlord’s performance from the Ombudsman; and 6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes |  | An annual complaints performance and service improvement report for 2023/24 will be presented to Gentoo’s Customer Committee and Board in May 2024.  To be drafted April 2024. |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this. | Yes |  | An annual complaints performance and service improvement report for 2023/24 will be presented to Gentoo’s Customer Committee and Board in May 2024.  The governing body’s response will be published thereafter. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes |  | A self-assessment will be undertaken should there be a significant restructure or change in procedure. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | This will be documented directly to the Ombudsman following any review requested by the Ombudsman. |  |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes |  | The Ombudsman will be informed if Gentoo is unable to comply with the Complaint Handling Code. A timescale for returning to compliance will be provided. |

# Section 9: Scrutiny & oversight: continuous learning and improvement

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Our services are improved by identifying themes and trends in complaint and compliment data, themes and trends are assessed by Senior Management to identify any risks and potential procedure and policy issues, complaints and compliments are used for staff training and development.  Service improvements are communicated to customers on our website, through social media, in our annual report and on our online engagement platform ‘Your Gentoo Voice’.  Learnings from complaints are communicated with operational managers on re-occurring basis.  This is detailed in the Complaints and Compliments Policy dedicated section: Learning from Complaints and Compliments (17.0) |
| 9.2 | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes | Customer friendly version of Gentoo’s Complaints and Compliments Policy is available online at <https://www.gentoogroup.com/contact/complaints-procedure/>  Full detailed policy is available at: <https://www.gentoogroup.com/documents-and-policies/> | Complaint insight is shared with The Customer Committee at least quarterly.  Customers who have complained are asked to offer us feedback on the handling of their complaint to ensure The Customer Voice Team are operating effectively.  This is detailed in the Complaints and Compliments Policy dedicated section: Learning from Complaints and Compliments (17.0) |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents’ panels, staff and relevant committees. | Yes |  | Complaint insight is shared with The Customer Committee at least quarterly.  Customers who have complained are asked to offer us feedback on the handling of their complaint to ensure The Customer Voice Team are operating effectively.  Service improvements are communicated to customers on our website, through social media, in our annual report and on our online engagement platform ‘Your Gentoo Voice’.  This is detailed in the Complaints and Compliments Policy dedicated section: Learning from Complaints and Compliments (17.0) |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Yes | <https://www.gentoogroup.com/governance/our-board-members-and-customer-committee/> | The Member Responsible for Complaints was appointed at the March 2024 Board meeting.  The MRC is also the Chair of the Group’s People Committee. |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (‘the MRC’). | Yes | <https://www.gentoogroup.com/governance/our-board-members-and-customer-committee/> | The Member Responsible for Complaints was appointed at the March 2024 Board meeting.  The MRC is also the Chair of the Group’s People Committee. |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord’s complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes |  | The MRC is newly appointed and will receive regular reporting on all suitable information and will be shadowing the Customer Voice Team to gain further insight on complaints handling performance in order to meet the expectations of the role. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:   1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 2. regular reviews of issues and trends arising from complaint handling; 3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and 4. annual complaints performance and service improvement report. | Yes |  | New complaints reporting will be introduced from May 2024 which will be regularly distributed to the MRC and governing body. |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:   1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 3. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes |  | In Q1 a new performance management approach is being launched and will include this objective. |