**Section 1: Definition of a complaint**

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| **Code**  **Provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/**  **Explanation** |
| **1.2** | A  complaint must be defined as:  ‘an expression of dissatisfaction, however made , about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’ | **yes** | **Complaints**  **Policy** | **Our current complaints policy uses the HOS definition** |
| **1.3** | A resident does not have to use the word ’complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction we must give them the choice to make a complaint. A complaint that is submitted via a third party or representative will be handled in line with our complaints policy. | **Yes** | **Complaints Policy** | **Relevant staff have been trained in 2024** |
| **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** | **Complaints policy** | **The policy reflects this requirement** |
| **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. We will not stop efforts to address the service request if the resident complains. | **Yes** | **Complaints Policy** | **The policy guidance reflects this requirement** |
| **1.6** | an expression of dissatisfaction with services made through a survey is not defined as a complaint, though whenever 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 our services, we will also provide details of how you as a resident can complain. | **Yes** | **Not applicable** | **We will adopt this approach in any of our future surveys** |

**Section 2: Exclusions**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/explanation** |

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| **2.1** | Landlords must accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint we must be able to evidence our reasoning. Each complaint will be considered on its own merits | **Yes** | **Complaints policy** | **All complaints are assessed in line with the complaints policy** |
| **2.2** | Our complaints policy sets out the circumstances in which a matter will not be considered as a complaint or escalated. | **Yes** | **Complaints policy** | **This is incorporated into our complaints policy** |
| **2.3** | We will accept complaints referred to us within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. We will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so | **Yes** | **Complaints policy** | **The complaints policy deals with this** |
| **2.4** | If we decide not to accept a complaint an explanation will 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 us to take on the complaint. | **Yes** | **Complaints policy**  **Complaints register** | **If a complaint is not accepted, the complainant is provided a reason in writing and a record kept.** |
| **2.5** | We will consider the individual circumstances of each and every complaint. | **Yes** | **Complaint record keeping** | **The individual circumstance of each complaint is considered.** |

**Section 3: Accessibility and awareness**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/ explanation** |

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| **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** | **Complaints policy**  **Website** | **Complaint handling information is shared on our website** |
| **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** | **Complaints policy**  **Complaints record**  **Staff training record** | **All staff are trained** |
| **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** | **Complaint records**  **Complaint quarterly reporting to the board** | **Complaint information, including numbers are reported to board** |

**Section 4: Complaint handling staff**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/ explanation** |

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| **4.1** | Elizabeth Gamage, Clerk and Receiver will be 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 Miss Gamage as the ‘complaints officer’. | **Yes** | **Complaints policy** | **This is part of the role of the clerk** |
| **4.2** | The complaints officer will have access to staff at all levels to facilitate the prompt resolution of complaints. We will also have the authority and autonomy to act to resolve disputes promptly and fairly | **Yes** | **Complaints policy** | **This is part of the role of the clerk** |
| **4.3** | All staff will be suitably trained in the importance of complaint handling. We see complaints as a core service and we will be resourced to handle complaints effectively. | **Yes** | **Complaints policy**  **Complaints record**  **Staff training record** | **Staff training** |

