

Self-assessment against the Housing Ombudsman's complaints code

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.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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>	Yes	We use this description of a complaint in our policy.
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>	Yes	<p>Colleagues are trained to recognise customer dissatisfaction and investigate. The customer does not have to use the word 'complaint', but colleagues will ask them if they would like to lodge a complaint. This can then be managed via our complaints process.</p> <p>Third party representation is covered in our policy.</p>

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.	Yes	In our policy we've made a distinction between service requests and complaints, but made it clear that a complaint will be logged where the customer requests it and where further enquiries are needed.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>We do not unnecessarily refuse to accept complaints. Our policy lists reasons where we may not consider a complaint and clearly states the right to ask for a review.</p> <p>To support customers our policy lists other organisations that should be contacted for complaints that don't fall within our remit.</p>
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	We've made it clear in our policy that there may be occasions we won't consider a complaint, for example repeated complaints for which customers have already been offered a solution. However, in these circumstances we'll still try to work with the customer to move forward.
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	We provide a full explanation if a complaint isn't accepted. The policy clearly refers customers to the Housing Ombudsman as a route of escalation.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Yes	We've made a distinction in our policy between requests for service and complaints. If a customer expresses dissatisfaction, even if they do not use the word "complaint", we give them the option to register 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.	Yes	Our research partner 'red flags' customer issues that are raised in survey calls and emails us the details. These are actioned immediately.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Yes	Complaints can be made by 'phone, email, letter, through our website, social media channels and in person.

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	We've updated this section to make it clear what customers can expect from the complaint process along with timeframes for each stage. This can be requested in different formats, which we've explained in 2.5.
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	Information about making a complaint is here and you can make a complaint here .
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.	Yes	Whilst we already did this, we've updated our policy to make it clear that we make reasonable adjustments to ensure customers who need additional support to access our complaints service can do so. We've included details for customers wishing to view this policy.
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.	Partial	In our complaint correspondence we make it clear that customers can refer to the Housing Ombudsman Service. We are reviewing all communications we send to customers to identify further opportunities we can publicise HOS to customers.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Partial	In our complaint correspondence we make it clear that customers can refer to the Housing Ombudsman Service. We are reviewing all communications we send to customers to identify further

			opportunities we can publicise HOS to customers.
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	We inform customers that the Housing Ombudsman Service can be contacted at any point but they're unable to formally consider the complaint until we've completed both stages of our complaints process.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Yes	We register complaints or dissatisfaction expressed in our social media channels. For data protection reasons we communicate with the customer directly by their chosen method to maintain privacy. This is part of our procedures and is not explicitly stated within our policy.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	We have a fully trained complaints team, plus dedicated experts within the business, who manage customer complaints.

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	In line with Sovereign's values our training ensures that complaint handlers manage complaints in an impartial and empathetic manner.
------------	--	-----	---

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>Complaint handlers undergo training to ensure they manage complaints sensitively and fairly and empathise with each customer's particular circumstances.</p> <p>The complaints team has the authority and autonomy to take actions to resolve customer complaints. The team is supported by subject matter experts across Sovereign who are able to help resolve complaints as quickly as possible.</p> <p>Sovereign monitors resolution times as part of its performance framework.</p> <p>To further improve complaints handling performance we are centralising our complaints team and adopting a case management approach to give our customers a better experience.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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>	Yes	<p>We have a two-stage approach to the complaint handling process as described in our policy, and complaints are acknowledged within five days.</p>
4.2	<p>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.</p>	Yes	<p>Our acknowledgement letter templates are aligned with those suggested by the Housing Ombudsman.</p> <p>Prior to sending letters we engage with the customer to ensure both parties have the same understanding. We then agree outcomes and the actions required to achieve these.</p>

<p>4.6</p>	<p>A complaint investigation must be conducted in an impartial manner.</p>	<p>Yes</p>	<p>In line with Sovereign's values our training ensures that we manage complaints in an impartial and empathetic manner.</p>
<p>4.7</p>	<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. 	<p>Yes</p>	<p>This is covered within our procedures and is reinforced as part of complaint handlers' training.</p>
<p>4.11</p>	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication</p>	<p>Yes</p>	<p>When we log a complaint we agree the frequency and method of contact with the customer.</p>
<p>4.12</p>	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	<p>Yes</p>	<p>We investigate complaints prior to making a decision on the outcome. This involves speaking with the customer and, if required, the member of staff who is the subject of the complaint.</p>
<p>4.13</p>	<p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.</p>	<p>Yes</p>	<p>This is covered in our policy.</p> <p><i>Raising complaints in good time</i></p> <p><i>We ask for complaints to be made within six months of the matter arising and, unless there is a good</i></p>

