



## Housing Ombudsman Complaint Handling Code

### Self-Assessment Form: Accent Housing

This self-assessment has been completed by the Complaints Performance Manager. It demonstrates our compliance with the Housing Ombudsman's Complaint Handling Code (2024) and our commitment to ensuring that our complaint handling is in line with Housing Ombudsman requirements.

The icons below are used to show where we meet, partially meet or do not meet the requirements of the Code.

We have developed an action plan to ensure that any areas of non-compliance are addressed.

Links to the policies referenced in this self-assessment can be found here:

[2024-06-27-complaints-and-compensation-policy-v13.pdf \(accentgroup.org\)](#)

[2024-06-27-unacceptable-behaviour-policy-v10.pdf \(accentgroup.org\)](#)

[equity-diversity-and-inclusion-policy-030423-v20.pdf \(accentgroup.org\)](#)

	We meet the requirement
	We almost meet the requirement
	We do not meet the requirement

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / action required
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>		The Housing Ombudsman's complaint definition is clearly stated in section 2 of the Complaints and Compensation Policy:  <b>" Definitions</b> A complaint is defined as 'an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.' (The Housing Ombudsman's Complaint Handling Code)."	
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.		Section 3 of the Complaints Handling Procedure states:  <b>"Important</b> – a customer does not have to say they want to make a complaint for the issue to be dealt with in line with our complaints process. Colleagues should understand the difference between a complaint and a service request."	This is included in our complaints training under complaint handling principles.

			Section 6.1 of the Complaints and Compensation Policy states: <i>"A customer does not have to use the word 'complaint' for it to be treated as such."</i>	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		<p>This is explained in our policy and procedure and has been embedded in complaints training. Section 3 of our complaints and compensation policy states:</p> <p><i>"A service request is defined as 'a request from a resident to their landlord requiring action to be taken to put something right'. (The Housing Ombudsman's Complaint Handling Code). We do not class service requests as complaints."</i></p> <p>Service requests are logged and monitored.</p>	Analysis of stage 1 complaints has confirmed that service requests that are complaints are treated as complaints, in line with our policy.
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.		We would not stop addressing a service request if the customer complained about our response to their service request. We would work to resolve any issues and deal with the complaint in line with our complaints policy.	

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.		We use Rant and Rave to collect customer feedback and satisfaction scores for different areas of service, including complaint handling.	An opportunity to further improve this will be contacting customers to understand the drivers of their dissatisfaction and take this learning into our continuous improvement programme. We are also reviewing how we use Rant and Rave to ensure it is more closely aligned to the key services that form part of the new TSMs, to give us in-year feedback from service users on how we are delivering these services.
-----	--	--	---	--

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / action required
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		Exclusions are explained in section 6.3 of our complaints and compensation policy, which also explain that: "We will accept a complaint unless there is a valid reason not to do so".	
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		This is explained in section 6.3 of our complaints and compensation policy under 'exclusions'.	We have updated our policy and procedure to reflect the extension from 6 months to 12 months.

	<p>residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>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.</p>		<p>Section 6.3 of our complaints and compensation policy states:</p> <p><i>"We cannot accept complaints in the following circumstances: The complaint relates to something that happened more than <b>12 months</b> before we received the complaint. We may extend this in exceptional cases, where there were mitigating circumstances that led to the delay in reporting the complaint.</i></p>	<p>We have updated our policy and procedure to reflect the extension from 6 months to 12 months.</p>
2.4	<p>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</p>		<p>We have included this as a procedural issue with a requirement to follow up in writing any decision not to</p>	<p>During 2024, we are adapting our training to ensure that all staff are aware of this and are currently restructuring our team to have a centralised complaints</p>

	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.		accept a complaint so we can provide evidence if required.	resolution team, to strengthen compliance in this area.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Section 6.3 of our complaints and compensation policy states:  <i>"We will deal with all customer complaints fairly and impartially and will consider each complaint on its own merits. We will not take a blanket approach to excluding complaints and will always consider the individual circumstances of the customer and their complaint."</i>	We have updated our policy and procedure to reflect this.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.		The various ways in which customers can complain are explained in section 6.1 of our policy 'How to Make a Complaint'.	This information is available on our website when customers contact us and through in-person contact with our housing partners.

