

**Hull Churches Housing Association.**

**Annual Complaints Performance and  
Service Improvement report**

**2024**

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# 1. INTRODUCTION

- 1.1. Hull Churches Housing Association strives to provide excellent services, recognising that it can always do better. Part of this involves exercising good practice in complaint handling by being open and responsive, listening to tenants' expressions of dissatisfaction and resolving issues as quickly as possible.
- 1.2. If a formal complaint is made, this follows a two-stage process. Stage 1 is where the tenant's expression of dissatisfaction is followed by an investigation carried out by front-line staff and wherever possible amends are made. If there is still dissatisfaction after stage 1, the tenant may escalate the complaint to stage 2 for a review by a panel comprising of senior managers.
- 1.3. If the tenant remains dissatisfied at the end of stage 2, the tenant will be reminded of their right to escalate the complaint to the Housing Ombudsman for investigation. Tenants also have a right to contact the Housing Ombudsman for advice at any stage during the Association's consideration of their complaint.
- 1.4. Achieving an accessible, positive and effective complaint handling culture includes learning from complaints and making improvements to services as a result. This document presents the Association's annual complaints performance and service improvement report for 2024, in accordance with the requirements set out in the Housing Ombudsman's [Complaint Handling Code](#) (February 2024).
- 1.5. **About this report**
  - 1.5.1. The Housing Ombudsman's Complaint Handling Code became statutory from 1 April 2024, which means that social housing landlords are now obliged by law to follow its requirements.
  - 1.5.2. The Social Housing (Regulation) Act 2023 places a legal duty on the Housing Ombudsman to monitor social housing landlords' compliance with the Code. This means there is a requirement on the Association to produce an annual complaints performance and service improvement report, which must include:
    - An annual self-assessment against the Code to ensure the Association's complaint handling policy and procedures remains in line the Housing Ombudsman's requirements
    - A qualitative and quantitative analysis of the Association's complaint handling performance. This must also include a summary of the types of complaints that we have refused to accept
    - Any findings of non-compliance with the Code
    - The service improvements made resulting from learning from complaints; and
    - Any other relevant reports or publications produced by the Ombudsman in relation to the work of the Association
  - 1.5.3. This annual 'complaints performance and service improvement' report must be submitted to the Housing Ombudsman and published on the section of the Association's website relating to complaints. The governing body's response to the report must also be published alongside this. Submission of this year's self-assessment to the Ombudsman must be made by 30 June 2024.

- 1.6. Appendix 1 sets out the full Complaint Handling Code self-assessment by the Association for 2024.
- 1.7. In summary, the self-assessment found areas of strong performance in compliance with the Code and exercising best practice. For example:
- Use of the universal definition of a complaint.
  - There are only two stages to the complaints process.
  - Promotion of the complaints process and the role of the Housing Ombudsman in various communications with tenants.
  - Accessibility of the complaints process.
  - Timescales for accepting complaints, acknowledging complaints, and extensions align with the Code.
  - Scrutiny of complaints performance by the Association’s Board.
- 1.8. The self-assessment also found some areas of non-compliance with the Code and areas where, while the assessment has determined compliance, there is further opportunity for improvement. For example:
- Publishing of complaints performance and learning from complaints on the Association’s website to tenants to promote transparency.
  - Not setting out clearly the learning from complaints resolution
- 1.9. Where there is non-compliance with the Code, the Housing Ombudsman advises that there must be a detailed explanation provided in the self-assessment and the date by which compliance will be achieved. This year’s self-assessment highlights where actions will be taken to achieve full compliance through amendments to the Association’s complaints process by the end of June 2025, and these are collated into an action plan at [Annex 2](#).

## 2. ANALYSIS OF COMPLAINT HANDLING PERFORMANCE

2.1. This report considers formal complaints made by tenants in the period of 1<sup>st</sup> April 2023- 31<sup>st</sup> March 2024, relating to landlord duties, not including neighbour disputes.

### 2.2. Number of landlord duties related complaints opened

Stage 1	Stage 2	Total
6	0	6

### 2.3. Types of matters that we do not accept as a complaint

2.3.1. In practice, all complaints are accepted unless the matter being raised is not covered under the complaints' procedure. Some examples include first requests for a service, complaints about court proceedings or complaints for which there is a right of appeal.