**Section 5: The complaint handling process**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/ explanation** |

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| **5.1** | Our complaints policy deals with complaints covered by this code. Residents will not be treated differently if they complain | **Yes** | **Complaints policy** | **Only one policy in place** |
| **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.  We will aim to resolve your complaint quickly and effectively to ensure an early resolution can be reached. | **Yes** | **Complaints policy** | **Staff trained** |
| **5.3** | We are responsible for ensuring that any third parties handle complaints in line with the code | **Yes** | **Complaints policy** | **The complaints policy has two stages only** |
| **5.4** | When a complaint is logged at a stage 1 or escalated to stage 2, we will set out our 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** | **Complaints policy** | **If a third party Is required/appointed, they would be expected.** |
| **5.5** | When a complaint is acknowledged at either stage, we will be clear which aspects of the complaint we are, and we are not, responsible for and clarify any areas where this is not clear. | **Yes** | **Complaints policy** |  |
| **5.6** | At each stage of the complaints process, we will  a. deal with complaints on their merits, act independently, and have an open mind  b. give the resident a fair chance to set out their position  c. take measures to address any actual or perceived conflict of interest  d. consider all relevant information and evidence carefully | **Yes** | **Complaints policy** | **Written confirmation is sent to the complainant** | |
| **5.7** | Where a response to a complaint will fall outside the timescales set out in this code, we will agree with the resident suitable intervals for keeping them informed about their complaint | **Yes** | **Complaints policy** | **All complaints acknowledged in writing** | |
| **5.8** | We will make reasonable adjustments for residents where appropriate under the equality act 2010. We will 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** | **Complaints policy**  **Staff training** | **All complaints are processed internally** | |
| **5.9** | We will not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. We will clearly set out these reasons and will comply with the provisions set out in section 2 of this code. | **Yes** | **Complaints policy**  **Staff training** | **Holding letters are issued with clear timelines** | |
| **5.10** | A full record will be kept of the complaint, and the outcomes of each stage. This will 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** | **Complaints register** | **This will be actioned if applicable** | |
| **5.11** | We will have processes in place to ensure a complaint can be remedied at any stage of its complaint process. We will ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | **Yes** | **Complaints policy** | **accepted** | |
| **5.12** | We will have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. We will be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | **Yes** | **Complaint file** | **All complaints are noted accordingly** | |
| **5.13** | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | **Yes** | **Complaints policy**  **Training** | **Staff training** | |

**Section 6: Complaints stages**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/ explanation** |

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| **6.1** | We will have processes in place to consider which complaints can be responded to as early as possible which require further investigation. We will 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** | **Complaints policy**  **Staff training** | **Staff training covers this** | |
| **6.2** | We will 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** | **Complaints policy** | **Our complaints register sets out timescales** |
| **6.3** | When we inform a resident about an extension to these timescales we will provide you with contact details of the Ombudsman. | **Yes** | **Complaints policy** | **Timelines set out in policy** |
| **6.4** | A complaint response will be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issues are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident. | **Yes** | **Complaints policy** | **Covered in staff training** |
| **6.5** | We will 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** | **Complaints policy** | **Detailed in complaints policy** |
| **6.6** | 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, the new issues are unrelated to the issues already being investigated or it would unreasonably delay response, the new issues must be logged as a new complaint. | **Yes** | **Complaint register**  **Board reporting** | **Written responses issued within the prescribed timeframes** |
| **6.7** | We will confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage  b. the complaint definition  c. the decision on the  complaint  d. the reasons for any decision made  e. the details of any remedy offered to put thing right  f. details of any outstanding actions  g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response | **Yes** | **Written response letters** | **This is addressed in the correspondence** |
| **6.8** | 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 our procedure. Stage 2 is the our final response. | **Yes** | **Complaints policy** | **Additional complaints are assessed and recorded appropriately** |
| **6.9** | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure  **within 5 working days** of the escalation request being received. | **Yes** | **Response letters** |  |
| **6.10** | Residents must not be required to explain their reasons for requesting a stage 2 consideration. We are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | **Yes** | **Complaints policy** | **Cases are escalated as per the code** |
| **6.11** | The person considering the complaint at stage 2 will be the same person that considered the complaint at stage 1. | **Yes** | **Complaints policy** | **Stage 2 data is recorded and a senior staff member is allocated to respond** |
| **6.12** | We will issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | **Yes** | **Written responses** | **We would not ask residents for an explanation** |
| **6.13** | We will decide whether an extension to this timescale is needed when considering the complexity of the complaint and the 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** | **Compliment concerns and complaints policy** | **There is a separate case allocation in place for stage 2 complaints** |
| **6.14** | When we inform a resident about an extension to these timescales we will provide the contact details of the Ombudsman. | **Yes** | **Complaints policy** | **Set out in policy** |
| **6.15** | A complaint response will 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** | **Complaints policy** | **Staff training** |
| **6.16** | We will 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** | **Complaints policy** | **Staff trained** |
| **6.17** | We will confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage  b. the complaint definition  c. the decision on the complaint  d. the reasons for any decisions being made  e. the details of any remedy offered to put things right  f. details of any outstanding actions  g. details of how to escalate the matter to the Ombudsman service if the individual remains dissatisfied | **Yes** | **Complaint register** | **Written responses are issued within the prescribed timeframe** |
| **6.18** | Stage 2 is our final response and must involve all suitable staff members needed to issue such a response. | **Yes** | **Response letters** | **Dealt with in correspondance** |