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.		This is explained in section 6.1 of our policy ' <i>How to Make a Complaint</i> '.	When we receive complaints through social media, complaints are redirected to the complaints resolution team.  We are retraining all relevant staff in 2024 and this will form part of the training.
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.		This is explained in our staff training and in our policy wording. Our culture is to see complaints as an opportunity to improve our service delivery and this is embedded in our training to all staff. Section 1 of our complaints and compensation policy states:  <i>"We use customer complaints as an opportunity to understand why things go wrong and to improve our services. We encourage customers to use our complaints policy when we get things wrong, and this policy sets out how we will respond to complaints and what we will do to put things right."</i>	We are retraining all relevant staff in 2024 and this will form part of the training.

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.		<p>Our policy is published on our website and hard copies are provided to customers on request. Each stage of the process is explained in the policy wording.</p> <p>The accessibility statement on our website explains the following functionality to maximise accessibility for our customers:</p> <ul style="list-style-type: none"> <li>• zoom in up to 300% without problems in most browsers.</li> <li>• navigate most of the website using just a touchpad.</li> <li>• navigate most of the website using speech recognition software.</li> <li>• access text to speech with built in access to Browsealoud.</li> <li>• enable high contrast pages and fonts.</li> <li>• use most of the website using a screen reader.</li> </ul>	We have updated our response timescales to reflect recent changes to the complaint handling code.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		<p>This is included in section 1 of our complaints and compensation policy:</p> <p><i>"The policy can be found on our website, along with information about the Housing Ombudsman Service, the Complaint Handling Code and our self-assessment against the Code.</i></p>	We are implementing additional ways of promoting our complaints policy and the Housing Ombudsman Service, including in our newsletters to customers and annual report to customers.

			<i>We will provide copies of the of the policy on request."</i>	
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.		Section 6.2 of our complaints and compensation policy states:  <i>"We will accept complaints made by a third party on behalf of a customer, but we will check that third party has the customer's authority to act on their behalf. Customers may be represented or accompanied at any meeting with us."</i>	We are retraining all relevant staff in 2024 and this will form part of the training.
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.		Section 7 of our complaints and compensation policy provides information about the Housing Ombudsman service and their contact details.	We are implementing additional ways of promoting our complaints policy and the Housing Ombudsman Service, including in our newsletters to customers and annual report to customers.

#### 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		We have a dedicated customer liaison team responsible for handling all property services complaints. The Complaints Performance Manager is responsible for complaints oversight and	The Housing Ombudsman Service has indicated a potential increase of between 50% to 80% in complaints received by landlords during 2024/25.

	as the 'complaints officer'. This role may be in addition to other duties.		reporting performance to the Board and Customer Experience Committee and is the main point of contact with the Housing Ombudsman Service.	To prepare for this we are introducing a larger, centralised complaints resolution team and in particular investing in the management of this team to ensure timely and quality responses to customers and to capture more effectively any opportunities to improve our service delivery. The new team should be fully established by September 2024.
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.		The Complaints Performance Manager has access to staff at all levels of the organisation. We have created a new role Director of Customer Relations to further strengthen our approach to this area.	As part of the shift to a centralised complaints resolution team, we have also invested in a head of service and two managers in the team who will ensure timely and quality responses to customers and capture more effectively any opportunities to improve our service delivery. A new service improvement forum with senior leads across the business will be operational from September 2024.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant		Whilst we meet this standard, we recognise there is more to do to fully embed a culture of learning	We are retraining all relevant staff in 2024 and

	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		from complaints. This reflects the significant changes in management we have made across 2023/24.	this will form part of the training.
--	---	--	---	--------------------------------------