### 2.4. Complaints by service area

Repairs and maintenance	4
Tenancy services	2
<b>Total</b>	<b>6</b>

### 2.5. Stage 1 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	<b>Total</b>
6	0	0	0	6

### 2.6. Stage 2 complaint outcomes

Upheld	Partially upheld	Not upheld	Withdrawn	<b>Total</b>
0	0	0	0	0

### 2.7. Tenant Satisfaction measures

2.7.1. The Association collects, publishes and submits to the Regulator of Social Housing a set of annual tenant satisfaction measures relevant to housing stock that falls into the definition of Low-Cost Rental Accommodation (LHRA)<sup>1</sup>. These measures show how well the Association is doing in providing quality homes and services to its tenants.

2.7.2. The following tenant satisfaction measures relate to the effective handling of complaints. The 2023-2024 results for these measures is set out below.

<b>Management information measures</b>	
CH01 (1) – Number of stage 1 complaints relative to the size of the Association	12.71
CH01 (2) – Number of stage 2 complaints received per 1,000 homes	0
CH02 (1) Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales	100.0%
CH02 (2) – Proportion of stage 2 complaints handled within the Housing Ombudsman's Complaint Handling Code timescales	NA
<b>Tenant perception survey measure</b>	
TP09 – Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling	No data available – see 2.7.4

<sup>1</sup> 1 LCRA is defined in the Housing and Regeneration Act 2008 as accommodation that is: (a) made available for rent, (b) has rent that is below the market rate, and (c) made available to people whose needs are not adequately served by the commercial housing market.

2.7.3 Performance in relation to handling complaints within Code timescales has been excellent. There have been no complaints that were not handled within timescales. The Complaints Officer has acute awareness of where it becomes likely that timescale will not be met, (for example, it is a complex complaint). The policy and process indicate that the tenant is kept informed, and where there is a good reason, an extension will be agreed between both parties with a clear timeframe on when to expect a response, and by whom, in accordance with the Code extension timescales.

2.7.4 Performance in relation to TSM TP09 cannot be accurately reported on, as our first survey of the new tenant satisfaction measures (April 2023) is due in September 2024. The latest Tenant Satisfaction Survey, carried out by Acuity in 2022, reported 73.2% of respondents were satisfied with the Association’s approach to complaints handling.

### 3. IMPROVEMENTS AS A RESULT OF LEARNING FROM COMPLAINTS

3.1. Improvements as a result of learning from complaints is an important element of a positive and effective complaint handling culture, which aims to ultimately increase tenant satisfaction with complaint handling.

3.2. Learning from complaints is much more than scrutinising data, such as the level of complaints, decisions made and whether complaints were handled within timescales. Understanding where things have gone wrong, why they have gone wrong, and how to make sure the same thing does not happen again, is central to learning and improving services.

3.3. The Association learns from its complaints and from feedback received from its tenants, however, due to the small size of the organization, the low number of complaints and the high level of collaboration between departments, responses to complaints, made in the form of an apology and putting things right, are almost instantaneous and changes to improve procedures and processes implemented immediately. This means a formal lessons learned log relating to complaints handling was, to date, not kept. The Association acknowledges this makes identification of patterns difficult. A lesson learned log, managed by a designated Complaints Officer has since been added to our complaints recording log.

3.4. Below sets out other steps the Association is taking to make improvements as a result of learning from complaints, which have also been incorporated into the action plan at Annex 2.

3.5.

Improvement needed	Steps being taken
Transparency for all tenants.	Include more performance data and learning from complaints in 'you said, we did' sections in tenant bulletins/ on website (after revision)
Increased awareness amongst tenants of the various ways to complaint.	Continue to publish informative articles in newsletters, standard letters and satisfaction surveys, including on how to make a complaint, and the role of the Housing Ombudsman.
Additional ways in which we gather feedback on our complaints handling.	Ensuring the carrying out of transactional satisfaction surveys following closure of any complaint and learning from feedback received.
Increased staff awareness and understanding of 2023 Complaints Handling Code	Make training on Complaints Handling Code and Complaints Handling Best Practice Guidance compulsory for all staff. Link to HO webinar and training is provided on the Association’s intranet and Best Practice guidance via our e-learning platform.

