

Mandatory 'must' requirements			
Complaint Code Item	First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance	
Section 1 - Definition of a complaint			
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i></p>	<p>Yes – FCHO Complaints Policy states:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i></p>	None Required
1.3	<p>The resident does not have to use the word 'complaint' for it to be treated as such.</p> <p>A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.</p>	<p>Yes – All expressions of dissatisfaction are logged, even if the word complaint is not used by the customer.</p> <p>Under section 3.3 of FCHO Complaints Policy customers are advised of the following:</p> <p>FCHO will accept complaints from advocates acting on behalf of another customer when written consent is provided and where that customer has a right to complain.</p>	None Required
1.6	<p>... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.</p>	<p>No -FCHO does not currently log service requests, FCHO will develop new process to log service requests this process will also be built on the complaints reporting system. The process will include how and when to escalate to a complaint. All service requests will be monitored and reported within the monthly and quarterly complaints reports.</p>	Action Required: FCHO will develop a new process to log and monitor service requests. Reporting will also be amended to capture numbers and reasons for requests.

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	<p>Yes – FCHO accept all complaints raised by customers, unless it falls into a valid exception as stated in the FCHO’s Complaints Policy:</p> <p>FCHO are unable to accept a complaint if:</p> <ul style="list-style-type: none"> • It relates to a first-time request for a service • Legal proceedings are pending or have started, or where there is a legal solution • It relates to an issue that has occurred due to an Act of God e.g., high winds • It relates to reports about neighbour nuisance and/or antisocial behaviour (this will be dealt with under the Antisocial Behaviour Policy) • It is determined that the demands are aggressive or unreasonably persistent 	None Required
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 – FCHO Complaints Policy state that there may be occasions when FCHO is not able to consider a complaint as stated in complaint code item 1.7 above.	None Required
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 – If FCHO decides not to accept a complaint a full response is provided to the customer setting out the reason(s) the complaint has not been accepted. All letters to customers include their right to take the decision to the Housing Ombudsman.	None Required

Best practice 'should' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	No - FCHO are developing a new process to log service requests this process will also be built on the complaints reporting system. The process will include when and how to escalate to a complaint. All service requests will be monitored and reported within the monthly and quarterly complaint reports.	Action Required: FCHO will develop a new process to log and monitor service requests. Reporting will also be amended to capture number and reasons for requests.
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 – Section 3.3 of FCHO Complaints Policy states: If a customer has expressed dissatisfaction in response to a feedback survey, FCHO will contact them to discuss their feedback in more detail and provide them with a resolution or an explanation of the next steps they can take. If the feedback is anonymous, a record of it will be kept for performance purposes only.	None Required
Mandatory 'must' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
Section 2 - Accessibility and awareness			
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	Yes – FCHO customers can make a complaint via the following routes: Online – by filling in a complaint form By phone – 0161 393 7117 - lines are open from 9am to 5pm, Monday to Friday By post – FCHO Tellus, First Place, 22 Union Street, Oldham, OL1 1BE In person – First Place, 22 Union Street, Oldham, OL1 1BE,	None Required

	feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	current opening hours can be found on the website or via direct message on Facebook or Twitter	
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 – FCHO Complaints Policy is available on the FCHO website in a clear format for all customers. The policy is also available in other formats when requested by customers. How to complain - First Choice Homes Oldham (fcho.co.uk)	None Required
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 – FCHO Complaints Policy and process are detailed on FCHO website. How to complain – First Choice Homes Oldham (fcho.co.uk)	None Required
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.	No – The Complaints Policy has not been reviewed in line with the Equality Act 2010. All colleagues complete mandatory Equality, Diversity and Inclusion online training on a yearly basis.	Action Required: FCHO's will review its Complaints Policy in line with the Equality Act 2010.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman	No – The Complaints Policy, process, and the Housing Ombudsman Code is published on the FCHO website. This information is not published elsewhere as part of other regular correspondence.	Action Required: FCHO will review all correspondence sent to customers to identify if information about

	Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	How to complain - First Choice Homes Oldham (fcho.co.uk)	how to complain and the Ombudsman scheme can be included.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No – Only correspondence relating to complaints provides the customer with information on how to contact the Housing Ombudsman.	Action required: FCHO will review all regular correspondence that is provided to customers to see if details on how to contact the ombudsman can be included.
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- All correspondence relating to a customers complaint provides details on how to contact the Ombudsman.	None Required
Best practice 'should' requirements			
Complaint Code Item		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
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.	No - FCHO does not explain within the Complaints Policy how confidentiality and privacy will be maintained when dealing with complaints received via social media channels.	Action Required: FCHO will amend the Complaints Policy to include how confidentiality and privacy will be maintained when dealing with complaints received via social media channels

Mandatory 'must' requirements			
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Section 3 - Complaint handling personnel			
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 - FCHO have a designated Customer Excellence Team consisting of two Customer Excellence Officers and one Senior Customer Excellence Officer.	None Required
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes – The Customer Excellence Officers are an independent team that work solely on complaint handling and resolution, the team have completed training provided by the Ombudsman, the team have also undertaken customer service and policy training.	None Required
Best practice 'should' requirements			
Complaint Code Item FCHO Policy	First Choice Homes Oldham compliance against the Code	Further action to ensure compliance	
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all 	Yes- The Customer Excellence officers can act sensitively and fairly and have undertaken training relevant to the role. Yes – The Customer Excellence Officers have completed customer service and difficult conversation training. Yes – The Customer Excellence Officers engage with	None Required

	<p>levels to facilitate quick resolution of complaints</p> <ul style="list-style-type: none"> • have the authority and autonomy to act to resolve disputes quickly and fairly. 	<p>Complaints Champions, managers, and Heads of Service from different departments to resolve complaints.</p> <p>Yes – The Customer Excellence Officers have autonomy to resolve all complaints; this also includes requests for gestures of goodwill or compensation up to the value of £150</p>	
Mandatory ‘must ‘requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 4 - Complaint handling principles			
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 within five days of receipt.</p>	<p>Yes - The Customer Excellence Officers maintain contact with customers throughout the complaint, including sending confirmation of acknowledgement and a written response to the complaint.</p> <p>Yes – FCHO’s complaints system provides an audit trail of all contact with customers and is updated with regular progress reports on the complaint.</p> <p>Yes- FCHO have a 2 stage complaints process. Customers are informed that they have the right to escalate their concerns through the complaint’s procedure at any time.</p>	None Required

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.	No – The FCHO acknowledgment letter only sets out the understanding of the complaint and not what outcome the customer is seeking.	Action Required: FCHO will amend its acknowledgment letter to include the outcome the customer is seeking.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes - The Customer Excellence Team is an independent team that works solely on complaint handling and resolution. The team remain impartial when handling customers complaints.	None Required
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes – The Customer Excellence Officers are provided with training to ensure that they are competent in all aspects of complaint handling and sensitive to the needs of customers, this includes accessing training provided by the Housing Ombudsman.	None Required
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of	Yes- The Customer Excellence Officers will contact customers to discuss the complaint in more detail this includes discussing the customers preferred method of contact and the frequency of the contact. Regular updates will be provided via the	None Required

	communication.	customers preferred contact method.	
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes- The Customer Excellence Officers contact the customer via their preferred method of contact at each stage of their complaint, including discussing the outcome with the customer before the complaint is closed. If a complaint is made about colleague behaviour the complaints champion will discuss this with the colleague and ask them to set out their position, they will also have a chance to review the findings before a final decision is issued.	None Required
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes – FCHO Complaints Policy states all escalation timescales for complaints. complaint-policy-march-2021.pdf (fcho.co.uk)	None Required
4.14	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.	Yes – FCHO considers every request to escalate complaints at all stages. Where the request is refused FCHO will provide customers with a full explanation of the decision. No – Reasons for refusal to escalate are not currently listed in the Complaints Policy.	Action required: FCHO will amend its Complaints Policy to list the reasons, for refusal to escalate a complaint and ensure these reasons are the same as the reasons for not accepting a complaint.
4.15	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	Yes – All FCHO complaints are logged on the complaints System and colleagues are required to keep this up to date. All correspondence and evidence is stored within a document store.	None Required

