

## Appendix A

### Self-assessment form for 2023/2024

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Within policy 2.Definitions and scope 2.1	We follow the Housing Ombudsman definition of a complaint.  A complaint is 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 customer or group of customers
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	Within policy 4. Policy Processing complaints 4.9	Where a member of staff is aware of an area of dissatisfaction or receives a complaint from a customer or customer representative, they must log this as a Stage 1 complaint and acknowledge receipt within 5 working days.
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			A service request can come from a customer or someone who might have visited their home. For example, reporting a repair issue, or to report incidents of anti-social behaviour or other neighbourhood complaints. A service request is not a complaint and will be logged and forwarded to the relevant

	are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Within policy 2.Definitions and scope 2.3	department for action. However, service requests can become formal complaints when, for example a customer is not satisfied with the way their service request has been handled.
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	Within policy 2.Definitions and scope 2.3	A service request is not a complaint and will be logged and forwarded to the relevant department for action. However, service requests can become formal complaints when, for example a customer is not satisfied with the way their service request has been handled.
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	Within policy 2.Definitions and scope 2.4	An expression of dissatisfaction made through a general customer survey is not a complaint.

## 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	Yes	Within Policy 4.Policy	We reserve the right to refuse a complaint in the following circumstances:

	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		Exclusions 4.27	<p>The issue is an initial service request, for example and enquiry or repair request. It duplicates another complaint already made or in the process of investigation. Complaints that have already been taken through our complaints process and concluded will not be re-investigated unless it is a new issue or significant new information becomes available.</p> <p>The issue is an accident or incident. This will be dealt with as a compliance issue through our Health and Safety or other appropriate policy and procedures.</p> <p>There is a Housing Disrepair Protocol in progress.</p> <p>Legal proceedings connected to the claim have commenced</p>
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> </ul>	Yes	Within Policy 4.Policy Exclusions 4.27	<p>We reserve the right to refuse a complaint in the following circumstances:</p> <p>The issue is an initial service request, for example and enquiry or repair request. It duplicates another complaint already made or in the process of investigation. Complaints that have already been taken through our complaints process and concluded will not be re-investigated unless it is a new issue or</p>

	<ul style="list-style-type: none"> <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>			<p>significant new information becomes available.</p> <p>The issue is an accident or incident. This will be dealt with as a compliance issue through our Health and Safety or other appropriate policy and procedures.</p> <p>There is a Housing Disrepair Protocol in progress.</p> <p>Legal proceedings connected to the claim have commenced</p>
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	Within Policy 4.Policy Exclusions 4.26	Early complaints give us the best opportunity to resolve an issue quickly, we will not normally consider a complaint made more than twelve months after the issue of the complaint happened.
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	Within Policy 4.Policy	<p>We reserve the right to refuse a complaint in the following circumstances:</p> <p>The issue is an initial service request, for example and enquiry or repair request. It duplicates another complaint already made or in the process of investigation. Complaints that have already been taken through our complaints process and concluded will not be re-investigated unless it is a new issue or</p>

			<p>Exclusions</p> <p>4.27</p> <p>4.28</p> <p>4.29</p>	<p>significant new information becomes available.</p> <p>The issue is an accident or incident. This will be dealt with as a compliance issue through our Health and Safety or other appropriate policy and procedures.</p> <p>There is a Housing Disrepair Protocol in progress.</p> <p>Legal proceedings connected to the claim have commenced.</p> <p>4.28 For some services there are alternative statutory appeal or tribunal processes in place which must be used rather than the complaints procedure. These services include:</p> <p>Appeals against the refusal of planning permission or planning enforcement.</p> <p>Appeals against statutory notices.</p> <p>Housing benefit appeals.</p> <p>Homelessness decisions.</p> <p>4.29 We will not accept complaints made in a vexatious manner. A vexatious complaint may be:</p> <p>Obsessive, harassing, abusive, malicious or repetitive behaviour.</p>
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				<p>Insisting on unrealistic or unreasonable outcomes.</p> <p>Designed to cause disruption.</p> <p>Demanding redress without serious purpose or merit.</p> <p>This list is not exhaustive. We will always aim to fully understand the perspective of the complainant and gather all available facts so that genuine issues of concern are addressed.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Within Policy 4.Policy Receiving complaints 4.5	<p>We are committed to be fair, accruable and transparent, and to promote equality of opportunity to make sure that all customers are treated fairly. We recognise that our residents may have vulnerabilities, and in considering each complaint we will make reasonable adjustments as required.</p> <p>Customers are free to seek support and advice from other organisations or agencies, and we will signpost to these as appropriate.</p>

### 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	Yes	Within Policy 4.Policy Receiving complaints	Any customer can make a complaint in the way that best suits them. This includes in writing, by email, by webmail, verbally to an officer, by telephone or through social media.