## 4. GOVERNING BODY'S RESPONSE TO THIS REPORT.

- 4.1. During the Board meeting of June 2024, the Board discussed, in detail, the contents of this Annual Complaints Performance and Service Improvement report, and paid particular attention to the analysis, lessons learned, and associated action plan.
- 4.2. The Board welcomes the standardised definitions included in complaints handling code 2024 and the Housing Ombudsman's increased focus on supporting tenants throughout the complaints handling process.
- 4.3. The Board particularly wants to emphasise the importance of a streamlined process for tenants complaining in relation to third parties, and the importance of the Association being the single point of access for coordination and management of such complaints in line with the 2-stage process in place, quoting 'the tenant must not be expected to go through two complaints processes.'
- 4.4. The Board also noted the outcome of the self-assessment and the high level of compliance already achieved, adding that identified quality improvement actions in relation to the one area of non-compliance, e.g., publication of the annual self-assessment and improvement report on the Association's website, had been instigated prior to this becoming a statutory requirement.
- 4.5. In conclusion, the Board commends the designated responsible person for an insightful and comprehensive report, particularly in relation to complaints handling, and all employees for their strive for continuous quality improvement of all of the Association's landlord responsibilities.

## ANNEX 1 – SELF-ASSESSMENT

### 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 tenant or group of tenants.'</i>	Yes	Direct quote in Complaints Policy and Complaints Procedure Booklet to tenants.	Hull Churches Housing uses the Complaint Handling Code definition of a complaint. This is also clearly defined for tenants on the Association's website.  This is not yet evident at this stage as the website is undergoing updates and development and will be addressed in the action plan.
1.3	A tenant does not have to use the word 'complaint' for it to be treated as such. Whenever a tenant expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Procedure Booklet for tenants  Identified in stages of the Complaints Process flowchart.	The Complaints Procedure states that any expression of dissatisfaction will lead to employees offering the choice and information on how to make a complaint.  The Complaints Policy booklet explains those who can use the complaints procedure as any person or organisation receiving or seeking to receive a service from the Association and someone acting on behalf of a person or organisation receiving or seeking a service from the Association e.g. councilor, MP, next of kin.  The 'Stages of the Complaints Handling' Flowchart advises tenants that they can ask someone to help them with their complaint at any of the stage of the complaints procedure as long as they have permission to represent the tenant.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 tenant 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 and Complaints Procedure Booklet for tenants sets out definitions.	<p>The Complaints Policy as well as the policy booklet to tenants includes advice as to what constitutes a complaint, emphasising the importance of recognising the difference between a complaint and a service request.</p> <p>A repeated request may well take the form of a complaint and tenants are offered to raise a complaint when they raise dissatisfaction with the response to their service request.</p> <p>Where a service request is received via the complaints process, this is forwarded onto the relevant team to deal with. Service requests are recorded separately to complaints on the housing landlord service case management systems.</p>
1.5	A complaint must be raised when the tenant 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 tenant complains.	Yes	Complaints Policy and Complaints Procedure Booklet for tenants.	The Complaints Procedure Booklet states that delays, non-provision of services or finance, policy issues etc. should be included as a complaint. This includes failure to provide a service at the level or standard expected of the Association. Complaints are processed even if the handling of the service request remains ongoing.
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 tenants can complain.	No	<p>Tenant Bulletin and Tenant Satisfaction Measures Survey</p> <p>Code of Practice on Tenant Satisfaction Surveys</p>	<p>This is not yet evident at this stage and will be addressed in the improvement plan.</p> <div data-bbox="1099 1077 2107 1342" style="background-color: yellow; border: 1px solid black; padding: 5px;"> <p><b>ACTION</b> An informative about the new Complaints Handling Code 2024 is to be included in tenant bulletins, standard communications and survey feedback forms to explain changes to the Complaints Handling Policy and Procedure. This informative will be included in quarterly rent statements sent to all tenants in July 2024.</p> </div>

