

**Self-Assessment Form**

This self-assessment form should be completed by the Complaints Officer and discussed at the landlord’s governing body annually. Evidence should be included to support all statements with additional commentary as necessary. Explanations must also be provided where a mandatory ‘must’ requirement is not met, to set out the rationale for the alternative approach adopted, and why this delivers a better outcome.

| Code Section  | Code requirement  | Comply: Yes/No | Evidence, commentary, and any explanations  |
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| <b>Section 1: Definition of a Complaint – Mandatory ‘must’ requirements</b>     |   |                |   |
| 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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.  | ✓              | The current Guinness policy has adopted (and expanded on) the HOS’s definition.   |
| 1.3   | The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.   | ✓              | A resident does not have to use the word “complaint” for it to be treated as such. However, on occasion, either Guinness employees or residents may not be sure of the position: <ul style="list-style-type: none"> <li>• If, as a Guinness employee you are unclear whether a customer wishes to complain, please ask them to clarify.</li> <li>• If, as a resident, you wish to make a complaint and you are unsure whether your expression of dissatisfaction is being registered and treated as a formal complaint, please clarify that this is what you wish to happen.</li> </ul> |
| 1.6   | If further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.   | ✓              | If a resident expresses dissatisfaction with the Guinness service, Guinness will try to put things right at the earliest possible opportunity, resolving the issue for the resident quickly without it becoming a formal complaint. Guinness record all service-failures to help improve service however, if a resident remains dissatisfied or makes it clear they wish to complain, then the matter will be logged as a stage one complaint. This is outlined in the Guinness complaints policy   |
| 1.7   | Landlord must accept a complaint unless there is a valid reason not to do so.   | ✓              | All complaints are accepted unless this falls within our exclusions, as listed in the Guinness complaints policy.   |
| 1.8   | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.  | ✓              | The Guinness complaints policy clearly outlines the circumstances in which a complaint would not be considered, providing transparency and clarity to residents.  |
| 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.  | ✓              | The Guinness complaints policy states, where it is decided not to consider a complaint, an explanation setting out the reasons why the matter is not suitable for the complaints process will be provided. If the resident is unhappy with this decision, Guinness will refer them to the Housing Ombudsman.  |
| <b>Best Practice ‘should’ requirements</b>                                      |   |                |   |
| 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.  | ✓              | The Guinness complaints policy is, if a resident says they want to complain, Guinness will always record this as a complaint. However, Guinness recognises the difference between a service request, service failure, feedback, and a complaint.  |
| 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.   | ✓              | For all Guinness satisfaction surveys, where a resident has given a low scoring, Guinness will aim to resolve the issue for our customer quickly, there and then. Without the need for this becoming a formal complaint. If a resident remains dissatisfied or makes it clear they wish to complain, then the matter will be logged as a stage one complaint. For complaint surveys completed, where the resident is dissatisfied following a complaint, the resident is given the opportunity to escalate their complaint to stage 2 of the complaints process.                        |
| <b>Section 2: Accessibility &amp; Awareness – Mandatory ‘must’ requirements</b> |   |                |   |
| 2.1   | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | ✓              | Guinness does accept complaints made through different channels, including: <ul style="list-style-type: none"> <li>• Using the online complaint form on our website (available in 33 languages)</li> <li>• By telephone, email, online contact form, or letter (translated into any language)</li> <li>• By contacting us through our presence on social media platforms.</li> <li>• In person.</li> </ul>  |