	other parties and any reports or surveys prepared.		
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes – FCHO Unacceptable Behaviour Policy was approved in April 2022. unacceptable-behaviour-policy/	None required
Best practice 'should' requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes – The Customer Excellence Officer contacts the customer on receipt of their complaint to discuss their desired outcome and what can be achieved.	None Required
4.4	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?	Yes – FCHO resolution timescales are 7 working days for stage 1 complaints and 15 working days for stage 2 complaints; FCHO will always review each case individually and look to resolve earlier than this timescale when possible.	None Required
4.5	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.	Yes – Section 3.3 of FCHO Complaints Policy states that: 'FCHO will accept complaints from advocates acting on behalf of another customer when written consent is provided and where that customer has a right to complain' This also applies when complaints have been referred to the Ombudsman and section 3.4 of FCHO Complaints Policy states:	None Required

		<p>'Customers can also ask a "designated person" to refer their complaint to the Housing Ombudsman Service on their behalf. The customer must have exhausted all the stages of FCHO's Complaints Policy; they do not have to wait 8 weeks before taking this approach. A designated person is an MP or Councillor. Details of elected members in Oldham can be found on Oldham Council's website www.oldham.gov.uk.</p>	
4.8	<p>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.</p>	<p>Yes – FCHO sets out clearly the legal responsibilities for both parties. Example where FCHO has duties such as carrying out annual gas servicing and the customer has duties such as access to the property, these legal obligations on both parties would be clearly described as part of any complaint response ensuring both parties are clear on role and responsibility</p>	None Required
4.9	<p>Communication with the resident should not generally identify individual members of staff or contractors.</p>	<p>Yes – FCHO Correspondence with customers does not name individual colleagues or contractors, FCHO will only refer to people by their job title.</p>	None Required
4.10	<p>Landlords should keep residents regularly updated about the progress of the investigation.</p>	<p>Yes - The Customer Excellence Officers maintain contact with the customer throughout their complaint, all interactions are recorded on the complaints system.</p>	None Required
4.16	<p>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.</p>	<p>Yes – Feedback on FCHO Complaints Policy was sought from the Customer Voice panel. FCHO also hold a quarterly Complaints Governance meeting attended by the Head of Contact Centre & Complaints, Head of Governance and 5 Customer Voice Panel representatives, to discuss complaints performance, lessons learned, case studies, policy updates and Ombudsman updates.</p> <p>Feedback surveys are also sent out to customers following the closure of the complaint.</p>	None Required
4.17	<p>Landlords should recognise the impact that being complained</p>	<p>Yes – Full training is provided to all Complaint's Champions, Managers, and senior Managers across the organisation.</p>	None Required

	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	Regular training is also provided to teams across the organisation regarding FCHO's complaints process. Monthly complaint meetings take place with both Heads of Service and Complaints champions where case studies are presented, and discussions take place around where improvements can be made.	
4.19	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.	Yes – 2.5 of FCHO Unacceptable Behaviour Policy state: “We will review how it affects the customer (Including a customer's personal circumstances and any reasonable adjustments)”.	Action Required: FCHO will ensure all colleagues have a greater awareness of the Equality Act 2010 and ensure that there is a robust equality impact assessment regime.
Stage 1			
Complaint Code Item FCHO Policy		First Choice Homes Oldham compliance against the Code	Further action to ensure compliance
Section 5 - Complaint stages			
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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 – FCHO provides customers with a response to their complaint earlier than the Code stipulates. To ensure complaints do not exceed the Code timescales FCHO will add triggers within the complaints system to ensure further compliance. FCHO's Complaints Policy states that “FCHO will respond to a complaint within 7 working days of the complaint being received. If FCHO are unable to provide a response within 7 working days, the Customer Excellence Officer will contact the customer and inform them that an extension is required they will also provide them with a new date the response will be provided. This would not exceed 10 days”.	Action Required: FCHO will implement the following system triggers <ul style="list-style-type: none"> • 7 working days (FCHO timescale) • Within 10 Working Day (Ombudsman timescale) • 10 Days extension to ensure responses do not exceed the Code timescales.

