

## Our Self-Assessment against Complaints Handling Code April 2024

Updated August 2024



| Section 1: Definition of a complaint |  |                  |  |  |
|--------------------------------------|--|------------------|--|--|
| Code provision                       | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
| 1.2                                  | A complaint must be defined as:<br><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>  | Yes              | Complaints and Feedback Policy 1.10 states:<br><i>A Complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, our staff, or those acting on our behalf affecting an individual or group of individuals.</i>  | The words 'landlord' and 'residents' replaced with 'organisation' and 'individuals' as we deliver services other than housing. |
| 1.3                                  | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.                             | Yes              | Complaints and Feedback Policy 1.10 states:<br>The person does not have to use the word complaint in order for it to be treated as such.<br><i>Complainant is the person making the complaint. This may be a person who uses our services, third-party making the complaint on behalf of a person who uses our services, a representative of another organisation or a member of the public.</i> |  |
| 1.4                                  | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes              | Sections 3 and 4.1 explain the difference. It also confirms that all are recorded internally to allow monitoring and review of trends.   |  |

| Section 1: Definition of a complaint |  |                  |  |                          |
|--------------------------------------|--|------------------|--|--------------------------|
| Code provision                       | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
| 1.5                                  | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.  | Yes              | Section 3 states <i>If the person is not satisfied with the action taken or our approach to resolving their concern/service request, they will have the opportunity to make a complaint.</i>   |                          |
| 1.6                                  | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes              | Section 1.6 states <i>Information about how to provide feedback and make complaints will be promoted to people who use our services, and other stakeholders via service user handbooks/welcome packs, posters/leaflets in reception areas, service newsletters, social media, surveys.</i> |                          |

| Section 2: Exclusions |  |                  |  |                          |
|-----------------------|--|------------------|--|--------------------------|
| Code provision        | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
| 2.1                   | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits | Yes              | Section 4.2 states <i>All complaints will be accepted unless there is a valid reason not to do so. In which case, we will provide a clear explanation and either address the issues through a more appropriate process or signpost to alternative complaint routes and provide contact details for Ombudsman where applicable.</i> |                          |

## Section 2: Exclusions

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 2.2            | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul> | Yes              | Section 4.2 gives examples of where complaints will not be accepted and comply with the acceptable exclusions in the Code.  |                          |
| 2.3            | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.  | Yes              | <p>Section 4.2 states <i>Something that happened, or which the individual knew happened more than 12 months ago. This does not include complaints about safeguarding or Health and Safety issues which will always be investigated.</i></p> <p><i>We will use discretion to accept complaints made outside of this time limit if there are good reasons to do so.</i></p> |                          |
| 2.4            | If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.   | Yes              | Section 4.2 states <i>All complaints will be accepted unless there is a valid reason not to do so. In which case, we will provide a clear explanation and either address the issues through a more appropriate process or signpost to alternative complaint routes and provide contact details for Ombudsman where applicable.</i>  |                          |
| 2.5            | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes              | This is explained in sections 4.1 and 4.2.  |                          |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes              | <p>Section 2 gives examples of how feedback can be provided including through another person such as a family member, friend, advocate, solicitor or other professional they are working with.</p> <p>Section 4.3 explains what support and assistance can be made available including reasonable adjustments.</p>  |                          |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.   | Yes              | <p>Section 1.5 details roles and responsibilities of staff around identifying feedback and recording or passing this on appropriately.</p> <p>Managers ensure complaints handling is promoted within services, staff training is completed and learning from feedback is circulated and embedded.</p> <p>All employees and volunteers have responsibility for identifying feedback and recording or passing this on appropriately.</p> <p>The Complaints Policy is part of the staff induction process. Managers are required to identify learning from a complaint and embed learning. Learning from complaints is discussed in team meetings.</p> |                          |
| 3.3            | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.  | Yes              | <p>Our positive approach to complaints and learning culture is explained in Section 1.1 and Section 9.</p>  |                          |
| 3.4            | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.                                | Yes              | <p>Section 1.6 states that the policy is published on our website and can be made available in other formats.</p> <p>Sections 5 and 6 details what will happen and timescales of each stage.</p> <p>An overview of the process is also available on the website.</p>  |                          |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
| 3.5            | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.                                       | Yes              | <p>Section 1.6 explains how the policy will be promoted including via service user handbooks/welcome packs, posters/leaflets in reception areas, service newsletters, social media, surveys. It also states that complainants will be informed about relevant Ombudsman schemes that are available to them.</p> <p>Section 1.9 references compliance with the Housing Ombudsman's Complaint Handling Code 2024.</p> <p>Appendix 3 includes details of the Ombudsman and link to the resident information section on their website.</p> | Contact details for the Housing Ombudsman are also included in template letters for correspondence relating to complaints. |
| 3.6            | Landlords must 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. | Yes              | Section 4.3 details the arrangements for support and assistance to complain including being represented or accompanied by a suitable person at any meeting.  |  |
| 3.7            | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.             | Yes              | Section 4.3 explains that information will be provided about other local and national organisations who can support to make a complaint.   | Contact details for the Housing Ombudsman are also included in template letters for correspondence relating to complaints. |

