

The Housing
Ombudsman Complaints
Handling Code
Self-Assessment Form
for Orbit Group

Housing Ombudsman Complaint Handling Code

We are committed to delivering an excellent service for all our customers and fully support the Housing Ombudsman's Complaint Handling Code.

The Code sets out recommendations to increase complaint handling consistency across the sector, ensuring complaints are managed effectively and fairly for all.

It is specifically designed to ensure all residents understand how to make a complaint and what they can and should expect from their landlord when they complain, whilst also encouraging ongoing improvements in landlord service delivery.

Key areas in the Code include:

- Universal definition of a complaint
- Providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service
- The structure of the complaint's procedure and clear time frames for responses
- Ensuring fairness in complaint handling with a resident-focused process
- Taking action to put things right and appropriate remedies
- Creating a positive complaint handling culture through continuous learning and improvement

Orbit's Approach

We want our customers to play a bigger role in helping shape our services and in the decisions that affect their communities.

As an earlier adopter of the National Housing Federation's Together with Tenants, a sector-wide initiative focused on strengthening the relationship between residents and housing association landlords, we fundamentally believe our customers have a right to transparency and to understand how we, as the landlord, are managing their homes and communities for them.

Over the last six months, we have been working in consultation with our customers to develop our complaints handling procedures to better meet our customer's needs, whilst also ensuring alignment with the Ombudsman's Complaint Handling Code.

The result of this is our new Orbit complaint policy, which will be launched at the end of the 2020/2021 financial year. This has been developed through customer workshops and roundtables, along with customer focus groups and research, and is supported by an action plan that will enable us to make improvements and implement change.

Some of the key changes being introduced include:

- Increased training and e-learning for Orbit colleagues across the business to support understanding of the role we all play in delivering our customers an excellent service
- Additional training in complaint handling
- Re-introduction of complaint resolution timescale targets (previously removed in response to our customers request that complaints remain open until all works are completed)
- Recording of reasons for refusal of complaints and the number of complaints refused

Over the next 12-months we will be reporting our progress monthly to our Tenant Working Group in addition to six-monthly and annual performance reviews. This is in addition to our existing Group Customer Board performance updates and our annual customer report.

Alongside the development of our new complaints process, we have completed our self-assessment form in consultation with our customers, ensuring the self-assessment supports their views and that they, in turn, support the actions proposed.

Compliance with the Complaint Handling Code

| 1 | Definition of a complaint | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | <p>Does the complaints process use the following definition of a complaint?</p> <p>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.</p> | | ✓ | <p>The definition included our current complaints policy is the same in sentiment and practice, but not in wording.</p> <p>The Housing Ombudsman Service definition set out here is included in our revised Complaints Policy, which is currently going through the approval process for adoption in March 2021.</p> | Yes | <p>The inclusion of the Housing Ombudsman Service complaint definition is included within the new policy currently going through the approval process. This will be launched to the business in March 2021.</p> | ✓ |
| | <p>Does the policy have exclusions where a complaint will not be considered?</p> | ✓ | | <p>The current policy includes a range of exclusions that clearly explain what will not be considered as a complaint. Examples are included to help customers understand what sits outside our remit.</p> | N/A | N/A | ✓ |
| | <p>Are these exclusions reasonable and fair to residents? Evidence relied upon</p> | ✓ | | <p>The exceptions included within the policy have been reviewed by customers in 2019 and again in 2020 and were felt to be appropriate and fair. The exclusions themselves and our application of them, have not been challenged by the HOS or by elected members.</p> | Yes | <p>In 2021 we will be introducing greater scrutiny arrangements with our engaged customers to ensure we are monitoring the impact of our new Complaints policy. This will include the type and volume of exceptions.</p> | ✓ |