	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.		4.1	(Complaints received by social media will be handled through our usual process and outside of the social media or any other public platform).
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	Within policy 4. Policy Receiving complaints 4.1 Processing complaints 4.9	Any customer can make a complaint in the way that best suits them. This includes in writing, by email, by webmail, verbally to an officer, by telephone or through social media. (Complaints received by social media will be handled through our usual process and outside of the social media or any other public platform).  Where a member of staff is aware of an area of dissatisfaction or receives a complaint from a customer or customer representative, they must log this as a Stage 1 complaint and acknowledge receipt within 5 working days.
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.	NA	NA	No complaints to date
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	Yes	Within Policy 4. Policy Processing complaints	If all or part of the complaint is not resolved to the customer's satisfaction, it will be progressed to Stage 2 of the complaints process.



	will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		Stage 2 complaints 4.13	<p>4.14 All complaints involving a third-party response (for example, a contractor or another organisation working on our behalf) will also be dealt with at Stage 2 of the process, without first being dealt with at Stage 1. We aim to avoid a customer having to make the same complaint to two organisations in all circumstances.</p> <p>4.15 All requests for a Stage 2 complaint must be logged, defined and acknowledged within 5 days of receipt.</p> <p>4.16 A customer may be asked to clearly state why they disagree with a decision and what more they want to put things right but is not obliged to provide this before a further investigation is made.</p> <p>4.17 The person involved at Stage 1 must not be involved in investigation or review of a Stage 2 complaint.</p> <p>4.18 A final response should be provided within 20 days of the acknowledgement.</p>
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				4.19 An extension to this timescale can be considered where the complaint is complex. Any extension must be no more than 20 working days without good reason, and the reason(s) and expected timescale must be clearly explained to the complainant.
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	Within Policy 5. Monitoring and Review 5.4	The Housing Ombudsman has a statutory duty to monitor compliance with the Complaint Handling Code. <sup>1</sup> Each year, we will self-assess our service against the Code and will produce an Annual Complaints and Performance Improvement Report
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	Within Policy 4. Policy Receiving complaints 4.3	Elected members, organisations and people who advocate for other people can also make a complaint on behalf of somebody else, but we must have signed authority from the person concerned to deal with the representative
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	Within Policy 4. Policy	If the complaint remains unresolved at the end of our complaints process, the customer has the following options available:

<sup>1</sup> Housing Ombudsman, Complaint Handling Code 2024, <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>, sourced April 2024.

			Processing complaints Housing Ombudsman 4.20	<p>They can use the Housing Ombudsman's Early Resolution Service. This is an alternative process to formal investigation, where they will work with the customer and us to resolve the dispute as fairly and quickly as possible.</p> <p>The customer can refer their complaint to the Housing Ombudsman for a formal investigation.</p>
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#### 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	Refer to Teign Housing and First Point of Contact	In process of recruiting a Housing Compliance Officer
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	Refer to Housing Compliance Officer governed by JD	

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	Within Policy 5. Monitoring and Review 5.6 5.7	Feedback about our complaints and lessons learned will be provided in our annual report and in customer bulletins and newsletters and will be publicly available on our website. We will review this policy, procedures and any staff training requirement at least every five years to ensure that it continues to operate within best practice, achieve measurable results and to achieve continuous service improvement.
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## 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	Complaints Policy	
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	Within Policy 4. Policy Processing complaints 4.7	Our approach is local resolution of the complaint as soon as possible, with a focus on putting things right.