5.5.	<p>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.</p>	<p>Yes – FCHO ‘s response to customers complaints includes the agreed outcome(s) and any timescales for resolution. The complaint will not be closed until all outstanding actions have been resolved and the customer is satisfied with the outcome of the complaint. The customer is contacted regularly to provide updates.</p>	None Required
5.6	<p>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.</p>	<p>Yes – FCHO complaint responses are proofread by the Senior Customer Excellence Officer including quality checks to ensure the response outcome addresses all points raised in the original complaint. Full explanations of all decisions are provided.</p>	None Required
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • details of how to escalate the matter to stage two if the resident is not satisfied with 	<p>Yes -This information is provided in stage 1 complaints correspondence. Letters are structured using the Ombudsman template which ensures all these requirements are covered.</p>	None Required

	the answer		
Stage 2			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
5.9	<p>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.</p> <p>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.</p>	<p>Yes – FCHO Complaints policy states:</p> <p>If FCHO are unable to resolve a complaint to the customer's satisfaction at Stage 1, a customer can ask to escalate their complaint to the next stage, stage 2.</p> <p>The Customer Excellence Officers will also discuss the request to escalate with the customer. If a decision is made to not escalate to Stage 2, they will provide the customer with full reasons for the refusal. This is also followed up in writing confirming their right to contact the Ombudsman.</p>	None Required
5.10	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding 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.</p>	<p>No – This is currently done verbally. The escalation to stage 2 acknowledgment letter sent to the customer does not set out the understanding of outstanding issues.</p>	Action Required: FCHO will review its escalation acknowledgement letter to include the understanding of outstanding actions.
5.11	<p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	<p>Yes – All complaints are initially investigated at stage 1.</p> <p>FCHO Complaints Policy states:</p> <p>If FCHO are unable to resolve a complaint to the customer's satisfaction at the stage 1, a customer can ask to escalate their</p>	None Required

		complaint to the next stage, Stage 2 of our policy.	
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes - FCHO Complaints Policy states: Stage 1 complaints are investigated by our Complaints Champions, Stage 2 complaints are assigned to a senior manager or Head of Service who has not been involved in the original investigation.	None Required
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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 – FCHO provides its customers with a response to their complaint earlier than the Code stipulates. To ensure complaints do not exceed the Code timescales FCHO will add triggers within the complaints system to ensure further compliance. FCHO Complaints Policy states that FCHO will respond to a stage 2 complaint within 15 working days of the complaint being received. If FCHO are unable to provide a response within 15 working days, the Customer Excellence Officer will contact the customer and inform them that an extension is required they will also provide them with a new date the response will be provided. This would not exceed 10 days.	Action Required: FCHO will implement the following system triggers to ensure responses do not exceed the Code timescales. <ul style="list-style-type: none"> • 15 working days (FCHO timescale) • Within 20 working days (Ombudsman timescale) • 10-day extension
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"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding 	Yes -This information is provided all stage 2 complaints correspondence. Letters are structured using the Ombudsman template which ensures all these requirements are covered.	None Required

	<p>actions</p> <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	<p>FCHO do not have a third stage of the Complaint Policy.</p> <p>FCHO stage 2 response letter provides the customer with full contact details including telephone numbers for the Ombudsman.</p>	
Stage 3			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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.	Yes- FCHO have a 2-stage complaint process.	None required
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: the complaint stage <ul style="list-style-type: none"> • the complaint definition 	Yes – FCHO do not have a stage 3	None required

	<ul style="list-style-type: none"> • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 		
Best practice ‘should’ requirements			
Stage 1			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – The Customer Excellence Officer contacts the customer to advise them of the delay in providing a full response and agrees a new date.	None Required
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 – The Housing Ombudsman contact details are provided to customers in all complaint correspondence.	None Required

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- The Customer Excellence Team and the Complaints Champions carry out a full investigation including reviewing historic data and/or documentation.	None Required
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 - If a customer raises additional complaints during the investigation, FCHO incorporate these within the stage 1 response. Where customers raise additional issues following the Stage 1 response being completed a new complaint is logged to ensure these issues are fully investigated.	None Required
Stage 2			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – The Customer Excellence Officer contacts the customer and informs them of any delay in providing a full response. They also inform the customer of the new date the complaint response will be issued.	None Required
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 – The Housing Ombudsman contact details are provided to customers in all complaint correspondence.	None Required