## 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.		We have one Complaints Policy which covers all customer complaints.	Analysis of complaints received during 2023/24 does not demonstrate that customers feel that they are being treated differently if they make a complaint.
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.		Early resolution is not part of our formal complaints process. Separate processes exist for the logging and monitoring of issues that are not considered to be formal complaints.	We reviewed our policy in April 2023, to align with the Complaint Handling code. We removed 'early resolution' from our complaints stages and moved to a two-stage process.
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.		We have a two-stage process, which is clearly explained in section 6 of our policy.	
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		Third parties (eg contractors) will be consulted as part of our complaint investigation, where any service failure lies with them.	

	part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.		This would be part of our internal process and no complaints go directly from the customers to our suppliers.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		We would handle any complaints relating to a third party (eg contractor) in line with our complaints policy and the Code.	
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.		Complaints handlers are required to speak to customers, so they fully understand the reason for the complaint. Our template letters have been designed to ensure that our understanding of the customer's complaint is included in our acknowledgement and response letters.	In 2024/25 we are launching a quality assurance framework which will drive a consistent approach to customer care and complaint handling. This will be fully embedded by September 2024.
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.		All aspects of the complaint are listed in our acknowledgement and response letters and responded to in turn. If any aspect of the complaint is about something that falls outside of our responsibility, this is explained in our correspondence.	
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> </ul>		This is set out in our policy and guidance to staff.	The investment in the management structure to support a larger centralised complaints resolution team will provide further quality

	<ul style="list-style-type: none"> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			assurance that all complaints are dealt with appropriately and on their merits.
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.		Section 6 of our policy explains that we may need to extend our response timescales in some circumstances, in agreement with the customer.	
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.		<p>We record customers' disabilities/vulnerabilities on our housing management system, along with any adjustments necessary to help them to access our services. These are reviewed in line with our guidance. We recognise that there is more work to be done to ensure our records are kept up to date, particularly around vulnerabilities.</p> <p>In the short term, to mitigate this, complaint handlers are collecting this information when they contact customers in regard to their complaint.</p>	To further strengthen our understanding of our customers we are undertaking a customer data project in 2024, to update and refresh the details that we hold.
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		We would not refuse to escalate a complaint unless there was a valid reason to do so as explained in the 'exclusions' section of our policy. We will	

	must comply with the provisions set out in section 2 of this Code.		consider all escalation requests on their own merits and take into account any circumstances that prevented an escalation request within our timescale of 20 working days.	
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.		A record of each complaint is available in our complaints system. This includes a chronological account of the original complaint and all contact/actions at each stage up to case closure. All written correspondence to or from the customer are attached to the complaint and available to download should they be required as evidence. Survey feedback is visible in our complaints reports.	Following our self-assessment against the Ombudsman's spotlight on Knowledge and Information Management, we are refreshing our approach to record keeping, to ensure all staff capture the key information on our systems. A first draft of our Data Strategy will be available by 30 June 2024.
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.		We encourage case handlers to provide appropriate redress at stage one of our complaints process, so that complaints can be closed efficiently and with the agreement of customers without the need for customers to escalate to escalation to stage two of the process to get their desired outcome.	We are retraining all relevant staff in 2024 and this will form part of the training.
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		The Unacceptable Behaviour Policy and Procedure has been approved by our Customer Experience Committee in April 2024.	This is published on our website.

	reasons for putting any restrictions in place and must keep restrictions under regular review.			
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.		This will be in line with the Equality Act 2010 and explained in the Unacceptable Behaviour Policy and Procedure.	The Unacceptable Behaviour Policy includes the requirement to carry out impact assessments for vulnerable customer in line with the equality Act 2010.

## 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.		We aim to deal with all complaints as quickly as possible. Where cases are more complex, we will agree an extension with the customer.	We are retraining all relevant staff in 2024 and this will form part of the training. We aim to make further improvements through our investment in the new centralised complaints resolution team.
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>		This is explained in section 6 of our policy. Our housing management system is set up to systemise this process and report performance against our targets.	