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| 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.  | ✓ | The Guinness complaints policy is clear and accessible to all residents and explains in detail the full stages and timeframes involved.   |
| 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.  | ✓ | The full complaints process including the complaints policy can be found in two clicks from the home page <a href="https://www.guinnesspartnership.com/contact-us/make-a-complaint/expect-make-complaint/">https://www.guinnesspartnership.com/contact-us/make-a-complaint/expect-make-complaint/</a>   |
| 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.   | ✓ | Guinness will provide additional support to residents if they have difficulty accessing our complaints service, in line with our Reasonable Adjustments Policy. This may include providing information in appropriate alternative formats, text relay, or a home visit. <b>(Appendix A, complaints policy, section 23)</b> all resident policies which include reasonable adjustments are available on our website <a href="https://www.guinnesspartnership.com/for-tenants/-policies-tenant/">https://www.guinnesspartnership.com/for-tenants/-policies-tenant/</a>  |
| 2.6   | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.  | ✓ | Guinness does publish this policy and information about how to make a complaint on its website, the resident magazines ("Your Guinness"), in leaflets and in all written complaint correspondence and other customer communications. This resident includes information about the Housing Ombudsman's Complaint Handling Code.  |
| 2.7   | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.   | ✓ | Guinness does publish full details for the Housing Ombudsman on its website, in every complaint response, within our resident magazines, and more recently have revised our complaints policy to include the details of the Housing Ombudsman   |
| 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.  | ✓ | When Guinness receive any complaint, it will make residents aware of the Housing Ombudsman Service and advise them that they can seek advice from the Housing Ombudsman Service throughout the life of their complaint. This is also included in all written complaint outcome at all stages and outlined within the Guinness complaints policy.  |
| <b>Best Practice 'should' requirements</b>                                      |   |   |   |
| 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.  | ✓ | In each case Guinness will verify the identity of the person making a complaint and their relationship to Guinness. All complaints are managed confidentially and in line with the Data Protection Act 2018.  |
| <b>Section 3: Complaint Handling Personnel – Mandatory 'must' requirements</b>  |   |   |   |
| 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".   | ✓ | Guinness have a Complaints Team to promote a positive complaint handling culture with a dedicated officer assigned to every complaint. The Guinness Executive Director of Customer Services will ensure the Executive Team and Board receive regular information on complaints performance. The annual self-assessment is made available for scrutiny.  |
| 3.2   | The complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.   | ✓ | All complaint handlers complete full induction training in line with the complaint handling code, to act impartially, fairly and effectively when dealing with complaints   |
| <b>Best Practice 'should' requirements</b>                                      |   |   |   |
| 3.3   | Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>   | ✓ | All complaint specialists complete full training on all aspects of complaint handling including The Housing Ombudsman's dispute resolution training. The Guinness Complaints function, alongside all resident facing teams, are undergoing further training programmes over the next 12 months. Including, the HO and HQN learning from complaints and professional training in line with CIH standards.  |
| <b>Section 4: Complaint Handling Principles – Mandatory 'must' requirements</b> |   |   |   |
| 4.1   | 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 procedures within five days of receipt. | ✓ | If a resident tells Guinness they want to complain, Guinness will always record it as a complaint. However, we recognise the difference between a service request, service failure, feedback, and a complaint. If a resident expresses dissatisfaction with the service, Guinness will try to put things right at the earliest possible opportunity. Resolving the issue quickly, without it becoming a formal complaint. Guinness will record all expressions of dissatisfaction to help improve services. If a resident remains dissatisfied or makes it clear they wish to complain, then the matter will be logged as a stage one complaint which will be acknowledged within 2 working days. |

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| 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.  | ✓ | All complaints are acknowledged with clarification from initial conversations about customer requirements and expectations, with a clear understanding of the desired resolution.  |
| 4.6  | A complaint investigation must be conducted in an impartial manner.   | ✓ | All Guinness Complaints Specialists do handle complaints fairly, impartially, objectively, and professionally as outlined within the Guinness Complaints policy, the complaint handling code and in line with the Guinness behaviour standards.  |
| 4.7  | The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul> | ✓ | The Guinness complaint's function operates as an independent team. Each dedicated complaints specialist will review a complaint with an open mind, independently and in confidence, in line with Guinness policy and procedures, legislation, and the Complaint Handling Code. The complaints team will share lessons learnt to colleagues to avoid systemic failings.   |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.   | ✓ | Guinness will ensure that residents are kept regularly updated with the progress of the complaint, even if there is no new information to provide. Guinness may arrange a non-standard frequency and method of communication, if agreed with the customer.   |
| 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"> <li>• set out their position.</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>  | ✓ | Guinness will always explore key facts, review all relevant systems or any recorded conversations and ask open questions. This includes taking any statements, listening to all views and conducting a thorough investigation into every complaint to determine a fair outcome. Where things have gone wrong, Guinness will apologise and put this right. In addition, Guinness will agree an action plan with the resident, who has the opportunity to express their concerns. Guinness will reconsider or change a decision as and when appropriate as set out in our complaints policy. |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.  | ✓ | If the resident is not satisfied with the complaint outcome, they may escalate the complaint to the next stage. Complaints will only be escalated to stage two if it has been responded to a stage one. The resident should request a stage two (review) within 15 working days. Guinness may, in exceptional circumstances, consider a stage two (review) after this time.  |
| 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.   | ✓ | Reasons for refusals to decline and escalate a complaint are now clearly set out within the Guinness complaints policy.  |
| 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 other parties and any reports or surveys prepared.  | ✓ | A full record of the complaint case, together with all corresponding records, are stored centrally within the Guinness Customer Relationship Management System (CRM). They are clearly visible and can be reported on and monitored.   |
| 4.18 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.   | ✓ | Guinness recognise that sometimes residents will be upset, angry, or frustrated. Guinness will seek to continue to engage residents in such circumstances. However, Guinness has a duty of care to staff and contractors and will not tolerate unacceptable behaviour from complainants, or their representatives. This is set out within the Guinness complaint policy.   |

