

# Housing Ombudsman Complaint Handling Code 2024

Self-assessment June 2024

Evidence is provided for each element of the Code, but commentaries / explanations are only provided where they are needed to clarify points of evidence, or to explain what steps we are taking to become compliant. Actions are highlighted and contained within our Complaints Improvement Plan.

RAG key: Compliant with appropriate assurance Compliant but further assurance needed Not compliant and/or significant assurance gaps

## Section 1: Definition of a complaint

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
1.2	A complaint must be defined as: <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	<u>Complaints Policy</u> (3.5) Complaints Procedure May 2024 (1.6) Staff training materials		
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	<u>Complaints Policy</u> (3.7, 4.4) Complaints Procedure May 2024 (2.1) Staff training materials	Whilst we accept complaints from third parties, we do not currently collect data to identify these cases within our system.  <b>ACTION:</b> complete system changes to start to collect this data by end Q2 2024/25.	



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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	<u>Complaints Policy</u> (3.1, 3.4, Section 4)  Complaints Procedure May 2024 (1.6)  Staff training materials		
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	<u>Complaints Policy</u> (3.2, 3.3)  Complaints Procedure May 2024 (1.6)  Staff training materials		
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	<u>Complaints Policy</u> (4.6)  Telephone survey process  Customer survey templates (Survey Monkey)	Staff who carry out telephone surveys actively signpost to our complaints procedures as necessary. This is also the case with TLF, an external company who carries out surveys on our behalf.  We have included a link to our complaints process on for surveys hosted by Survey Monkey.  We will seek further assurance by including links to our complaints procedures on surveys hosted through Power Plus.  <b>ACTION:</b> Complete system changes by end Q2 2024/25.	

## Section 2: Exclusions

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (3.6, 3.9 – 3.12)  Complaints Procedure May 2024 (2.3, 2.7 – 2.9)  Staff training materials	We do not currently record when we refuse to accept a complaint, and our reasoning for doing so. We want to be able to check that we are acting reasonably and have confidence that our policy is not unfairly disadvantaging groups of residents.  <b>ACTION:</b> Complete system changes by end Q2 2024/25.	
2.2	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: <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			
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			

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			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes			

### Section 3: Accessibility and Awareness

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (4.2 – 4.3) <u>Prioritisation Policy</u> <u>Customer website</u> Complaints Procedure May 2024 (1.1) Staff training materials <u>Customer communications</u>	Our <u>customer website</u> details the way in which complaints can be raised: <ul style="list-style-type: none"> <li>• Online (My Account)</li> <li>• By telephone</li> <li>• Live Chat</li> <li>• Online (e-Form)</li> <li>• Online (Email)</li> <li>• In writing</li> <li>• In person</li> </ul> We want to gain further assurance that customers have access to material promoting our complaints process non-digitally (leaflets, posters, etc.)  <b>ACTION:</b> Agree range of non-digital promotional material for circulation before ed Q2 2024/25.	

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	<u>Complaints Policy</u> (4.1) Complaints Procedure May 2024 (2.1) Staff training materials		
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	<u>Complaints Policy</u> (Section 2, Section 8) Staff training materials CSC / Board papers	The Head of Complaints and Resolution monitors complaint levels across the business as part of performance monitoring for the Member Responsible for Complaints (MRC), Customer Services Committee (CSC) and Board.	
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	<u>Complaints Policy</u> (1.4, Section 4 ~ 4.15 - 4.27) <u>Customer website</u> Complaints Procedure May 2024 Staff training materials	Complaints Policy is available on <a href="http://www.a2dominion.co.uk/policies">www.a2dominion.co.uk/policies</a> Navigating to a2dominion.co.uk, hovering over "Help" from the top. Our dedicated complaints page <a href="http://www.a2dominion.co.uk/complaints">www.a2dominion.co.uk/complaints</a> sets out how customers can make a complaint and other useful information.	
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	<u>Complaints Policy</u> (1.3) <u>Customer communications</u>	Articles are placed periodically in Home magazine (most recently May 2024). On-site staff at schemes are asked to print off a copy and pin it to a noticeboard.  We want to gain further assurance that customers have access to material promoting the Ombudsman and the Code non-digitially (leaflets, posters, etc.)  <b>ACTION:</b> Agree range of non-digital promotional material for circulation before end Q2 2023/24.	