6.3	Landlords must issue a full response to stage 1 complaints <b>within 10 working days</b> of the complaint being acknowledged.		This is explained in section 6 of our policy.	We have amended the policy wording to align with the timescales set out in the Code.
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.		This is explained in section 6 of our policy. Our staff are required to agree any extension with the customer if they are unable to respond within the published timescale and explain why it is necessary.	We aim to make further improvements through our investment in the new centralised complaints resolution team.
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.		Currently this is done on a case-by-case basis verbally. Colleagues are required to record any agreed extension on the customer's record and confirm in writing. We are investigating ways to systemise this in our housing management system, so we can also confirm in writing and use this as a further opportunity to share the Ombudsman's contact details with customers.	We will further embed this through our investment in the new centralised complaints resolution team and our staff training.
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		This is explained in section 6 of our complaints policy.	Whilst we track actions on a spreadsheet to ensure they are completed. We are looking to systemise this activity for ease of monitoring and reporting.

	appropriate updates provided to the resident.			
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.		The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.	
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.		Section 6.3 of our complaints and compensation policy states:  <i>“Where a customer raises additional issues that are related to the original complaint, we will consider these as part of the stage 1 investigation and include them in the stage 1 response (when the stage 1 response has not already been issued).</i>  <i>If the stage 1 response has already been issued, or the new issues raised are unrelated to the original complaint, we will log these as a new complaint.</i>	We will further embed this through our investment in the new centralised complaints resolution team, where the additional management resource will provide effective oversight. In addition, this will be included in our staff training for 2024.
6.9	Landlords must 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 decisions made;		The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.	

	<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 stage 2 if the individual is not satisfied with the response.</p>			
--	---	--	--	--

## Stage 2

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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.		This is explained in section 6.4.2 of our complaints and compensation policy: <i>"The stage 1 response will address all points raised in the complaint and include clear reasons for any decisions. It will provide information for the complainant about how to escalate the complaint if they remain dissatisfied. In these circumstances the complainant should contact us within <b>20</b> working days of the response explaining why they remain dissatisfied. We understand that in some cases it may not be possible for a complainant to respond within this timeframe, and we will not refuse to escalate the complaint unless the escalation request relates to one</i>	

			<i>of the exclusions explained in this policy."</i>	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.		Section 6.4.3 of our complaints and compensation policy explains:  <i>"We will respond to requests for complaints to be escalated to stage two with an acknowledgement, within five working days."</i>	
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.		Section 6.4.3 of our complaints and compensation policy explains:  <i>"It is helpful to understand why a customer is still dissatisfied following our stage 1 response, and what their expectations are in order to resolve the complaint. We will make reasonable efforts to understand why a customer remains unhappy as part of our stage 2 review."</i>	We are retraining all relevant staff in 2024 and this will form part of the training.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.		All stage 2 complaints are reviewed by a senior manager or director in line with our policy.	
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.		This is explained in section 6.4.3 of our complaints and compensation policy.	

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.		This is explained in section 6.4.3 of our complaints and compensation policy. Our staff must agree any extension with the customer and explain why it is necessary.	
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.		Currently this is done on a case-by-case basis verbally. Colleagues are required to record any agreed extension on the customer's record and confirm in writing. We are investigating ways to systemise this in our housing management system, so we can also confirm in writing and use this as a further opportunity to share the Ombudsman's contact details with customers.	We will further embed this through our investment in the new centralised complaints resolution team and our staff training.
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.		Section 6.5 of our complaints and compensation policy explains>  <i>"A complaint will be closed:</i> <ul style="list-style-type: none"> <li>• <i>When the resolution is agreed with the complainant and our commitment to deliver the action has been made and accepted by the complainant and the response to the complaint is issued. The response will</i></li> </ul>	Whilst we track actions on a spreadsheet to ensure they are completed. We are looking to systemise this activity for ease of monitoring and reporting.