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	Within Policy 4.Policy Processing complaints 4.7	Our approach is local resolution of the complaint as soon as possible, with a focus on putting things right.
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	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.14	All complaints involving a third-party response (for example, a contractor or another organisation working on our behalf) will also be dealt with at Stage 2 of the process, without first being dealt with at Stage 1. We aim to avoid a customer having to make the same complaint to two organisations in all circumstances.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Within Policy 4.Policy Receiving complaints 4.3	Elected members, organisations and people who advocate for other people can also make a complaint on behalf of somebody else, but we must have signed authority from the person concerned to deal with the representative acting on their behalf, and be sure that the matter is being raised in the best interest of the customer/s concerned.
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	Yes	Within Policy 4.Policy Processing complaints 4.10	An investigation of the issues must be made by the appropriate officer, who will aim to agree an action with the customer to address their concerns and resolve their issues where a complaint is fully or partially upheld. A full response including lessons learned

	any aspect of the complaint is unclear, the resident must be asked for clarification.			and actions taken must be sent to the customer within 10 working days of the acknowledgement.
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	Within Policy 4.Policy Responding to complaints 4.23	<p>We will ensure that all complaints receive a written response, which clearly shows the following;</p> <p>The complaint stage. The complaint definition. The decision on the complaint. The reasons for any decisions made. The details of any remedy offered to put things right. Details of any outstanding actions. Details of how to escalate the matter if the complainant is not satisfied with the response.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>deal with complaints on their merits, act independently, and have an open mind;</li> <li>give the resident a fair chance to set out their position;</li> <li>take measures to address any actual or perceived conflict of interest; and</li> </ol>	Yes	Within Policy 1.Purpose 1.2	This policy ensures that when customers contact us with a complaint or to tell us they are not satisfied with any aspect of our services, we have a clear and straightforward process to investigate the issue thoroughly, to make things right, and to avoid problems in the future.

	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	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.19	An extension to this timescale can be considered where the complaint is complex. Any extension must be no more than 20 working days without good reason, and the reason(s) and expected timescale must be clearly explained to the complainant
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	Within Policy 4.Policy Receiving complaints 4.5	We are committed to be fair, accruable and transparent, and to promote equality of opportunity to make sure that all customers are treated fairly. We recognise that our residents may have vulnerabilities, and in considering each complaint we will make reasonable adjustments as required. Customers are free to seek support and advice from other organisations or agencies, and we will signpost to these as appropriate.
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	Within Policy 4.Policy Exclusions 4.27 4.28 4.29	We reserve the right to refuse a complaint in the following circumstances:  The issue is an initial service request, for example and enquiry or repair request. It duplicates another complaint already made or in the process of investigation. Complaints that have already been taken through our complaints process and concluded will not be re-investigated unless it is a new issue or

				<p>significant new information becomes available.</p> <p>The issue is an accident or incident. This will be dealt with as a compliance issue through our Health and Safety or other appropriate policy and procedures.</p> <p>There is a Housing Disrepair Protocol in progress.</p> <p>Legal proceedings connected to the claim have commenced.</p> <p>4.28 For some services there are alternative statutory appeal or tribunal processes in place which must be used rather than the complaints procedure. These services include:</p> <p>Appeals against the refusal of planning permission or planning enforcement.</p> <p>Appeals against statutory notices.</p> <p>Housing benefit appeals.</p> <p>Homelessness decisions.</p> <p>4.29 We will not accept complaints made in a vexatious manner. A vexatious complaint may be:</p> <p>Obsessive, harassing, abusive, malicious or repetitive behaviour.</p>
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				<p>Insisting on unrealistic or unreasonable outcomes.</p> <p>Designed to cause disruption.</p> <p>Demanding redress without serious purpose or merit.</p> <p>This list is not exhaustive. We will always aim to fully understand the perspective of the complainant and gather all available facts so that genuine issues of concern are addressed.</p>
5.12	<p>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.</p>	Yes	<p>Within Policy 5. Monitoring and Review 5.2 5.5</p>	<p>We will log all complaints on a database to provide tracking information on the progress of individual complaints and to extract key performance indicators.</p> <p>Key performance indicators will be reported to our Governing Body and to the Regulator of Social Housing as appropriate, and at least annually. Indicators will include but may not be limited to those required under the Tenant Satisfaction Measures published by the Regulator.<sup>2</sup></p>
5.13	<p>Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints</p>	Yes		<p>Where a complaint is fully or partially upheld at either Stage 1 or Stage 2, a range</p>

<sup>2</sup>Regulator of Social Housing, *Regulatory Standards for Landlords*, <https://www.gov.uk/government/collections/transparency-influence-and-accountability-including-tenant-satisfaction-measures>, accessed April 2024.