**Best Practice 'should' requirements**

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| 4.3  | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic  | ✓ | All customer facing staff, including Complaints Specialists, are fully trained to manage customer expectations from the outset, setting out clear expectations line with Guinness policy and procedure <b>(Appendix A, complaints policy, section 26)</b>   |
| 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. | ✓ | Guinness aim to resolve all complaints within the timescales set out in the Housing Ombudsman's Complaint Handling Code, minimise any impact to residents which may have been caused by Guinness failings, act appropriately to put things right at the earliest opportunity and apply learnings to avoid further failings.   |
| 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.                                  | ✓ | Guinness will accept complaints from others acting on the resident's behalf, as set out within the Guinness complaints policy. For example, people who are expressly authorised to act on a resident's behalf (e.g. family members) or have been authorised by the resident to act on their behalf (e.g. a Councillor/MP.)  |
| 4.8  | 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.  | ✓ | Guinness clearly sets out, within the complaints policy, that all legal, regulatory, and contractual requirements are considered to meet the requirements of the Housing Ombudsman's Complaint Handling Code, together with obligations in line with the Guinness code of conduct.  |
| 4.9  | Communication with the resident should not generally identify individual members of staff or contractors.  | ✓ | Complaints about the conduct or behaviour of staff or other parties, acting on behalf of Guinness, will be addressed in line with human resources and contract management policies.<br>Complainants will be given relevant information about the outcome of their complaint. However, personal data and employment-related information will not be shared with them, in line with our duty to maintain staff confidentiality and data protection.   |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation.   | ✓ | Guinness will ensure that residents are regularly updated with the progress of the complaint, even if there is no new information to provide. Guinness may arrange a non-standard frequency and method of communication, if agreed with the resident.   |
| 4.16 | 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.  | ✓ | Guinness seeks regular feedback through resident satisfaction surveys around complaint handling. This is to help drive a positive culture, improve the quality of the service, and develop a good relationship with residents. Guinness recognises the importance of resident involvement and ensures that customers, and the Guinness Tenant Scrutiny Panel, are consulted to help improve the service.  |
| 4.17 | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.            | ✓ | All resident facing staff have the appropriate training and support to handle expression of dissatisfaction. They have been trained to the adopt mindset that complaints are an opportunity to learn, improve service delivery and to maintain strong relationships with residents.   |
| 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.  | ✓ | As set out within the Guinness complaints policy, if appropriate, Guinness will discuss a contact management plan which may include restricting the customer to a single point of contact within Guinness. This will not be a complete ban on contacting Guinness. Restrictions placed on a customer's contact will be appropriate to their needs and have regard to the provision of the Equality Act 2010. However, Guinness will continue to seek a resolution where there are serious concerns relating to statutory duties, including for health and safety. |