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy	In practice, all complaints will be accepted unless the matter being raised is not covered under the Association's Complaints Procedure (see 2.2).
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 tenants. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Complaints Policy	<p>In practice, all complaints will be accepted unless the matter being raised is not covered under the Association's Complaints Procedure, including:</p> <ul style="list-style-type: none"> <li>• Requests for a service, for instance initial reporting of a faulty streetlight</li> <li>• Complaints about court proceedings</li> <li>• Complaints about personnel matters concerning employees</li> <li>• Complaints about something which affects all or most of the tenants.</li> <li>• Complaints about matters for which there is a right of appeal.</li> <li>• Complaints for which there is a legal remedy, for instance, an injury claim</li> <li>• Complaints already being dealt with by the Housing Ombudsman</li> <li>• Matters which have arisen more than 12 months before the complaint is made, unless there are very special circumstances</li> <li>• Matters connected with 'internal malpractice' and the employment protection for individuals disclosing certain information (refers to the Whistleblowing Policy)</li> <li>• Matters connected with the level of Housing Benefit awarded</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.3	Landlords must accept complaints referred to them within <b>12 months</b> of the issue occurring or the tenant 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	Complaints Policy and Complaints Procedure Booklet to tenants	As of April 2024, the Complaints Policy and Procedure states that matters that have arisen more than <b>12 months</b> before the complaint is made, unless there are very special circumstances, are covered by the Complaints Procedure.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the tenant 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	Complaints Procedure Section 3.6, pages 11-12	All stage 1 complaints are accepted unless the matter being raised is not covered under the Association's Complaints Procedure  The Complaints Procedure states that where a decision is made not to accept a stage 1 complaint, an explanation will be provided to the tenant setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		While there are some exclusions to accepting a complaint under the Complaints Procedure (as covered in 2.2), these are due to matters that do not come under the remit of the Procedure.  A blanket approach to excluding complaints is not taken. Each complaint is considered on its own merits and on a case-by-case basis.