#### Section 4: Complaint Handling Staff

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 4.1            | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer.' This role may be in addition to other duties. | Yes              | <p>Section 1.5 details the roles and responsibilities for a Complaint Handler who would be responsible for the investigation of individual complaints and communication with the complainant, taking action to resolve the issues identified (where applicable). This would be processed and recorded in line with the Policy and therefore the requirements of the Housing Ombudsman Code.</p> <p>The Quality and Performance Team is responsible for complaints reports and will liaise with the Housing Ombudsman to ensure compliance with the Code.</p>                          |                          |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes              | Sections 1.5 and 5.1.3 explain that the Complaint Handler will have access to staff at all levels to facilitate the quick resolution of complaints. Complaints are only allocated to managers who have completed training and has sufficient authority to put any issues right.   |                          |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.                           | Yes              | <p>4.8 covers Allocating Complaint Handlers</p> <p><i>Most complaints can be handled by a manager of a team or Service, however depending on the nature and seriousness of the complaint, it may be investigated by a more senior manager, or a manager from another service. To prioritise complaint handling, all staff will be suitably trained; have protected time to avoid delays; and consideration will be given to any planned leave any actual or perceived conflict of interest. Complaints will not be handled by any staff member that the complaint relates to.</i></p> |                          |

## Section 5: The Complaint Handling Process

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
| 5.1            | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.  | Yes              | Section 1.3 Scope states <i>This policy relates to all activities of the Group (Humankind, Richmond Fellowship and Aquarius), including its subsidiaries unless agreed partnership or contractual arrangements specify an alternative procedure.</i><br><br>Section 1.1 states <i>We will encourage and support people through the complaints process and ensure complainants are not discriminated against or victimised – the service a person receives will not be negatively affected if they make a complaint, or if somebody complains on their behalf.</i> |   |
| 5.2            | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.                               | Yes              | Section 1.2 explains there are two stages.  | Service requests are monitored to ensure that they are not used to prevent issues progressing to complaints.  |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.  | Yes              | Section 1.2 explains there are two stages.  |   |
| 5.4            | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes              | Section 1.4 explains the arrangements around partnership, sub-contracting and commissioners and that a local written procedure will be put in place to <i>Ensure that individuals are not required to go through two complaints processes.</i>  | Complaint Handlers for housing complaints would seek input from the third party and this will be included in the investigation as part of our two stage complaints process. |
| 5.5            | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Yes              | As above the appropriate process will be followed in such cases.  |   |