	process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		Within Policy 4. Policy Processing Complaints 4.21	<p>of actions may be taken. These include but may not be limited to:</p> <p>An officer contacts the complainant to discuss the issue and explain any actions proposed.</p> <p>An apology and acknowledgement of where things have gone wrong is offered to the complainant.</p> <p>A decision is reconsidered or changed.</p> <p>A record is amended or corrected.</p> <p>A policy, procedure or practice is reviewed and changed.</p> <p>An issue is dealt with and concluded – for example a repair is carried out or completed.</p> <p>Financial compensation is offered to recompense for any inconvenience, distress or material losses caused.</p>
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	ASB Policy and Procedure	Available on request
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	Within Policy	<p>This Policy also complies with other relevant legislation including:</p> <p>Localism Act 2011.</p> <p>Housing Act 1996 (schedule 2).</p> <p>General Data Protection Act 2018.</p>

	for the provisions of the Equality Act 2010.		3. Legal and Regulatory Requirements 3.3	Equality Act 2010. Social Housing (Regulation) Act 2023.
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## 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	Within Policy 4.Policy Processing complaints 4.7	Our approach is local resolution of the complaint as soon as possible, with a focus on putting things right.
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	Within Policy 4.Policy Processing complaints 4.9	Where a member of staff is aware of an area of dissatisfaction or receives a complaint from a customer or customer representative, they must log this as a Stage 1 complaint and acknowledge receipt within 5 working days.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working</u></b>	Yes	Within Policy 4.Policy	An investigation of the issues must be made by the appropriate officer, who will aim to agree an action with the customer to address

	<u>days</u> of the complaint being acknowledged.		Processing complaints 4.10	their concerns and resolve their issues where a complaint is fully or partially upheld. A full response including lessons learned and actions taken must be sent to the customer within 10 working days of the acknowledgement.
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	Within Policy 4.Policy Processing complaints 4.11	Where the investigation is complex, the response time may be extended by a further 10 working. Reasons for the extension must be clearly explained to the complainant, with information on how to contact the Housing Ombudsman. Responses must be made within the extended timescale unless there are exceptional circumstances
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	Within Policy 4.Policy Processing complaints 4.11	Reasons for the extension must be clearly explained to the complainant, with information on how to contact the Housing Ombudsman. Responses must be made within the extended timescale unless there are exceptional circumstances
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	Within Policy 4.Policy Responding to complaints 4.23	We will ensure that all complaints receive a written response, which clearly shows the following;  The complaint stage. The complaint definition. The decision on the complaint. The reasons for any decisions made.

				<p>The details of any remedy offered to put things right.</p> <p>Details of any outstanding actions.</p> <p>Details of how to escalate the matter if the complainant is not satisfied with the response.</p> <p>Outstanding actions will be clearly shown within the written response.</p>
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	Within Policy 4.Policy Responding to complaints 4.23	<p>We will ensure that all complaints receive a written response, which clearly shows the following;</p> <p>The complaint stage.</p> <p>The complaint definition.</p> <p>The decision on the complaint.</p> <p>The reasons for any decisions made.</p> <p>The details of any remedy offered to put things right.</p> <p>Details of any outstanding actions.</p> <p>Details of how to escalate the matter if the complainant is not satisfied with the response.</p>
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	Yes	Within Policy 4.Policy Processing complaints 4.12	Additional complaints raised within the investigation period will be included in the same complaint unless they are unrelated or will unreasonably delay the outcome of the complaint. In such instances they will be logged as a separate complaint.

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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	Within Policy 4.Policy Responding to complaints 4.23	<p>We will ensure that all complaints receive a written response, which clearly shows the following;</p> <p>The complaint stage. The complaint definition. The decision on the complaint. The reasons for any decisions made. The details of any remedy offered to put things right. Details of any outstanding actions. Details of how to escalate the matter if the complainant is not satisfied with the response.</p>

## 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.	Yes	Within Policy 4.Policy Processing complaints	If all or part of the complaint is not resolved to the customer's satisfaction, it will be progressed to Stage 2 of the complaints process.