**Section 5: Complaint Stages – Mandatory ‘must’ requirements**

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| 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.  | ✓ | Guinness aim to resolve all complaints within the timescales set out in the Housing Ombudsman’s Complaint Handling Code and the Guinness Complaints Policy. The pandemic created a repair backlog which impacted our ability to resolve stage one complaints as quickly as usual. Guinness have now made significant improvements to service delivery timescales. At the time of publishing this self-assessment, the average life of a stage one complaint was 8.5 days - in line with the timescales set out by the Housing Ombudsman. Guinness continue to drive continuous improvements to service delivery, to resolve and act on complaints, at the earliest opportunity. |
| 5.5            | A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed.<br>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.   | ✓ | From 1 April 2022 Guinness will no longer keep complaints open until actions are completed. Guinness have measures in place to monitor promised future actions. Guinness will not close a complaint until the complaint investigation has been completed, the decision communicated to the complainant, and, if an action plan is necessary, this has been agreed with the complainant. Guinness may however close the complaint where the complainant does not respond to requests to discuss an action plan. Guinness will ensure that the action plan is monitored, and updates provided to the resident.  |
| 5.6            | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | ✓ | Guinness will provide clear and concise complaint outcomes in writing in line with the Complaint Handling Code and our complaints policy.   |
| 5.8            | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer.</li> </ul> | ✓ | All written outcomes are in line with the complaint handling code and the Guinness complaint policy.  |
| <b>Stage 2</b> |  |   |   |
| 5.9            | If all or part of the complaint is not resolved to the resident’s satisfaction at stage one it must be progressed to stage two of the landlord’s procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident’s right to approach the Ombudsman about its decision.   | ✓ | If the resident is not satisfied with the outcome, they may escalate the complaint to the next stage. Complaints must only be escalated to stage two if it has been responded to at stage one. The resident should request a stage two (review) within 15 working days. Guinness may, in exceptional circumstances, consider a stage two (review) after this time.<br>Guinness may refuse to escalate a complaint for the same reasons the original complaint was refused. These reasons are set out within the Guinness complaints policy.   |
| 5.10           | 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.  | ✓ | All Complaint specialists will seek understanding and clarity from the customer on their reasons to escalate a complaint. This is in line with the Guinness complaints policy and the Complaint Handling Code.  |
| 5.11           | Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.  | ✓ | If the resident is not satisfied with the outcome, they may escalate the complaint to the next stage. Complaints must only be escalated to stage two if it has been responded to a stage one. The resident should request a stage two (review) within 15 working days. Guinness may, in exceptional circumstances, consider a stage two (review) after this time.   |
| 5.12           | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.   | ✓ | If the resident decides to escalate the complaint to stage two it will be reviewed by an independent person within Guinness, who has not previously considered the complaint.   |
| 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.   | ✓ | Guinness aim to resolve all complaints within the timescales set out in the Housing Ombudsman’s Complaint Handling Code and our Complaints Policy. The pandemic created a repair backlog which negatively impacted the time to resolve stage two complaints. Guinness has now made significant service delivery improvements. At the time of publishing this self-assessment, the average life of a stage two complaint was 19.4 days - in line with the timescales set out by the Housing Ombudsman. Guinness continues to drive continuous improvements to service delivery, to resolve and act on complaints at the earliest opportunity.                                    |

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| 5.16           | <p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul> | ✓   | All written outcomes are in line with the complaint handling code and the Guinness complaint policy. Guinness do not have a stage three process |
| <b>Stage 3</b> |   |     |   |
| 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.  | N/A | Guinness do not have a stage three process  |
| 5.20           | <p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>   | N/A | Guinness do not have a stage three process  |

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| <b>Best Practice 'should' requirements – Stage 1</b> |   |   |  |
| 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.   | ✓ | At the time of this self-assessment all stage one complaints requiring additional time to resolve have been extended in line with the code and agreement from both parties.  |
| 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.  | ✓ | For all new complaints, residents are given the opportunity to escalate their complaint to the Housing Ombudsman where an agreement cannot be reached.   |
| 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.  | ✓ | Where the problem is a recurring issue, Guinness will consider older reports as part of the background to the complaint if this helps to resolve the issue for the resident.   |
| 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. | ✓ | Where a resident raises additional complaints during the investigation, these will be incorporated into the response if relevant. The exception to this is where a complaint has already been investigated and a response provided, or if the additional complaints would cause an unreasonable delay. |
| <b>Best Practice 'should' requirements – Stage 2</b> |   |   |  |
| 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.   | ✓ | At the time of this self-assessment all stage two escalations requiring additional time to resolve have been extended in line with the code and agreement from both parties.   |
| 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.  | ✓ | On all new escalated complaints, residents are given the opportunity to escalate their complaint to the Housing Ombudsman, where an agreement cannot be reached.   |