| Section 5: The Complaint Handling Process |  |                  |  |                          |
|---|--|------------------|--|--------------------------|
| Code provision                            | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
| 5.6                                       | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition.” If any aspect of the complaint is unclear, the resident must be asked for clarification.   | Yes              | Sections 5.1.4 and 6.1 explain the approach taken to establish the complaint definition, in line with the Code.  |                          |
| 5.7                                       | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.   | Yes              | Section 4.6 explains the approach taken for complaints involving multiple organisations and clarifying with the complainant, which of the key points we are responsible for investigating. Support can be provided to raise other concerns with the relevant organisation. |                          |
| 5.8                                       | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a) deal with complaints on their merits, act independently, and have an open mind;</li> <li>b) give the resident a fair chance to set out their position;</li> <li>c) take measures to address any actual or perceived conflict of interest; and</li> <li>d) consider all relevant information and evidence carefully.</li> </ul> | Yes              | Section 5.1.3, 5.1.4 and Section 6 sets out the approach taken around these areas by complaint handlers.   |                          |
| 5.9                                       | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes              | Section 5.1.4 includes arrangements of how and when we will keep the complainant updated.  |                          |



## Section 5: The Complaint Handling Process

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 5.10           | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | Yes              | Section 4.3 details the arrangements around support and assistance to complain. It states <i>We will record reasonable adjustments on the complaint record and keep these under review to ensure they continue to meet the person's needs.</i>  |                          |
| 5.11           | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.   | Yes              | Section 1.2 states <i>Complaints will not be refused unless there are valid reasons for doing so, these will be clearly communicated and documented.</i><br><br>Section 6.0 relating specifically to Stage 2 Appeals states <i>We will always accept an appeal request unless there is a valid reason not to do so which will be communicated to the complainant and recorded on the complaint record on the relevant recording system.</i> |                          |
| 5.12           | A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.                      | Yes              | Section 1.10 and 5.1.3 explains that all records and correspondence are held on the relevant recording system.  |                          |
| 5.13           | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.  | Yes              | Section 7.0 states <i>Any failings should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the complainant. This can be arranged at any stage of the process and does not need to wait until the complaint has been closed.</i>  |                          |

| Section 5: The Complaint Handling Process |   |                  |                                    |                          |
|---|---|------------------|------------------------------------|--------------------------|
| Code provision                            | Code requirement  | Comply: Yes / No | Evidence                           | Commentary / explanation |
| 5.14                                      | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes              | Section 4.9 details this approach. |                          |
| 5.15                                      | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.  | Yes              | Section 4.9 details this approach. |                          |

| Section 6: Complaints Stages |   |                  |   |  |
|------------------------------|---|------------------|---|--|
| Stage 1                      |   |                  |   |  |
| Code provision               | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
| 6.1                          | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes              | Section 5.1.2 states <i>Complaint Handlers will identify complex complaints as early as possible to prevent unnecessary delays. They will consider any vulnerability of the person and associated risks when agreeing a revised timescale with the complainant. Actions to mitigate any immediate risks will be considered.</i> |  |
| 6.2                          | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>  | Yes              | Section 5.1.1 states <i>All complaints will be acknowledged in writing, by letter or email, within 3 working days.</i>  | The organisational approach of 3 working days has been applied for consistency and does not adversely affect complainants. |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Yes              | <p>Section 5.1.2 states <i>We aim to resolve all complaints within the following timescales:</i></p> <ul style="list-style-type: none"> <li>• <i>Complaints received by Richmond Fellowship and Aquarius services – 10 working days</i></li> <li>• <i>Complaints received by Humankind services (from non-residents) – 20 working days</i></li> <li>• <i>Complaints from Humankind Residents – 10 working days</i></li> </ul>  |                          |
| 6.4            | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes              | Section 5.1.2 acknowledges that some complaints may be complex in nature and an extension to the policy timescale may need to be agreed but that this should not exceed 10 working days and should not delay actions to put things right.  |                          |
| 6.5            | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes              | Section 5.1.2 confirms that in the case of revised timescales contact details will always be provided.   |                          |
| 6.6            | A complaint response must be provided 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 promptly with appropriate updates provided to the resident.                                 | Yes              | <p>Section 7.0 states <i>Any failings should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the complainant. This can be arranged at any stage of the process and does not need to wait until the complaint has been closed.</i></p> <p>It goes on to state <i>Any further actions that need to be completed after the person has been informed of the outcome will continue to be tracked, actioned promptly and updates provided to the person.</i></p> |                          |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
|----------------|--|------------------|--|---|
| 6.7            | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.  | Yes              | Section 5.1.8 details the approach taken by Complaint Handlers when communicating their findings and decisions.  | Template letters are used in line with the Code's requirements. |
| 6.8            | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.  | Yes              | Section 5.1.4 describes the process taken where additional complaints are raised dependant on whether the outcome of the investigation has been issued or potential delays caused by any further investigation required. |   |
| 6.9            | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a) the complaint stage;<br>b) the complaint definition;<br>c) the decision on the complaint;<br>d) the reasons for any decisions made;<br>e) the details of any remedy offered to put things right;<br>f) details of any outstanding actions; and<br>g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes              | Section 5.1.8 details the approach taken by Complaint Handlers when communicating their findings and decisions. This is compliant with the Code.   | Template letters are used in line with the Code's requirements. |