	Stage 2 is the landlord's final response.		Stage 2 complaints 4.13	
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	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.15	All requests for a Stage 2 complaint must be logged, defined and acknowledged within 5 days of receipt.
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	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.16	A customer may be asked to clearly state why they disagree with a decision and what more they want to put things right but is not obliged to provide this before a further investigation is made.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.17	The person involved at Stage 1 must not be involved in investigation or review of a Stage 2 complaint.
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	Within Policy 4.Policy	A final response should be provided within 20 days of the acknowledgement

			Processing complaints Stage 2 complaints 4.18	
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	Within Policy 4.Policy Processing complaints Stage 2 complaints 4.19	An extension to this timescale can be considered where the complaint is complex. Any extension must be no more than 20 working days without good reason, and the reason(s) and expected timescale must be clearly explained to the complainant.
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	Within Policy 4.Policy Processing complaints Stage 1 complaints 4.11	Where the investigation is complex, the response time may be extended by a further 10 working. Reasons for the extension must be clearly explained to the complainant, with information on how to contact the Housing Ombudsman. Responses must be made within the extended timescale unless there are exceptional circumstances.
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	Yes	Within Policy 4.Policy Processing complaints 4.23	We will ensure that all complaints receive a written response, which clearly shows the following;  The complaint stage. The complaint definition. The decision on the complaint. The reasons for any decisions made.



	appropriate updates provided to the resident.			<p>The details of any remedy offered to put things right.</p> <p>Details of any outstanding actions.</p> <p>Details of how to escalate the matter if the complainant is not satisfied with the response.</p>
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	<p>Within Policy</p> <p>4.Policy</p> <p>Responding to complaints</p> <p>4.23</p>	<p>We will ensure that all complaints receive a written response, which clearly shows the following;</p> <p>The complaint stage.</p> <p>The complaint definition.</p> <p>The decision on the complaint.</p> <p>The reasons for any decisions made.</p> <p>The details of any remedy offered to put things right.</p> <p>Details of any outstanding actions.</p> <p>Details of how to escalate the matter if the complainant is not satisfied with the response.</p>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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> </ul>	Yes	<p>Within Policy</p> <p>4.Policy</p> <p>Responding to complaints</p> <p>4.23</p> <p>4.24</p>	<p>We will ensure that all complaints receive a written response, which clearly shows the following;</p> <p>The complaint stage.</p> <p>The complaint definition.</p> <p>The decision on the complaint.</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>			<p>The reasons for any decisions made.</p> <p>The details of any remedy offered to put things right.</p> <p>Details of any outstanding actions.</p> <p>Details of how to escalate the matter if the complainant is not satisfied with the response.</p> <p>Clear guidance will be included to explain how customers can escalate a complaint if they remain dissatisfied.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Within Policy 4. Policy Housing Ombudsman 4.20</p>	<p>If the complaint remains unresolved at the end of our complaints process, the customer has the following options available:</p> <ul style="list-style-type: none"> <li>i. They can use the Housing Ombudsman's Early Resolution Service. This is an alternative process to formal investigation, where they will work with the customer and us to resolve the dispute as fairly and quickly as possible.</li> <li>ii The customer can refer their complaint to the Housing Ombudsman for a formal investigation.</li> </ul>

## 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	Within Policy 4.Policy Actions from complaints 4.21	<p>Where a complaint is fully or partially upheld at either Stage 1 or Stage 2, a range of actions may be taken. These include but may not be limited to:</p> <p>An officer contacts the complainant to discuss the issue and explain any actions proposed.</p> <p>An apology and acknowledgement of where things have gone wrong is offered to the complainant.</p> <p>A decision is reconsidered or changed.</p> <p>A record is amended or corrected.</p> <p>A policy, procedure or practice is reviewed and changed.</p> <p>An issue is dealt with and concluded – for example a repair is carried out or completed.</p> <p>Financial compensation is offered to recompense for any inconvenience, distress or material losses caused.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Within Policy 4.Policy Actions from complaints 4.22	Compensation and redress offered will be in line with the <i>Housing Ombudsman Compensation Policy – Guidance for Landlords</i> and will reflect the impact of the incident on the customer.
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes	Within Policy	Where a complaint is fully or partially upheld at either Stage 1 or Stage 2, a range of

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.		4.Policy Actions from complaints 4.21	<p>actions may be taken. These include but may not be limited to:</p> <p>An officer contacts the complainant to discuss the issue and explain any actions proposed.</p> <p>An apology and acknowledgement of where things have gone wrong is offered to the complainant.</p> <p>A decision is reconsidered or changed.</p> <p>A record is amended or corrected.</p> <p>A policy, procedure or practice is reviewed and changed.</p> <p>An issue is dealt with and concluded – for example a repair is carried out or completed.</p> <p>Financial compensation is offered to recompense for any inconvenience, distress or material losses caused.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Within Policy 4.Policy Actions from complaints 4.22	<p>Compensation and redress offered will be in line with the <i>Housing Ombudsman Compensation Policy – Guidance for Landlords</i> and will reflect the impact of the incident on the customer.</p>