| Best Practice 'should' requirements – Stage 3                                |   |     |   |
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| 5.18   | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.                                 | N/A | Guinness do not have a stage three process  |
| 5.19   | 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.  | N/A | Guinness do not have a stage three process  |
| Section 6: Putting things Right – Mandatory 'must' requirements              |   |     |   |
| 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.  | ✓   | The Complaints and Resolution team complete annual training on the Housing Ombudsman's dispute resolution training. Guinness will always acknowledge where things have gone wrong and how Guinness intend to put things right.  |
| 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.  | ✓   | Any remedies offered will reflect the extent of any failures and the level of detriment caused to the complainant as a result.  |
| 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.   | ✓   | All remedies may include an action plan, agreed with the resident, setting out clear agreements.  |
| 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.   | ✓   | All compensation awards are in line with the Complaint Handling Code and the Housing Ombudsman remedies guidance as per the Guinness compensation policy: <a href="https://www.guinnesspartnership.com/for-tenants/customer-policies-tenant/">https://www.guinnesspartnership.com/for-tenants/customer-policies-tenant/</a>   |
| Best Practice 'should' requirements  |   |     |   |
| 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.  | ✓   | Guinness use learning from complaints to inform service improvements and to drive a positive complaint handling culture. Guinness use Lean methodologies to help us improve, strengthen processes, and to establish great relationships with residents. If one complaint highlights a required change that could benefit all residents, then Guinness will act upon this, including changes in policies and procedures. |
| 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.  | ✓   | Guinness will always endeavour to seek a resolution for residents until a legal claim has been filed with a court. Then Guinness will seek legal advice to help form a resolution.  |
| Section 7: Continuous Learning & Development – Mandatory 'must' requirements |   |     |   |
| 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.  | ✓   | Guinness will publicise annually learnings from complaints and service improvements made. This is evidenced within the Guinness annual report 2021-22 and within the resident magazine. Guinness regularly feedback performance to the Tenant Scrutiny Panel.   |
| Best Practice 'should' requirements  |   |     |   |
| 7.3  | 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.  | ✓   | The Executive Director of Customer Services has lead responsibility for complaints.   |
| 7.4  | As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman</li> </ul> | ✓   | The Executive Director of Customer Services will ensure the Executive Team and Board receive regular information on complaints performance and that the annual self-assessment is made available for scrutiny.  |

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|     | made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.  |   |   |
| 7.5 | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.  | ✓ | All themes and trends from complaints are shared regularly to inform service improvements. Learnings and changes are included within the Guinness annual customer report.   |
| 7.6 | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul> | ✓ | All staff work to a set standard of Guinness behaviours. Adherence is measured and monitored regularly through standard objectives and performance reviews. These objectives include taking responsibility, delivering a great service, providing a 'one' organisation experience, and not blaming others when things go wrong. All staff are required to respond positively to feedback and act upon it, respond quickly when things go wrong and keep promises to customers<br>Customer Service teams working with the complaints function are completing refreshed corporate complaints training, together with individual development plans in line with the guidance set out by the Chartered Institute of Housing. Guinness has Service improvement Managers across all teams who work collaboratively with complaints to help improve processes and apply lessons from complaints. This forms part of the Business plan and Operating plans. |

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| <b>Section 8: Self-Assessment and Compliance – Mandatory 'must' requirements</b> |   |   |   |
| 8.1  | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.   | ✓ | The Guinness self-assessment, evidencing compliance to the Complaint Handling Code, will be published by 30 September 2022 and each year thereafter.                                |
| 8.2  | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.  | ✓ | The Guinness self-assessment against the code is compliant with all recent organisational design changes.   |
| 8.3  | Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance.</li> </ul> | ✓ | This self-assessment has been reported to our Executive Director of Customer Services and our Board. This self-assessment is published on our website alongside our annual reports. |