## Section 6: Complaints Stages

### Stage 2

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.                              | Yes              | Section 6 states <i>If the complainant is unhappy with all or part of the response to their complaint, we will progress their complaint to the Appeal Stage. Complaints can only be appealed once; this is the final stage of our Complaint Process before the complaint is closed.</i> |   |
| 6.11           | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.   | Yes              | Section 6.1 states <i>All appeal requests will be acknowledged in writing, by letter or email, within 3 working days.</i>   | The organisational approach 3 working days has been applied for consistency and does not adversely affect complainants.     |
| 6.12           | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes              | Section 6 states <i>The person does not need to give a reason for appealing the outcome, but Appeal Handlers are expected to make reasonable efforts to understand why the person remains unhappy with the initial outcome.</i>   |   |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes              | Section 6.2 states <i>An Appeal Handler should be appointed as soon as an appeal is requested. The Appeal Handler will be a manager more senior than the Complaint Handler and have the authority to resolve the issues highlighted within the complaint and appeal.</i>                |   |
| 6.14           | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes              | Section 6.1 states <i>The appeals process, and communication to the complainant will be completed within 10 working days.</i>   | The organisational approach of 10 working days has been applied for consistency and does not adversely affect complainants. |

## Section 6: Complaints Stages

### Stage 2

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
| 6.15           | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes              | Section 6.1 states <i>If these timescales cannot be met due to the complexity of the complaint, the Appeal Handler will explain to the complainant and agree a revised timescale for keeping them updated. Any extension should not exceed 10 working days and should not delay actions to put things right.</i>      | The organisational approach of 10 working days has been applied for consistency and does not adversely affect complainants. |
| 6.16           | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes              | Section 6.1 states contact details are to be provided.  |   |
| 6.17           | A complaint response must be provided 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 promptly with appropriate updates provided to the resident.                                 | Yes              | Section 7 around redress states <i>Any failings should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the complainant. This can be arranged at any stage of the process and does not need to wait until the complaint has been closed.</i> |   |
| 6.18           | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | Yes              | Section 6.3 details this approach and template letters are used to populate this information.   |   |

## Section 6: Complaints Stages

### Stage 2

| Code provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation |
|----------------|--|---------------------|---|--------------------------|
| 6.19           | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br><br>a) the complaint stage;<br>b) the complaint definition;<br>c) the decision on the complaint;<br>d) the reasons for any decisions made;<br>e) the details of any remedy offered to put things right;<br>f) details of any outstanding actions; and<br>g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes                 | Section 6.3 details this approach and template letters are used to populate this information. |                          |
| 6.20           | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.  | Yes                 | Section 6 confirms this to be the case.   |                          |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 7.1            | <p>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. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes              | <p>Section 7 details this approach and this structure is set out in template letters.</p> <p>7.1 states <i>When considering redress for complaints from our residents, the guidance issued by the Housing Ombudsman should be referred to in addition to the relevant Compensation Policy.</i></p> |                          |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | Sections 7 and 7.1 details this approach.  |                          |
| 7.3            | 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              | Sections 7 and 7.1 details this approach and this is set out within the template letters.  |                          |
| 7.4            | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.   | Yes              | 7.1 states <i>When considering redress for complaints from our residents, the guidance issued by the Housing Ombudsman should be referred to in addition to the relevant Compensation Policy.</i>  |                          |



