

Sapphire Independent Housing Housing Ombudsman Complaint Handling Code Self-assessment

December 2020

In July 2020, the [Housing Ombudsman](#) published a new [Complaint Handling Code](#), which supports landlords to resolve complaints raised by their residents quickly and to use the learning from complaints to drive service improvements. Landlords have been asked to self-assess against the Code and publish the results.

Sapphire is committed to compliance with the Code; the following self-assessment is based on complaints from 2019/20, and our policy as of December 2020, though anecdotal references may refer to complaints in other years.

We started to consult residents regarding our complaints policy earlier in the year and will continue to do so ahead of updates to our self-assessment and policies by 30 June 2021.

Compliance with the Complaint Handling Code				
1	Definition of a complaint	Yes	No	Commentary
	Does the complaints process use the following definition of a complaint? <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>	✓		
	Does the policy have exclusions where a complaint will not be considered?	✓		
	Are these exclusions reasonable and fair to residents? Evidence relied upon	✓		The 'When not to use the complaints procedure' section of the policy contains exclusions used by peers in the sector.
2	Accessibility			
	Are multiple accessibility routes available for residents to make a complaint?	✓		The policy lists six complaint methods, which includes two verbal methods and a complaint via an advocate.
	Is the complaints policy and procedure available online?	✓		
	Do we have a reasonable adjustments policy?		✓	Our complaints policy demonstrates our commitment to reasonable adjustments, and we will create a separate policy..

	Do we regularly advise residents about our complaints process?	✓		Each resident newsletter focusses on complaints, and we have forms and process information in reception areas. We will be more explicit with regard to aforementioned methods in this and our annual report.
3	Complaints team and process			
	Is there a complaint officer or equivalent in post?	✓		Residents can complain via their individual point of contact
	Does the complaint officer have autonomy to resolve complaints?	✓		
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	✓		
	If there is a third stage to the complaints procedure are residents involved in the decision making?		✓	There is a third stage, though residents are not currently involved. We will be considering this in our ongoing complaint policy review.
	Is any third stage optional for residents?		✓	It is not optional presently, though we will consider this in our review.
	Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	✓		
	Do we keep a record of complaint correspondence including correspondence from the resident?	✓		
	At what stage are most complaints resolved?			Stage 1

4	Communication			
	Are residents kept informed and updated during the complaints process?	✓		

	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	✓		This is a culture we are developing, though we wish to formalise this in our policy review.
	Are all complaints acknowledged and logged within five days?	✓		We have a target of 2 working days.
	Are residents advised of how to escalate at the end of each stage?	✓		
	What proportion of complaints are resolved at stage one?			86%
	What proportion of complaints are resolved at stage two?			7%
	<p>What proportion of complaint responses are sent within Code timescales?</p> <p>Stage one Stage one (with extension) Stage two Stage two (with extension)</p>			<p>Sapphire responded to 93% of complaints on time. We will be working on our IT systems to introduce reporting in line with the breakdown.</p>

	Where timescales have been extended did we have good reason?	✓		<p>We will be reviewing how we can use our IT systems to improve how we record this, and whether our 5 working days target is a realistic timescale. We have consulted residents regarding the temporary extension to timescales during the pandemic, and the majority have reported being satisfied.</p> <p>From the complaints that have been reviewed, reasons related to a staff member being absent, and needing more time to investigate.</p>
	Where timescales have been extended did we keep the resident informed?	✓		We have an extension letter template staff are expected to use.
	What proportion of complaints do we resolve to residents' satisfaction			<p>Our systems do not currently monitor this metric, though there were no complaints referred to the Ombudsman.</p> <p>NB: The no maladministration investigation in 19/20 related to a 2018/19 complaint.</p>
5	Cooperation with Housing Ombudsman			
	Were all requests for evidence responded to within 15 days?	✓		
	Where the timescale was extended did we keep the Ombudsman informed?			N/A
6	Fairness in complaint handling			
	Are residents able to complain via a representative throughout?	✓		
	If advice was given, was this accurate and easy to understand?	✓		

	How many cases did we refuse to escalate? What was the reason for the refusal?			<p>Our IT systems do not currently record this metric, so we will be reviewing how this can be improved.</p> <p>We reviewed an example where a resident provided new information that was not contained in the original complaint, and we therefore didn't have the chance to investigate.</p> <p>As a reasonable adjustment, we offered the chance to submit the information and receive a second part to the Stage 1 response.</p>
	Did we explain our decision to the resident?	✓		
7	Outcomes and remedies			
	Where something has gone wrong are we taking appropriate steps to put things right?	✓		
8	Continuous learning and improvement			

	<p>What improvements have we made as a result of learning from complaints?</p>			<ul style="list-style-type: none"> • Refresher training around Mary Gober training, and the importance of being thankful for feedback and apologising for service failure • We rolled out the Ombudsman e-learning to all Housing Management staff • Agreed that all members of the Executive Management Team, including the CEO and irrespective of department, would complete the training too
	<p>How do we share these lessons with:</p> <p>a) residents? b) the board/governing body? c) In the Annual Report?</p>			<p>a) Residents Resident newsletters and 'You said/We did' literature and provided to an external Customer Service Excellence accreditation process, which has been successfully renewed since 2017.</p> <p>b) The Board Board is provided with case studies outlining learning.</p> <p>c) In the Annual Report We highlighted ways to get involved in our annual report. We will provide more about lessons arising directly from complaints.</p>

	Has the Code made a difference to how we respond to complaints?	✓		
	What changes have we made?			<ul style="list-style-type: none"> • Matched the Code's complaint definition • Removed compensation from the list of items that will not be considered via our complaints policy • Introduced an approach to Reasonable Adjustments within the complaints policy • Changes for accuracy