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	<u>Complaints Policy</u> (4.4) Complaints Procedure May 2024 (2.1) Staff training materials	Linked with 1.3, whilst we accept complaints from third parties, we do not currently collect data to identify these cases within our system. <b>ACTION:</b> Complete system changes to start to collect this data by end Q2 2024/25.	
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	<u>Complaints Policy</u> (7.2 – 7.4) <u>Customer website</u> Complaints Procedure May 2024 Staff training materials Letter / email templates	The public website at the page <u>How do you deal with service complaints?</u> states that “Customers have the right to request that their complaint be considered by the Housing Ombudsman Service (HOS) at any stage of the process.” Additionally, the page <u>What if I’m unhappy with the outcome of my complaint?</u> links to HOS.  Linked with 3.1 & 3.5 We want to gain further assurance that customers have access to material promoting the Ombudsman and the Code non-digitally (leaflets, posters, etc.)  <b>ACTION:</b> Complete review of webpage by end June 2024.  <b>ACTION:</b> Agree range of non-digital promotional material for circulation before end Q2 2024/25.	

## Section 4: Complaint Handling Staff

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	Organisational structure	<p>The overall complaint handling processed is managed by the Complaints &amp; Resolution Service (CRS) within the Operational Performance department.</p> <p>The CRS is led by the Head of Complaints &amp; Resolution, supported by two Complaints Managers who themselves have a team of Complaints Caseworkers. The role of the CRS is to provide administrative support and case management to the overall complaints process.</p> <p>The Head of CRS is responsible for the interface with the Housing Ombudsman Service.</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	Organisational structure	<p>Head of CRS is part of a wider group of heads of service, and also has a network of complaints champions from across the business.</p> <p>Complaints champions are embedded into individual departments, with each working closely with the assigned CRS worker to ensure that complaints are resolved promptly within their respective service areas. There are different processes followed at each of the stages of the complaint, and different processes depending on which lead department is identified.</p>	
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	Yes	<p>Organisational structure</p> <p>Staff training materials</p>	CRS staff undergo significant amounts of training when they join us, including our complaint handling process and culture.	

	complaints are seen as a core service and must be resourced to handle complaints effectively.			Complaints champions embedded throughout the business receive training and refresher sessions both on a regular basis but also where intervention is needed as a result of performance.  Head of CRS is responsible for ensuring that the team is adequately resourced.	
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## Section 5: The Complaint Handling Process

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> Staff training materials Complaints Procedure May 2024 (1.6)	We operate a single policy for dealing with complaints covered by the HOS Code 2024.	
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	<u>Complaints Policy</u> (4.9) Staff training materials Complaints Procedure May 2024 (2.2)	We do not have any pre-complaint, or informal complaint stage.	
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	<u>Complaints Policy</u> (7.3) Staff training materials Complaints Procedure May 2024 (1.2 – 1.3) Letter templates	Our policy only contains two stages.	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or	Yes		We do not contract out any aspect of complaint handling in relation to services carried out on our	



	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.			behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		We do not contract out any aspect of complaint handling in relation to services carried out on our behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.	
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	<u>Complaints Policy</u> (4.16 – 4.18, 4.25 – 4.26)  Staff training materials  Complaints Procedure May 2024 (3.3, 4.2)		
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	<u>Complaints Policy</u> (4.18, 4.26)  Staff training materials  Complaints Procedure May 2024 (3.3, 4.2)		
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> </ul>	Yes	<u>Complaints Policy</u> (4.11)  Staff training materials  Complaints Procedure May 2024 (3.2, 3.6, 4.4, 4.5)		

	d. consider all relevant information and evidence carefully.				
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	<u>Complaints Policy</u> (4.16 – 4.19, 4.22 – 4.26)  Staff training materials  Complaints Procedure May 2024 (3.2, 4.2)	Whilst we have a compliant policy, and are aware that this is happening in practice, we do not currently record agreed extensions of timescales within our system in a way that is reasonably easy to access aside from a manual intervention. The system change request to start to collect this data in a more efficient way is ongoing. Once this happens, we plan to start to monitor extensions to identify further service improvements. This is also linked to 6.4 and 6.5 below.  <b>ACTION:</b> Complete system changes to start to collect this data by end Q2 2024/25	
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	<u>Complaints Policy</u> (4.3)  Staff training materials  Complaints Procedure May 2024 (3.3, 4.5)  Customer records (Dynamics / UH / CM)  <u>Prioritisation Policy</u>	As part of reports available to managers and senior managers, complaints raised against a customer file where a vulnerability is recorded are highlighted to enable proactive review.  Resident / household vulnerabilities are recorded separately in our systems. System improvements will bring vulnerability data into the same system. In the meantime, CRS workers are trained to check recorded vulnerabilities.  <b>ACTION:</b> Complete system changes to start to collect this data by end Q3 2024/25	
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	Yes	<u>Complaints Policy</u> (4.2)  Staff training materials		