		<p><i>reason for doing so, may not be able to consider complaints made after this time.</i></p> <p>Stage 1 complaints <i>When we first receive a complaint it is known as a 'stage 1'. We aim to agree a solution with our customer within ten working days. If this isn't possible (for example, if the complaint is complicated), we may need a further 10 days. If we need to do this we'll let you know why.</i></p> <p>Stage 2 complaints <i>If a customer is unhappy with the decision they've received at stage 1, they have the right to have the decision reviewed. This is known as a 'stage 2' complaint.</i></p> <p><i>A senior manager (overseen by a director) will review how the complaint was handled and the decision(s) made. A complaint can only be taken to stage 2 after it has received a stage 1 response.</i></p> <p><i>If a customer would like their stage 1 complaint reviewed they need to request this. The customer should request this within one year of the date of the stage 1 response.</i></p>
--	--	--

			<p><i>We aim to have a decision on stage 2 complaints within 20 working days. As with stage 1 complaints, we sometimes need extra time to make the right decision, so we may take up to a further 10 days. If we need to do this we will let you know why.</i></p>
4.14	<p>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.</p>	Yes	<p>This is set out in our policy.</p> <p><i>See Complaints we may not consider or escalate</i> section. In summary:</p> <ul style="list-style-type: none"> • Unreasonable customer behaviour • Service Requests • Court proceedings • Outside Sovereign's control
4.15	<p>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.</p>	Yes	<p>All complaints and associated correspondence are attached to the case notes within our CRM.</p>
4.18	<p>Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.</p>	Yes	<p>These are covered in our procedures. Issues are assessed on a case-by-case basis by a panel of colleagues who have knowledge of the customer and/or cases. Each panel will always include a representative from the Complaints service area.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This is part of our training.
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	We have SLAs and KPIs in place to monitor resolution times as part of our performance management framework. Our response template ensures complaint owners address all these points, and this is supported by our training programme.
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	This is covered in our policy: <i>We understand that some customers may want someone else to make the complaint for them and we support this. These complaints will still be handled in line with our policy. To ensure we protect our customers' best interests we require a letter of authority telling us who can act on their behalf. Customers can receive a copy by contacting our Complaints team (sovereignresolutionteam@sovereign.org.uk) or calling 0300 5000 926.</i>
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.	Yes	Where legal obligations are a key element in a complaint we ensure that these are clarified in our response and closure letters.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We won't identify staff unless it's appropriate and necessary to do so.

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We encourage staff to keep accurate records of customer contact on our complaints management system. This is a key tenet of our centralised case management approach.
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.	Yes	We carry out monthly telephone surveys with customers who have recently had a complaint. These surveys give customers the opportunity to score the service on how the complaint was handled and provide verbatim feedback.
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.	Yes	<p>Feedback from our regular surveys is analysed and used to inform service development. For example:</p> <ul style="list-style-type: none"> • Sovereign's new approach to complaint handling directly addresses concerns raised by customers, such as the need for improved communication. • Templated response letters allow colleagues to communicate with customers more quickly, and in a more informative way. • The Complaints team provides guidance and support to service teams in the resolution of complaints on a day-to-day basis. • Monthly in-depth reviews of complaints performance to service-area leads. • Introduction of a self-serve complaints dashboard for service colleagues.

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	<p>Decisions on restricting customer contact are not taken by individuals. Nor are they taken without careful consideration.</p> <p>Any decision that we take about restricting contact is considered by a group of people. This group will vary from customer to customer to ensure those involved are the best-placed to assess the individual needs and circumstances of the customer in question.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>We provide an initial acknowledgement to a complaint.</p> <p>We aim to resolve/respond to complaints within 10 working days.</p> <p>This is covered in our policy:</p> <p><i>We aim to agree a solution with our customer within ten working days. If this isn't possible (for example, if</i></p>

			<p><i>the complaint is complicated), we may need a further 10 days. If we need to do this we'll let you know why.</i></p> <p>From April 2023 a corporate KPI will be in place to track compliance with response time requirements. This is in addition to tracking complaint resolution times.</p> <p>Our responses use the Housing Ombudsman template as a blueprint to ensure best practice is adhered to.</p>
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. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	<p>Our policy covers this. If we cannot complete the actions necessary to resolve the issue before the letter is sent, we will detail what will be done, and by when.</p> <p>Our Complaints team monitors all outstanding actions to ensure they are completed.</p>
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.	Partial	<p>Our responses use the Housing Ombudsman template as a blueprint to ensure best practice is adhered to.</p> <p>This is part of our procedures and used by the Complaints team. As at February 2023 the templates are being rolled-out for all complaint owners in Sovereign.</p>

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 • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Partial	This is covered in 5.6 above.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Yes	<p>Our two-stage process is covered in our policy (see 4.13 above).</p> <p>The reasons why we would not escalate a complaint are covered in our policy (see 4.14 above).</p>
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.	Yes	Our stage 2 response template guides complaint owners through the process to ensure all aspects of a customer's complaint are understood and addressed. In cases where further clarification is needed the stage 2 complaint owner will contact the customer to discuss.