**Section 3: Accessibility and Awareness**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for tenants 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 tenants who may need to access the complaints process.	Yes	Equality & Diversity Document Framework  Complaints Policy and Procedure Booklet for tenants	<ul style="list-style-type: none"> <li>Complaints can be made using a range of options including in person, by phone, by email/internet, on audiotape, in writing, and in languages other than English. In 2023-24, the majority of complaints were received by complaints form (50%) and by email (37.5%).</li> <li>The Association has a corporate Equality &amp; Diversity Framework, which sets out how it will comply with duties under the Equality Act 2010.</li> </ul>
3.2	<p>Tenants must be able to raise their complaints in any way and with any member of staff.</p> <p>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.</p>	Yes	<p>Complaints Handling training is compulsory for all employees.</p> <p>Complaints Procedure for staff</p>	<p>Complaints can be raised in any way and with any member of staff.</p> <p>Any complaints raised directly to staff are forwarded on to the Complaints Officer responsible for logging complaints. The complaint is then allocated to the relevant officer to investigate it.</p> <div data-bbox="1294 874 2136 1043" style="background-color: #FFD700; padding: 5px;"> <p><b>ACTION</b> Training for all staff is in place, however completion of training on updates to be implemented is not yet evident at this stage and will be addressed in the improvement plan.</p> </div>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process.</p> <p>Low complaint volumes are potentially a sign that tenants are unable to complain.</p>	Yes	<p>Comments, Compliments and Complaints log.</p> <p>6-monthly reporting to the Board</p> <p>Satisfaction Surveys</p> <p>Benchmarking and of September 2024, Tenant Satisfaction Measures 2023-2024:</p> <ul style="list-style-type: none"> <li>• CH01 (1) No. of stage 1 complaints received per 1,000 homes – 3.7</li> <li>• CH01 (2) No. of stage 2 complaints received per 1,000 homes – 0</li> </ul>	<p>Complaint volumes, types of complaints, complaint outcomes and learning from complaints, are monitored by the Association.</p> <p>The Association will also be looking to benchmark results of the Tenant Satisfaction Measures to understand how complaint volumes compare with other social housing providers of similar type and size of stock, i.e. CH01 number of stage 1 and stage 2 complaints received per 1,000 homes.</p> <p>The Association acknowledges that one of the benefits of its small size is that staff can build trusting personal relationships with all tenants. Concerns and issues are discussed as part of regular face-to-face interactions and can be responded to immediately. Whereas expressions of dissatisfaction are always logged, and tenants are reminded of the Association’s complaints procedure, issues are often resolved at first contact.</p>
3.4	<p>Landlords must make their complaint policy available in a clear and accessible format for all tenants. 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>	No	<p>Complaints Procedure Booklet for tenants and form.</p> <p>Quarterly tenant bulletins</p> <p>Annual report to tenants</p> <p>Included paragraph about complaints handling on all official correspondence</p>	<p>The complaints procedure booklet is made available in a clear and accessible format for all tenants and included in sign up pack. This includes the following information:</p> <ul style="list-style-type: none"> <li>• Formal complaints procedure and form</li> <li>• The stages of the complaints procedure and response timeframes</li> <li>• Help and advice on the complaints’ procedure.</li> </ul> <div style="background-color: #FFD700; padding: 5px;"> <p><b>ACTION</b> The Association’s website is due an overhaul, and the new site will include a dedicated webpage for complaints handling. This is not yet evident at this stage and will be addressed in the improvement plan.</p> </div>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints Policy and Complaints Procedure booklet and form for tenants.	<p>The Association publicises information about the Housing Ombudsman services and the Code in various ways throughout the year, such as in quarterly tenant bulletins, in the annual report to tenants and as a clause included in all official communication i.e., rent statements.</p> <p>The Complaints Policy and complaints procedure booklet and form for tenants include how information about complaints will be publicised. This information is available in the tenants' sign-up packs, at communal areas and display boards, and available to all staff who receive complaints. This information will also be available on the new website (see 3.4).</p>
3.6	Landlords must give tenants 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	Complaints Policy and Complaints Procedure booklet and form for tenants.	<p>The Complaints procedure booklet and form for tenants advises tenants that they can ask someone, including any member of staff or the Housing Ombudsman Services, to help with their complaint at any of the stage of the complaints.</p> <p>It also recognises that some complainants have special needs and it is important to be aware of this, which can include the complainant wishing to enlist the help of a friend, relative, councilor, MP, professional person, or an advocacy service, as long as tenants have given their consent.</p>
3.7	Landlords must provide tenants with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>Complaints Policy and Complaints Procedure booklet and form for tenants.</p> <p>Formal response letter templates.</p> <p>Information and details are included in satisfaction surveys.</p>	<p>Complaints Policy and Complaints Procedure booklet and form for tenants include information on how customers can access the relevant Housing Ombudsman Service to help with their complaint at any stage.</p> <p>The quarterly newsletter also contains a regular article on how to make a complaint and information about the right and how to access Housing Ombudsman Service.</p> <p>The stage 1 and stage 2 formal response letters templates include information on how to escalate the matter to the relevant Housing Ombudsman Service.</p>

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	<p>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).</p> <p>This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.</p>	Yes	Complaints Procedure flow chart for staff.	<p>The Administrative Associate is the Association's Corporate Complaints Officer and has overall responsibility for the administration, coordination and maintenance of the Complaints Procedure and Comments, Compliments and Complaints log.</p> <p>The Corporate Complaints Officer remains independent of any decisions but may give guidance and advice on procedure; and is the liaison with the relevant Ombudsman.</p> <p>The Head of Business Improvement is responsible for its 6-monthly audit and reporting to the Board, including the annual complaints handling and self-assessment and improvement report.</p> <p>Complaints are allocated as follows:</p> <ul style="list-style-type: none"> <li>• Stage 1 complaints – the complaint is allocated to the relevant member of staff (Tenancy Sustainment Officer or Assistant Housing Related Support Manager) to investigate the complaint and copied to the relevant Service Manager.</li> <li>• Stage 2 complaints – the Corporate Complaints Officer allocates the complaint to the relevant Service Manager who will identify/nominate a panel of Senior Managers independent of the stage one decision to investigate the complaint.</li> </ul>
4.2	<p>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</p>	Yes	Organisational structure	<p>The Corporate Complaints Officer and officers assigned to handling complaints have access to staff at all levels and autonomy to resolve complaints. The Corporate Complaints Officer is also available to all complaint handling officers to provide guidance and advice on procedure and best practice.</p>