	out these reasons, and they must comply with the provisions set out in section 2 of this Code.		Complaints Procedure May 2024 (4.1)		
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	<u>Complaints Policy</u> (4.8) Staff training materials Complaints Procedure May 2024 (3.8, 4.8) Customer records (Dynamics)	We use Dynamics 365 to record all aspects of customer feedback. Within this, there is a single timeline of a customer complaint, any correspondence with the customer or other parties, and any other relevant supporting documentation.	
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	<u>Complaints Policy</u> (4.9, Section 5) Staff training materials Complaints Procedure May 2024 (Section 1, 2.2)		
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.	No	<u>Complaints Policy</u> (4.5) Staff training materials Complaints Procedure May 2024 (Section 5) Unacceptable Actions by Complainants Policy 2020	The Unacceptable Actions by Complainants Policy is out of date and needs more detail to comply with the Code requirements, including consideration of how we evidence decisions made in line with our duties under the Equality Act 2010. An initial review has concluded that this policy should be updated in line with the wider Cautionary Alerts, and that this will need to happen in consultation with resident representatives. Once completed, this self-assessment will be updated.	
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.	No		Whilst we do keep any restrictions under review on a local basis (i.e. the colleague who placed the restrictions would keep a note themselves to review the restrictions) we are working on embedding this	

				<p>functionality within our complaints system for a central overview and improved ability to evidence decisions made under the policy in line with Code requirements.</p> <p><b>ACTION:</b> Work to update the Unacceptable Action by Complainants Policy and the Cautionary Alerts Policy will commence in June 2024 and expect completion, including customer engagement by end Q3 2024/25.</p> <p><b>ACTION:</b> An interim procedure for centrally recording decisions taken under the Unacceptable Actions by Complainants Policy to be implemented by end July 2024.</p> <p><b>ACTION:</b> As part of the new policy and procedure, a more formal process for recording decisions taken under the policy to be introduced by end Q3 2024/25.</p> <p><b>ACTION:</b> Once the new policy and procedure is live, update the self-assessment to confirm compliance to the Code by end Q3 2024/25.</p>	
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## Section 6: Complaints Stages

### Stage 1

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	Yes	<p>Staff training materials</p> <p>Complaints Procedure May 2024 (2.2)</p> <p><u>Prioritisation Policy</u></p>	Our new Service Recovery team has been set up within repairs to support customers where we recognise repeated contact, with the aim to try and get works back on track.	

	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.		Organisational structure		
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b>within five working days of the complaint being received.</b>	No	<u>Complaints Policy</u> (4.15, 4.19) Staff training materials	Despite the stated policy and procedure position, for cases marked as resolved in 2023/24, we only responded to 49% of Stage 1 complaints within timescales for both the acknowledgement and response. This performance highlights operational challenges which result in non-compliance with the Code requirements.  A Complaints Improvement Action Plan is established and is starting to make progress – for instance showing that cases marked as resolved between 1 April and 20 May 2024, compliance was 77% for Stage 1. The progress against the plan is being monitored by CSC and Board.  <b>ACTION:</b> Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve compliance by end September 2024.	
6.3	Landlords must issue a full response to stage 1 complaints <b>within 10 working days</b> of the complaint being acknowledged.	No	Complaints Procedure May 2024 (2.6, 3.4) Power BI reports CSC / Board reports		
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	Yes	<u>Complaints Policy</u> (4.19) Staff training materials Complaints Procedure May 2024 (3.9)	As above in 5.9, whilst this happens in practice, current system limitations mean that there is no evidence within the system to show cases where we are agreeing extensions to timescales. It therefore cannot be assessed that we are applying good reasoning to our decisions. This is part of a planned	

	good reason, and the reason(s) must be clearly explained to the resident.		Customer records (Dynamics)	system change request to start to collect and report on this data. This will provide further assurance for compliance.	
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		<b>ACTION:</b> Complete system changes to start to collect this data by end Q2 2024/25	
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.	No	<u>Complaints Policy</u> (4.10) Staff training materials Complaints Procedure May 2024 (3.7) Power BI reports	Our performance of tracking outstanding actions to resolution needs to improve. Reports are provided to business areas (functions) to monitor 'promise dates' to resolution. Non-compliance of promise dates is reported to Director and Executive level for appropriate resolution.  This is a key area of focus for us in 24/25 to improve. The reports we have, now provide full visibility of the progress of actions. We will be using this data to drive performance improvements. We anticipate significant improvement in our overall compliance by September 2024.  <b>ACTION:</b> Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve significant improvement in compliance by end Q2 2024/25.	
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	<u>Complaints Policy</u> (4.12) Staff training materials		