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| 2 | Accessibility | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | Are multiple accessibility routes available for residents to make a complaint? | ✓ | | <p>We accept and have seen complaints from customers through the following routes:</p> <ul style="list-style-type: none"> • Telephone • Letter • Email • Social Media • Referral from other business areas • Elected representatives • Family members • Advocacy agencies <p>We support accessibility further with translation and interpretation assistance for our customers.</p> | N/A | N/A | ✓ |
| | Is the complaints policy and procedure available online? | ✓ | | Our Complaints policy is available on the Orbit Customer website on both the Complaints page and in the Publications section. We also have a further document that explains the high-level procedure that our complaints investigations follow included online. | Yes | We are launching a new customer website in early 2021. As part of this, we are improving the accessibility and information on our Complaints process for customers. | ✓ |
| | Do we have a reasonable adjustments policy? | | ✓ | We have an Equality, Diversity and Inclusion (EDI) policy, covers both customers and employees, however, only refers to reasonable adjustments for employees. This has been flagged as an area needing improvement. | Yes | A working group led by Policy and Standards team and aligned to our Equality, Diversity and Inclusion forum is reviewing our broader Equality, Diversity and Inclusion policy in early 2021. | ✓ |
| | Do we regularly advise residents about our complaints process? | | ✓ | <p>We talk our customers through our complaints process upon receipt of a complaint. Our Customer Relations Team also discuss the process with the customer once a complaint has reached the team. It is also included within our customer website.</p> <p>Moving forward, we plan to proactively promote our complaints process with customers at relevant times and across a range of channels.</p> | Yes | <p>We are improving the information in our chatbot function and on our website.</p> <p>To support the launch of our new Complaints Policy we are also developing a new complaints leaflet for customers.</p> <p>In addition, we are reviewing all customer communications to determine which other channels are suitable for further communicating information on our complaints process.</p> | ✓ |

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| 3 | Complaints team and process | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | Is there a complaint officer or equivalent in post? | ✓ | | We have a Customer Relations Account Manager within our Customer Relations Team. This role aligns to the Complaints Officer described within the Housing Ombudsman's Code. | N/A | N/A | ✓ |
| | Does the complaint officer have autonomy to resolve complaints? | ✓ | | Yes, the Customer Relations Team is expected to manage the end-to-end resolution of complaints from receipt and logging, to investigation and customer updates, and through to resolution. The team has the autonomy to work with all business areas to resolve customer complaints. | N/A | N/A | ✓ |
| | Does the complaint officer have authority to compel engagement from other departments to resolve disputes? | ✓ | | Yes, the Customer Relations Team has full access to all areas of the business to resolve complaints, from front line teams to senior managers and the Executive Teams. Our Customer Relations Team also liaise directly with our partners and contractors where necessary to resolve a complaint. | Yes | The new approach to complaint management will include introducing clearer internal service level agreements and service standards to ensure faster responses. | ✓ |
| | If there is a third stage to the complaints procedure are residents involved in the decision making? | - | - | This is not applicable – we have 2 stage complaints process. | N/A | N/A | ✓ |
| | Is any third stage optional for residents? | | ✓ | There is no third stage to our complaints process. | N/A | N/A | ✓ |
| | Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service? | ✓ | | Yes, the response to our Stage 2 review element of the complaints process clearly includes the customers' right to raise their issue with the Housing Ombudsman and we include the contact details of the Housing Ombudsman within our customer communications. | N/A | N/A | ✓ |
| | Do we keep a record of complaint correspondence including correspondence from the resident? | ✓ | | Yes, as part of our approach to managing complaints, all correspondence and information is logged and recorded within our IT systems against each complaint case. Our current policies and procedures set out clear expectations and standards for retaining all documentation relating to a complaint and this is regularly audited as part of our quality assurance processes. | Yes | We are exploring options to utilise our Electronic Document Management system more effectively to store documentation and evidence gathered and produced during the resolution of a complaint. | ✓ |
| | At what stage are most complaints resolved? | | | As part of our formal complaint's procedure, the resolution of complaints from April 2020 to end of October 2020 are: Stage 1 – 654 (94%) Stage 2 – 42 (6%) | N/A | N/A | ✓ |