Stage 3			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 <u>within 20 working days</u> 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.	Yes – FCHO do not have a stage 3	None required
5.19	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 – FCHO do not have a stage 3	None required
Mandatory ‘must’ requirements			
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Section 6 – Putting things right			
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 - In all response letters sent to customers FCHO sets out what went wrong and what we intend to do to put things right. FCHO also review all complaints and identify lessons learned. These are reviewed at the monthly complaints meeting and discussed at the quarterly Complaints Governance meeting attended by 5 Customer Voice Panel representatives.	None Required
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 – FCHO Compensation Policy provides a guide to the Customer Excellence Officer and senior managers in identifying when compensation should be offered. The Ombudsman’s compensation guide is also used to decide on a relevant amount. compensation-policy-may-2021.pdf (fcho.co.uk) Any other remedies will be in line with service delivery standards.	None Required
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 – The remedy offered to customers is discussed with them prior to written correspondence being sent out. The correspondence outlines what will happen next and includes timescales for resolution. No complaints are closed until all agreed actions have been resolved.	None Required
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 – FCHO Compensation Policy provides a guide to the Customer Excellence Officer and senior managers for identifying when compensation should be awarded. The Ombudsman’s compensation guide is also used to decide on a relevant amount. compensation-policy-may-2021.pdf (fcho.co.uk)	None Required

Best Practice ‘should’ requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
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 – FCHO record all lessons learned and discuss these at a monthly complaint’s champions meeting. As part of this, system failures or process reviews are considered.	None Required
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 – FCHO provide the customer with a resolution to their complaint and when required consult with the Legal Team for specific advice.	None Required
Mandatory ‘must’ requirements			
Complaint code item		First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
Section 7 – Continuous learning and improvement			
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.	No – FCHO do not report back on wider learning and improvements from complaints within the annual report. FCHO currently report on learning and improvements on complaints to the Customer Voice Panel, Monthly Complaints and Leadership meetings.	Action required: FCHO will include wider learning and improvements within its annual report and on the website.

Best practice 'should' requirements		
Complaint code item	First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance
<p>7.3</p> <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>	<p>No – FCHO do not currently have a member of the Board appointed to have lead responsibility for complaints.</p>	<p>Action required: FCHO will review if a Board member should take lead responsibility for complaints and agree any attendance at the quarterly Complaints Customer Voice and Governance meetings.</p>
<p>7.4</p> <p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of 	<p>No - The Board is currently only provided with information on the number of complaints received.</p>	<p>Action Required: FCHO will review the quarterly performance report to include: categories of complaints, outcomes and learning from complaints</p> <p>It will also be agreed what performance information is provided to Board and the frequency of the reports</p>

	<p>management responses should be tracked to ensure they are delivered to agreed timescales.</p> <ul style="list-style-type: none"> • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	<p>No – FCHO do not currently have a standard objective for all colleagues in relation to complaint handling. The current training is only delivered to Heads of Service and Complaints Champions.</p> <p>FCHO Customer Excellence Officers undertake the complaints training delivered by the Housing Ombudsman this includes the 'How to handle complaints effectively,' The Customer Excellence Team are required to read and understand the CIH professional code of conduct. FCHO have also introduced Behavioural Competencies; these are included as part of objective setting and staff check ins</p>	<p>Action Required –FCHO will implement an online complaints training module; all colleagues will be required to complete the training as part on FCHO induction process.</p>
Mandatory 'must' requirements			

Complaint code item	First Choice Homes Oldham Compliance against the Code	Further action to ensure compliance	
Section 8 - Self-assessment and compliance			
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes – FCHO will carry out an annual self-assessment in April each year as recommended by the Housing Ombudsman.	None Required
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes – If a significant restructure and/or changes to a procedure occur, FCHO will carry out a self-assessment.	None Required
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • 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 • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance. 	<p>Yes – The outcome of the self- assessment will be presented to the FCHO Board.</p> <p>Yes – The outcome of the self-assessment will be published on FCHO website.</p> <p>No – At present the self-assessment is not included within the annual report.</p>	Further Action Required: A link to the self-assessment will be included in the annual report.