			Complaints Procedure May 2024 (3.7) Letter templates		
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	<u>Complaints Policy</u> (4.20) Staff training materials Complaints Procedure May 2024 (3.10)		
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<u>Complaints Policy</u> (4.12) Staff training materials Complaints Procedure May 2024 (3.7) Letter templates		

## Stage 2

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<p><u>Complaints Policy</u> (4.12, 4.29)</p> <p>Complaints Procedure May 2024 (4.1, 4.2)</p> <p>Staff training materials</p>	.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within <b>five working days</b> of the escalation request being received.	No	<p><u>Complaints Policy</u> (4.22)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (4.2)</p> <p>Power BI reports</p> <p>CSC / Board reports</p>	<p>Despite the stated policy and procedure position, for cases marked as resolved in the FY 2023/24, only 49% of Stage 1 and 71% of Stage 2 complaints were responded to in compliance with timescales for both the acknowledgement and response. This performance highlights operational challenges which result in non-compliance with the Code requirements.</p> <p>A Complaints Improvement Action Plan is established and is starting to make progress – for instance showing that cases marked as resolved between 1 April and 20 May 2024, compliance was 77% (Stage 1) and 75% (Stage 2). The progress against the plan is being monitored by CSC and Board.</p> <p><b>ACTION:</b> Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve compliance by end September 2024.</p>	
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	Yes	<p><u>Complaints Policy</u> (4.24)</p> <p>Staff training materials</p>		



	a resident remains unhappy as part of its stage 2 response.		Complaints Procedure May 2024 (4.1)		
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Complaints Policy</u> (4.23) Staff training materials Complaints Procedure May 2024 (4.4)		
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	No	<u>Complaints Policy</u> (4.26) Staff training materials Complaints Procedure May 2024 (4.4) Power BI reports CSC / Board reports	The issues identified above in 6.11 apply here too, and evidence on our response timescales show that despite the stated policy and procedure position, we are not compliant with the Code in respect of response timescales.  <b>ACTION:</b> Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve compliance by end September 2024.	
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	<u>Complaints Policy</u> (4.26) Staff training materials Complaints Procedure May 2024 (4.6) Customer records (Dynamics)	Whilst we have a compliant policy, and are aware that this is happening in practice, we do not currently record agreed extensions of timescales within our CRM in a way that is reasonably easy to access aside from a manual intervention. We therefore additionally cannot confirm that we are providing good reasons, nor that we are providing the contact details of the Ombudsman. This will form part of service improvement actions for system change request to start to collect this data in an alternative way. Once this happens, we plan to start to monitor extensions to identify further service improvements.	
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			

				<b>ACTION:</b> Complete system changes to start to collect this data by end Q2 2024/25	
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.	No	<u>Complaints Policy</u> (4.10) Staff training materials Complaints Procedure May 2024 (4.7) Power BI reports	Our performance of tracking outstanding actions to resolution needs to improve. Reports are provided to business areas (functions) to monitor 'promise dates' to resolution. Non-compliance of promise dates is reported to Director and Executive level for appropriate resolution.  This is a key area of focus for us in 24/25 to improve. The reports we have now provide full visibility of the progress of actions. We will be using this data to drive performance improvements. We anticipate significant improvement in our compliance by September 2024.  <b>ACTION:</b> Continue the progress of the actions contained within the Complaints Improvement Plan and Voluntary Undertaking in order to achieve significant improvement in compliance by end Q2 2024/25.	
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	<u>Complaints Policy</u> (4.12) Staff training materials Complaints Procedure May 2024 (4.7)		
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> </ul>	Yes	Letter templates		

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>				
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p><u>Complaints Policy</u> (4.22)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (4.3)</p>		

## Section 7: Putting things right

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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> </ul>	Yes	<p><u>Complaints Policy</u> (Section 5)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (Section 7)</p> <p>Letter templates</p>		

	<ul style="list-style-type: none"> <li>Changing policies, procedures or practices.</li> </ul>				
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<u>Complaints Policy</u> (5.2) Staff training materials Complaints Procedure May 2024 (Section 8) <u>Compensation Policy</u> (Section 4)		
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	<u>Complaints Policy</u> (5.3) Staff training materials Complaints Procedure May 2024 (Section 8) <u>Compensation Policy</u> Letter templates Power BI reports	As per 6.6 and 6.17 of this self-assessment, we monitor the progression of promise dates made in remedy of a complaint.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<u>Complaints Policy</u> (5.2) Staff training materials Complaints Procedure May 2024 <u>Compensation Policy</u> (1.3)		