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the	Yes	Within Policy 5. Monitoring and Review 5.3 5.4 5.6	<p>The number of complaints received and handled within Complaint Handling Code timescales will be reported annually to the Regulator of Housing in accordance with any reporting requirements set.<sup>3</sup></p> <p>5.4 The Housing Ombudsman has a statutory duty to monitor compliance with the Complaint Handling Code.<sup>4</sup> Each year, we will self-assess our service against the Code and will produce an Annual Complaints and Performance Improvement Report.</p> <p>5.6 Feedback about our complaints and lessons learned will be provided in our annual report and in customer bulletins and newsletters and will be publicly available on our website.</p>

<sup>3</sup> Gov.uk, *Regulatory Standards for Landlords, Tenant Satisfaction Measures – Technical Requirements CH01 and CH02*, <https://www.gov.uk/government/publications/tenant-satisfaction-measures-technical-requirements#perception>, sourced April 2024.

<sup>4</sup> Housing Ombudsman, Complaint Handling Code 2024, <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>, sourced April 2024.

	Ombudsman in relation to the work of the landlord.			
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	Within Policy 5. Monitoring and Review 5.5 5.6	<p>Key performance indicators will be reported to our Governing Body and to the Regulator of Social Housing as appropriate, and at least annually. Indicators will include but may not be limited to those required under the Tenant Satisfaction Measures published by the Regulator.<sup>5</sup></p> <p>Feedback about our complaints and lessons learned will be provided in our annual report and in customer bulletins and newsletters and will be publicly available on our website.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Within Policy 5. Monitoring and Review 5.8	The policy and all associated procedures will alternatively be reviewed immediately following any change to government policy, regulation or legislation, or as operational issues require.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Within Policy 5. Monitoring and Review 5.4	The Housing Ombudsman has a statutory duty to monitor compliance with the Complaint Handling Code. <sup>6</sup> Each year, we will self-assess our service against the Code and will produce and Annual Complaints and Performance Improvement Report.

<sup>5</sup>Regulator of Social Housing, *Regulatory Standards for Landlords*, <https://www.gov.uk/government/collections/transparency-influence-and-accountability-including-tenant-satisfaction-measures>, accessed April 2024.

<sup>6</sup> Housing Ombudsman, Complaint Handling Code 2024, <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>, sourced April 2024.

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	Within Policy 5. Monitoring and Review 5.8	The policy and all associated procedures will alternatively be reviewed immediately following any change to government policy, regulation or legislation, or as operational issues require.
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## 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	Within Policy 1. Purpose 1.4	It ensures we monitor complaints, to ensure we learn from them, improve our learning where we can, to improve our services, practices and procedures.
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	Within Policy 1. Purpose 1.5	It helps to ensure we have a positive approach to receiving complaints, that we resolve complaints in a timely fashion, and that we are open and accountable to our customers.
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	Yes	Within Policy 5. Monitoring and Review 5.5 5.6	Key performance indicators will be reported to our Governing Body and to the Regulator of Social Housing as appropriate, and at least annually. Indicators will include but may not be limited to those required under the

	stakeholders, such as residents' panels, staff and relevant committees.			Tenant Satisfaction Measures published by the Regulator. <sup>7</sup>  5.6 Feedback about our complaints and lessons learned will be provided in our annual report and in customer bulletins and newsletters and will be publicly available on our website.
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	Part of the Housing Enabling and Development Manager role	
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	Housing and Homelessness Portfolio Holder	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's	Yes	Housing and Homelessness Portfolio Holder	Monthly PH meetings held with Head of Housing

<sup>7</sup>Regulator of Social Housing, *Regulatory Standards for Landlords*, <https://www.gov.uk/government/collections/transparency-influence-and-accountability-including-tenant-satisfaction-measures>, accessed April 2024.



	complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.			
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	Quarterly Reports to Overview and Scrutiny Committee	
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</li> </ul>	Yes	Complaints Procedure	

	complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			
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