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| 4 | Communication | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | Are residents kept informed and updated during the complaints process? | ✓ | | <p>Yes, customers are kept informed throughout the management of a complaint.</p> <p>At the start of a complaint, subject to our being able to call the customer, we agree a contact plan with the customer to understand how they would like to be contacted and updated throughout the complaint process.</p> <p>A quality assurance process was introduced in 2020, which checks both the frequency and quality of the customer updates. As part of this process we are required to contact customers every 3-5 working days throughout the complaints process. Checks are also done to ensure that this information is recorded in our system.</p> | Yes | <p>Feedback from our customers has highlighted how important it is to ensure regular communication throughout the complaint process.</p> <p>We are therefore proposing to further strengthen our quality assurance process to ensure communication happens to the right standard.</p> | ✓ |
| | Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision? | ✓ | | <p>Yes, our existing complaint procedures requires employees to call the customer to discuss and explain the resolution before to closing a complaint.</p> <p>Where this is not possible or we are unable to reach the customer, we attempt to contact the customer three times on three different days. If we fail to reach the customer during this time, we then send a letter outlining our response.</p> | N/A | N/A | ✓ |
| | Are all complaints acknowledged and logged within five days? | | ✓ | <p>Our existing complaints procedure states that complaints must be acknowledged within 3 working days.</p> <p>95% of all complaints were acknowledged within 5 working days in October 2020.</p> | Yes | <p>Weekly performance management plans are in place to monitor this. This also ensures we can quickly identify and address any failing of the process.</p> <p>We are exploring the use of digital technology to support more effective complaint acknowledgment.</p> | ✓ |
| | Are residents advised of how to escalate at the end of each stage? | ✓ | | <p>Yes, at the end of each stage 1 of the complaints procedure we set out the next steps that a customer can take. This includes the right to request a review, and the right to escalate the complaint to the Housing Ombudsman. It also includes details of how to do this.</p> | Yes | <p>An area where we feel that we can improve further is the clarification for customers at the end of the informal stage of complaints. We are exploring how to follow up complaints using digital technology.</p> | ✓ |
| | What proportion of complaints are resolved at stage one? | N/A | N/A | 94% | | | |
| | What proportion of complaints are resolved at stage two? | N/A | N/A | 6% | | | |

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| 4 | Communication | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | <p>What proportion of complaint responses are sent within Code timescales?</p> <ul style="list-style-type: none"> • Stage one Stage one (with extension) • Stage two Stage two (with extension) | N/A | N/A | <p>The data below is taken from our Complaints Performance Reports for 2020 year-to-date.</p> <p>Stage 1: April to October 2020 0 – 10 days – 44.3% 10 – 20 days – 19.1% Over 20 days – 36.3%</p> <p>In agreed timescales / with an agreed extension – 94%</p> <p>Stage 2: April to October 2020 0 – 20 days – 95% Over 20 days – 5% In agreed timescales / with an agreed extension - 95%</p> <p>(Note: As part of our existing policy, customers wanted us to keep complaints open until resolved. This includes keeping complaints open until repair works are completed. More complex repair works often take longer to complete, including major works. As a result, we kept complaint open longer than 20 days)</p> | | | |
| | Where timescales have been extended did we have good reason? | ✓ | | <p>Our current approach to managing complaints has been agreed with customers and is to keep complaints open until issues are fully resolved. If the complaint is more complex and likely to take a while to resolve, we discuss the extension of the complaint with the customer. We are often requested by our customers to keep complaints open until all work is completed.</p> <p>We have put a plan in place to capture the reasons for an extension. This will be operational from 2021 and will help evidence and monitor this effectively.</p> | | | |
| | Where timescales have been extended did we keep the resident informed? | ✓ | | | | | |
| | What proportion of complaints do we resolve to residents' satisfaction | | | We do not currently measure customer satisfaction | Yes | We have identified the benefits of monitoring customer satisfaction with complaint handling both for our customers and to ensure we are working in advance of the outcome of the Social Housing White Paper. | ✓ |

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| 5 | Cooperation with Housing Ombudsman Service | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | Were all requests for evidence responded to within 15 days? | | ✓ | <p>In 2020 we have received 150 early investigation requests. All of these have been responded to within the 15 days set out by the Housing Ombudsman.</p> <p>In 2020 we have received 29 full investigation requests. Three of which were responded to outside the 15-day period set out by the Housing Ombudsman. One was responded to within 18 working days; one was responded to within 20 working days; and another was responded to within 23 working days. The Housing Ombudsman Service was informed on all three occasions.</p> <p>Since the new Housing Ombudsman code came into force in September 2019, we have received 63 requests for information from the Housing Ombudsman. We responded in 15 working days or less on 62 of these. One response fell outside of this timeframe with the Housing Ombudsman responded to within 23 working days.</p> | | | |
| | Where the timescale was extended did, we keep the Ombudsman informed? | | | Yes – the Housing Ombudsman was informed on all instances requiring a time extension. Investigations were only extended due to the complexity of the case and the amount of information required. The Housing Ombudsman understood this. | Yes | We are exploring updating reporting spreadsheets to show working days, as opposed to just days. | ✓ |