## Section 8: Self-assessment, reporting and compliance

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol>	Yes	<p>Annual Complaints Performance and Service Improvement Report 2022/23</p> <p><a href="#"><u>Annual Complaints Performance and Service Improvement Report 2023/24</u></a></p>	<p>The 2022/23 report was approved by Board in June 2023.</p> <p>The 2023/24 report has been approached in a more in-depth way. This was partly as a result of the greater availability of data following steady improvements falling from the Complaints Improvement Plan, but also in recognition as a wider organisation that we needed to take a more critically analytical view of our performance – particularly how we evidence how we say we do things.</p>	
8.2	<p>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.</p>	Yes	<p>Annual Complaints Performance and Service Improvement Report 2022/23</p> <p><a href="#"><u>Annual Complaints Performance and Service Improvement Report 2023/24</u></a></p>	<p>Whilst the 2022/23 report was presented to Board for awareness, the 2023/24 report will be the first time that the Board will be asked to provide a response to the report which will be published on our website.</p>	
8.3	<p>Landlords must also carry out a self-assessment following a significant</p>	Yes		<p>In line with the commentary for 8.1, and our future approach to self-assessment, we will update this self-</p>	

	restructure, merger and/or change in procedures.			assessment as necessary in line with the Code requirements.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		In line with the commentary for 8.1, and our future approach to self-assessment, we will update this self-assessment as necessary in line with the HOS requirements.	
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	<u>Complaints Policy</u> (Section 6)		

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

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (8.2) Staff training materials Power BI reports CSC / Board reports	Operationally this is done through regular monitoring of reports relating to learning, led by the Head of CRS. This is also fed into regular reporting to CSC and Board.	
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	<u>Complaints Policy</u> (2.1, 2.2, 8.3) Staff training materials Power BI reports CSC / Board reports	CSC and Board are updated with learning from complaints and how that is embedded in service improvements. Additionally, we report back wider learning and improvements from complaints to customers through the <u>Customer Annual Report</u> , the	

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	<u>Customer Annual Report</u>	colleague Intranet, as well as the Customer Services Committee and Board	
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	Organisational structure Power BI reports CSC / Board reports	The Head of CRS is appointed as accountable for the organisation's complaint handling. They are responsible for analysing complaints, including performance, trends and risks as well as recommending changes to policies and procedures. The Head of CRS reports to the AD Operational Performance who leads a directorate created in 2023/24, centralising a range of performance-related services which were once spread across the business, emphasises the commitment to streamlining the journey from service failures to service improvements. The AD Operational Performance reports into the Chief Customer Officer (CCO).	
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	Organisational structure	Emma Palmer (Board Member and Chair of CSC) is appointed as the MRC, and accountable to ensuring a positive complaint handling culture is embedded within the organisation.  The MRC is supported in this role by the CCO and AD Operational Performance.	
9.6	The MRC will be responsible for ensuring the governing body receives regular	Yes	Power BI reports CSC / Board reports	The MRC is also the Chair of Customer Services Committee (CSC) where each quarter a KPI report is	

	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.			delivered, known as the performance and assurance (P&A) report, outlining performance on a range of matters, including complaints. Additionally, the Board receives, via CSC, a quarterly report on Customer Voice, which includes a section on complaint handling and performance, in line with the requirements in Code provision 9.7 below.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <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	Organisational structure Power BI reports CSC / Board reports	As Code provision 9.6 above, both CSC and Board received regular updates on complaints data in line with these Code requirements.  The annual complaints performance and service improvement report is presented to board in June of each year, with the next one to be presented in June 2024 for the period 2023/24.	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <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</li> </ul>	Yes	Intranet articles Training videos	The CCO is delivering a campaign to Make Every Contact Count (MECC) which is being rolled out in phases, in recognition of the challenges we face with our systems and processes pending various improvement programmes.  Phase 1 sees a standard objective for all colleagues in relating to recording every contact with customers.	



	<p>complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>Phase 2 will take this a step further in line with Code provision 9.8.</p> <p>The CRS team specifically has objectives around complaint resolution.</p>	
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### Version control

Date	Changes made	Completed by	Approved by	Approved on
5 June 2024	Self-assessment completed for publication with Annual Complaints Performance and Improvement Report 2023/24.	David Birley	Group Board	19 June 2024
27 June 2024	<p>3.1: added live chat to list of ways a customer can make a complaint.</p> <p>Links updated throughout ready for publication.</p>	David Birley	n/a	n/a