**Section 7: Putting things right**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence** | **Commentary/explanation** |

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| **7.1** | Where something has gone wrong we will acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These include:   * Apologising * Acknowledging where things have gone wrong * Providing an explanation, assistance, or reasons * Taking action if there has been a delay * Reconsidering or changing a decision * Amending a record or adding a correction or addendum * Providing a financial remedy * Changing policies, procedures, or practices | **Yes** | **Complaints policy** | **Covered in staff training** |
| **7.2** | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | **Yes** | **Complaints policy** | **All remedial action agreed and approved by senior staff member and reported to board** |
| **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** | **Complaints register**  **Board reporting** | **Complaints are monitored** |
| **7.4** | We will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | **Yes** | **Complaints policy**  **Board reporting** |  |

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

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| **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 insure they are compliant in 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 Ombudsman in relation to the work of the landlord** | **Yes** | **Website** | **Complaint handling reported to board quarterly** |
| **8.2** | **The annual complaints performance and service improvement report must be reported to the landlords governing body (or equivalent) and published on the section of its website relating to complaint. The governing body’s response to the report must be published along side this** | **Yes** | **Annual complaints & performance improvement report published on website** | **Included board response** |
| **8.3** | **Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures** | **Yes** | **Not applicable** | **Not applicable** |
| **8.4** | **Landlords may be asked to review and update the self-assessment following an Ombudsman investigation** | **Yes** | **Not applicable** | **Not applicable** |
| **8.5** | **If a landlord is unable to comply with the code due to exceptional circumstances, such as 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** | **Not applicable** | **Not applicable** |

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

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| **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** | **Annual Complaints & performance improvement Report**  **Quarterly reports to Board** | **Service improvement measures are identified and actions put in place** |
| **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** | **Annual Complaints & performance improvement Report**  **Quarterly reports to Board** | **We use complaints as a valuable resource to learn** |
| **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** | **Trustee meeting** | **Limited accesability** |
| **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** | **Complaints policy** | **The Clerk** |
| **9.5** | **In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for the complaints to support a positive complaint handling culture. This person is referred to as the member Responsible for Complaints (“the MRC”)** | **Action** | **Complaints policy** | **To be actioned** |
| **9.6** | **The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord’s complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings** | **Yes** | **Reporting and minutes** | **Reported to board or trustees** |
| **9.7** | **As a minimum, the MRC and the governing body (or equivalent) must receive:**  **a. regular updates on the volume categories and outcomes of complaints, alongside complaint handling performance**  **b. regular reviews of issues and trends arising from complaint handling.**  **c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to serve maladministration findings; and**  **d. annual complaints performance and service improvement report** | **Yes** | **Minutes and meetings** | **Reported quarterly to board** |
| **9.8** | **Landlords must have a standard objective in relation to compliant handling for all relevant employees or third parties that reflects the need to:**  **a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;**  **b. take collective responsibility for any shortfalls , rather than blaming others;**  **c. act within the professional standards for engaging with complaints as set by any relevant professional body** | **Partial** | **Training records** |  |
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