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| 6 | Fairness in complaint handling | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | Are residents able to complain via a representative throughout? | ✓ | | Yes – our policies allow customers to have a complaint registered by a representative, whether an elected representative or a family member. We report separately on complaints received through elected members and can demonstrate that this is an actively used route of complaint for our customers. | | | ✓ |
| | If advice was given, was this accurate and easy to understand? | | | <p>This is difficult to give a clear and overall yes and no statement to.</p> <p>Each complaint is managed on its own merits and advice on each individual case will therefore be different.</p> <p>Where we can resolve our customer's issue, we will of course do this. Where the issue falls outside of our area of responsibility, or where there is advice that we can provide to help, we explain this over the phone and confirm this in writing. If referring or signposting customers to other agencies or programmes will help, then we will provide this information to customers.</p> <p>All our responses are audited through our quality assurance programme to ensure they are clear and of the expected standard.</p> | | | ✓ |
| | How many cases did we refuse to escalate? What was the reason for the refusal? | | | We do not currently track this information as it is not recorded within our complaint management system. | Yes | We are adapting our systems to record the number of cases refused so we can report on this moving forward. | ✓ |
| | Did we explain our decision to the resident? | | | We do not currently record this. | Yes | As above. The new procedure will require a written response to be sent to the customer explaining the reason for the decision. | ✓ |
| 7 | Outcomes and remedies | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
| | Where something has gone wrong are we taking appropriate steps to put things right? | ✓ | | <p>We have a clear Compensation Policy and Procedure that sets out how we will cover redress, which is putting the customer back in the position that they should have been in before anything had gone wrong.</p> <p>We also make payments for distress and inconvenience based on the circumstances of the case.</p> <p>On a case-by-case basis we make gestures of goodwill, such as replacing carpets, and have helped customers move properties and completed repair works to put things right.</p> | | | |

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| 8 | Continuous learning and improvement | Yes | No | Comments | Plans in place? | Detail of plans | TWT Approved? |
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| | What improvements have we made as a result of learning from complaints? | | | <p>Since April 2020 we have made several improvements as a direct result of complaints. These have included:</p> <ul style="list-style-type: none"> • Introducing further training for our contractor engineers on suitable behaviour and actions within the home • Beginning the process of introducing additional repair check points to better track repair progress and ensure Customer Safety and Fraud surveys are not sent before repairs are complete • Introducing SMS text notifications for customers in the repairs process • Removing the Repairs Online option from our My Account portal due it not working • Amending our Anti-Social Behaviour procedure to ensure Homeowner Anti-Social Behaviour is managed by our Customer Safety and Fraud team • Fixing broken issues and passing information to contractors when customers chase Repair jobs • Introducing a CCTV policy and procedure • Introducing a Pest Management procedure | Yes | <p>We have been rolling out lessons learned and complaint review sessions across our Top 10 complaint areas. Over the next 6 months, we would like to extend this to further teams across the business.</p> <p>We believe that capturing improvements can be improved also.</p> | ✓ |
| | How do we share these lessons with: a) residents? b) the board/governing body? c) In the Annual Report? | | | We have an Annual Report which is sent to Customers, and a Voice of the Customer Report, which goes to our Customer and Communities Board. | Yes | We would like to provide more information to our customers to improve scrutiny across both the business and how we manage complaints. This is being explored by our Customer Engagement team. | ✓ |
| | Has the Code made a difference to how we respond to complaints? | | | Yes | | | ✓ |
| | What changes have we made? | | | <p>We have:</p> <ul style="list-style-type: none"> • Reintroduced a stronger requirement for complaint handlers to contact customers more frequently during complaints. This is live now and being checked through our quality assurance process. • Introduced a full set of work instructions to sit alongside the high-level complaints' procedure • Introduced a new social media platform which is managed by our Customer Relations team • Introduced post-complaint debrief approach to identify the root-cause of the complaint • Introduced a stronger and clearer escalation process within both Customer Relations and the business where timely complaint responses are not provided from the business and/or contractors <p>Further improvements are planned as part of our complaint process action plan, new policy and procedure. However, these have not yet been implemented and so are not listed here.</p> | | | ✓ |