## Section 8: Putting things right

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c) any finding of non-compliance with this Code by the Ombudsman;</li> <li>d) the service improvements made as a result of the learning from complaints;</li> <li>e) any annual report about the landlord's performance from the Ombudsman; and</li> <li>f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p>Section 9.3 sets out our approach.</p> <p><i>We will:</i></p> <ul style="list-style-type: none"> <li>• <i>prepare quarterly reports on the number and type of complaints, outcomes, trends and learning, and any complaints we have refused to accept.</i></li> <li>• <i>monitor compliance with this policy through regular service inspections</i></li> <li>• <i>review records of reasonable adjustments and restrictions used at least annually</i></li> <li>• <i>liaise with relevant Ombudsman to ensure compliance with the requirements of their schemes</i></li> <li>• <i>publish an annual report and self-assessment against the Housing Ombudsman's Complaints Handling Code including a response from our Board and any reports or publications around non-compliance from the Ombudsman will be included. Our self assessment will be updated following any significant changes or at the request of the Ombudsman.</i></li> </ul> |                          |
| 8.2            | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.   | Yes              | Section 9.3 confirms this.  |                          |
| 8.3            | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes              | Section 9.3 confirms this approach.   |                          |

| Section 8: Putting things right |   |                  |  |                          |
|---------------------------------|---|------------------|--|--------------------------|
| Code provision                  | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
| 8.4                             | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes              | Section 9.3 acknowledges this.   |                          |
| 8.5                             | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes              | If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance. |                          |

| Section 9: Scrutiny & oversight: continuous learning and improvement |  |                  |   |                          |
|--|--|------------------|---|--------------------------|
| Code provision   | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
| 9.1  | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.   | Yes              | Section 9.3 focuses on governance, monitoring and review. All feedback is monitored and reviewed through our governance meetings and reporting structures.<br><br>Complaint Handlers and Appeal Handlers are unable to close a complaint until learning is identified. This learning is shared across staff teams and consideration to changes in process or practice is given. |                          |
| 9.2  | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes              | Section 9.3 confirms this approach.   |                          |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.   | Yes              | Section 9.3 states <i>Changes made as a result of feedback will be promoted to people who use our services, and other stakeholders, including within newsletters, information within reception areas, websites, groups, panels and councils of people who use our services.</i>  |                          |
| 9.4            | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.   | Yes              | Section 1.5 states <i>Quality and Performance / Quality and Compliance Teams are responsible for providing quarterly reports on complaints and other feedback, and regular service inspections to ensure our complaints procedure is accessible, the policy is followed, and learning is used to improve our services. A member of the Quality and Performance / Quality and Compliance Teams will liaise with the Housing Ombudsman to ensure compliance with the Code.</i> |                          |
| 9.5            | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').                               | Yes              | Section 1.5 confirms the role and responsibilities of the MRC as a member of the Board.  |                          |
| 9.6            | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes              | Section 1.5 Roles and responsibilities states <i>Member Responsible for Complaints ('the MRC') is a member of the Board who is responsible for ensuring the Board receives regular information on complaints that provides insight to the governing body on our complaint handling of complaints made by Residents. The expectations of the Role are defined by the Housing Ombudsman – a link to the Ombudsman's Expectations for the MRC is included.</i>                  |                          |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 9.7            | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b) regular reviews of issues and trends arising from complaint handling;</li> <li>c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d) annual complaints performance and service improvement report.</li> </ul>          | Yes              | Section 9.3 states that reports will be shared with our Board which includes the MRC. |                          |
| 9.8            | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c) act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes              | Section 1.1 sets out this approach.   |                          |