			<p><i>provide advice for referring the complaint to the Housing Ombudsman Service if the complainant remains dissatisfied; or</i></p> <ul style="list-style-type: none"> <li>• <i>If the complainant decides to voluntarily to withdraw their complaint."</i></li> </ul>	
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.		The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied.</li> </ul>		The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.		The stage 2 review is conducted by the relevant Head of Service or Director and will include a	

			review of the stage response with relevant members of staff.	
--	--	--	--	--

## 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>		This is part of our established policy and procedure, and we have templates to ensure that each point is considered and included in our responses.	The investment in management will provide more detailed scrutiny and oversight to ensure quality responses to customers.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		This is explained in our response letters. Any remedy offered will be explained in relation to the service failure(s) and impact on the customer.	The policy has been reviewed to reflect this.
7.3	The remedy offered must clearly set out what will happen and by when, in agreement with the resident where		This is part of our established policy and procedure, and we have templates to ensure that	We track actions on a spreadsheet to ensure they are completed, we are

	appropriate. Any remedy proposed must be followed through to completion.		each point is considered and included in our responses.	looking to strengthen our management oversight and this will be by the inclusion of this review as a standard agenda item in the newly formed service improvement forum.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		We follow HOS remedies guidance when assessing appropriate remedies.	

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

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: <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> </ul>		Our annual report to customers will include the details set out in 8.1 with the exception of 8.1b which is a new requirement. We record these decisions in a way that cannot easily be reported on, and therefore we need to make some system changes to ensure compliance with 8.1b.	A new requirement of the updated Code is set out in 8.1 b.  Update our systems to capture complaints that we have refused to accept.

	<p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.		The annual complaints performance and service improvement report is reported to the Customer Experience Committee and published on our website along with the governing body's response	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		A review would be conducted following significant change.	We will use the self-assessment to assess the performance of the new centralised complaints resolution team to ensure we remain compliant with the code and implement the changes we have set out in this document.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		We will comply with any orders or recommendations from the Ombudsman.	
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		We have a disaster recovery plan in place, which provides guidance on supporting vulnerable customers. Should any exceptional circumstances arise which affects our customers and our compliance with the Code, we	

	must provide a timescale for returning to compliance with the Code.		will keep our customers and the Housing Ombudsman Service informed.	
--	---	--	---	--

## 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.		We identify root causes and use findings to assess whether there are any systemic issues. These are included in reports to the Executive Team and Customer Experience Committee and identify learning that may lead to changes in policy, procedure or working practices.	A new service improvement forum with senior leads across the business will be operational from September 2024 and will focus on identifying trends that go beyond individual customer complaints.
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.		A positive complaint handling culture is embedded in our policy, procedure and working practices. This is included in our complaints handling training module. We use complaints data to identify trends and include these in reports to our Executive Team and Customer Experience Committee, including recommendations for changes as a result of learning from complaints.	We will further embed this through our investment in the new centralised complaints resolution team and our staff training.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report		We identify root causes and use findings to assess whether there are any systemic issues.	A new service improvement forum with senior leads across the business will be

	back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		These are included in reports to the Executive Team and Customer Experience Committee and identify learning that may lead to changes in policy, procedure or working practices.	operational from September 2024 and will focus on identifying trends that go beyond individual customer complaints.
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.		We appointed a Director of Customer Relations in April 2024.	We are recruiting a new Head of Service Improvement who will head up the complaints resolution team which will be operational by September 2024.
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').		Our Member Responsible for Complaints is Helen Jaggard who is a Board member and is the Chair of the Customer Experience Committee.	
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.		Complaints performance forms part of standard reporting to the Customer Experience Committee and Board on a quarterly basis.	To further strengthen our approach, we have appointed a Customer Champion who also sits on the Customer Experience Committee and has access to our systems and staff to provide an independent overview of our complaints management.

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>		<p>Quarterly reports are submitted to the Customer Experience Committee which includes complaints volumes, complaint categories and complaint handling performance. An update on outcomes from Ombudsman investigations is included along with cases studies, lessons learned and changes to working practices as a result of complaints.</p>	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		<p>Team and personal objectives are linked to our corporate strategy. We are including a standard objective in relation to complaint handling for all relevant staff. Compliance with this objective will be monitored at monthly 1-1 meetings and annual performance assessments. The tender documents for our contractors include a section around customer communications and complaints and the need to collaborate with us to resolve issues.</p>	<p>We are strengthening personal objectives to create a stronger link to customer service delivery and complaint handling. This will include the requirement to promote a positive complaint handling culture and to work with the Complaint Resolution Team in the investigation and resolution of complaints. This will be complete by 31 July 2024.</p>