<p>5.11</p>	<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</p>	<p>This is Sovereign’s process and is referenced in the policy:</p> <p><i>A complaint can only be taken to stage 2 after it has received a stage 1 response.</i></p>
<p>5.12</p>	<p>The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.</p>	<p>Yes</p>	<p>This is covered in our policy:</p> <p><i>A senior manager (overseen by a director) will review how the complaint was handled and the decision(s) made.</i></p>
<p>5.13</p>	<p>Landlords must respond to the stage two complaint within 20 working days 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.</p>	<p>Yes</p>	<p>We’ve made our policy clearer on this that it’ll be within 20 working days plus an additional 10 where necessary.</p>
<p>5.16</p>	<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"> • the complaint stage • the complaint definition • 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"> • if the landlord has a third stage, details of how to escalate the matter to stage three 	<p>Partial</p>	<p>Our responses use the Housing Ombudsman template as a blueprint to ensure best practice is adhered to.</p> <p>This is part of our procedures and used by the Complaints team. As at February 2023 the templates are being rolled-out for all complaint owners in Sovereign.</p> <p>(see 5.6 above)</p>

	<ul style="list-style-type: none"> if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		
--	---	--	--

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Sovereign operates a two-stage complaints process (see above 4.13).
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition 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 	N/A	Sovereign operates a two-stage complaints process (see above 4.13).

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

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	This is within our procedure. It is also within our policy where we stipulate 10 working days. <i>We aim to agree a solution with our customer within ten working days. If this isn't possible (for example, if the complaint is complicated), we may need a further 10 days. If we need to do this we'll let you know why.</i>
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	This is within our procedure.
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	Where appropriate and possible we will investigate historical reports to assist with the resolution of a complaint.
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	This is a business-as-usual approach at Sovereign, if the additional complaints are relevant. If they are unrelated we will open a new complaint.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
---------------------	-------------------------	-----------------------	--

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	This is within our procedure and policy. <i>We aim to have a decision on stage 2 complaints within 20 working days. As with stage 1 complaints, we sometimes need extra time to make the right decision, so we may take up to a further 10 days. If we need to do this we will let you know why.</i>
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	This is within our procedure

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 within 20 working days 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	Sovereign operates a two-stage complaints 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	Sovereign operates a two-stage complaints process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Sovereign has a dedicated Complaints team supported by robust procedures as outlined in this self-assessment.
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	<p>Sovereign has a dedicated Complaints team supported by robust procedures as outlined in this self-assessment.</p> <p>Sovereign has a defined compensation policy that operates in tandem with its complaints processes.</p> <p>The compensation policy is under review to ensure it complies with Housing Ombudsman best practice (February 2023).</p>
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	Sovereign has a defined compensation policy that operates in tandem with its complaints processes.
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	Sovereign has a defined compensation policy that operates in tandem with its complaints processes.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	As per 4.17, as part of our regular performance reviews we identify and act upon improvement opportunities.
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	The Complaints team works closely with our colleagues in our legal team to ensure any agreement is fair and equitable. Each case is assessed upon its merits.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Partial	<p>We report back to customers on improvements we have made on a quarterly basis.</p> <p>We recognise that this is an area of improvement for Sovereign and are working hard to ensure greater transparency.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

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.	Yes	Our CCO presents a monthly complaints overview to our Executive Board. The Executive Board is responsible for approving and signing off complaints policy.
7.4	As a minimum, governing bodies should receive: <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 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. 	Yes	This information is included within the monthly report to Executive Board (see 7.3 above).
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.	Yes	The monthly report is also presented to our operational leadership team (see above 7.3).
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"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments 	No	The implementation of our new complaints process will re-enforce this.

	<ul style="list-style-type: none"> • 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. 		
--	--	--	--

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	We conduct annual reviews of our policy and procedures to ensure our complaints handling is as good as it can be
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	An interim self-assessment will also be carried out following the full implementation of our new complaints process (see 3.3 above).
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 	Partial	<p>Following this review the findings will be shared with our Executive Board and be published on Sovereign's website.</p> <p>Sovereign does not have a complaints handling section in its annual report.</p>