	disputes promptly and fairly.			
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<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	All staff training presentations on the new complaints handling code planned for June -August 2024.	<p>Guidance notes and training on best practice in complaints handling will be offered to all staff involved in dealing with complaints. Complaints handling will be included as a compulsory core module in the Association's compulsory and statutory training programme.</p> <p>Refresher courses will be run by the Corporate Complaints Officer and Head of Business Improvement.</p> <p>The ethos of the complaints system is to improve the Association's performance and perceptions of its performance; to learn from mistakes; and to build trust by being open and honest in handling complaints.</p> <p>Best practice guidance, and additional training modules on complaint handling are available via the Individual development and training section of Association's intranet system SharePoint, as well as the Association's e-learning platform.</p> <p>An informative about the new Complaints Handling Code 2024 is included in the employees' Summer 2024 newsletter (June publication).</p>
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Tenants must not be treated differently if they complain.	Yes	Complaints Policy and Complaints procedure booklet and form for tenants.	There is a single procedure for dealing with complaints covered by the Code.



## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.2	The early and local resolution of issues between landlords and tenants 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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	<p>As of April 2024, the Complaints Policy and Procedure had terminology such as 'stage 0' and 'Informal stage' removed. Any expression of dissatisfaction is logged in the comments, compliments and complaints log.</p> <p>The Association acknowledges the reluctance from tenants to complain, and its reasons to do so, i.e., lack of confidence or not wanting to be seen as a 'troublemaker'. To ensure the carefully build trusting relationship between tenants and employees remains unscathed, the importance of initially entering a less formal discussion remains in place (refers to 'getting it right first time'). This lets tenants raise concerns and issues more easily and allows for early and local resolution at first contact. The tenant is, during such informal discussions and at any other stage, reminded of the Complaints Policy and Complaints Procedure Booklet and Form for Tenants, as well as their right to contact the Housing Ombudsman Services for advice.</p>
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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	The Complaints Procedure is a two-stage process for complaints handled by the Association. Stage 2 is the Association's final response under the procedure, however it does not prevent access to an external party, such as MP or Housing Ombudsman past this stage

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.4	<p>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.</p> <p>Tenants must not be expected to go through two complaints processes.</p>	NA	NA as per Procurement Policy and Approved Contractor procedure	<p>Complaints against contractors will be treated as complaints against the service area employing the contractors. Such complaints will be dealt with in accordance with the Complaints Policy and Procedure and referred by the Complaints Officer to the relevant Service. The Complaints Handler will liaise with the contractor and agree how the matter will be handled, by whom, within what timescales etc. and will notify the complainant accordingly. Such complaints are part of the two stage complaints process.</p> <p>Complaints made directly against contractors are made by the Association and this complaints process is covered in the Association's Procurement Policy and Approved Contractor Procedure which states that the repairs and maintenance service will be responsible for handling complaints from tenants and ensuring that specific contract clauses relating to complaints handling are incorporated in contracts.</p> <p>In appropriate cases, the relevant complaints handler may require the contractor to take certain interim measures to protect the interests of persons using its services.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	Complaints against third parties usually relate to Local Authority Commissioned Services, such as Housing Related Support or Adult Social Care. Tenants are supported to address their complaints to any relevant third party accordingly.
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 tenant is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the tenant must be asked for clarification.	Yes	<p>Complaints Policy and Complaints Procedure Booklet and Form for Tenants.</p> <p>Acknowledgement and formal response letter templates</p>	<p>The requirement for setting out the complaint definition is included in the procedure and in acknowledgement and response letter templates.</p> <p>If the basis of the complaint is not evident or clear enough, the complaints officer and/or complaints handler will contact the complainant to clarify the focus of their complaint and expectations on how the complaint should be taken forward. Options may include answering a question; providing further information; clarifying a misunderstanding; acknowledging and/or rectifying an error.</p>

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	<p>The Policy and Procedure clearly sets out the expectation that the Association explains to the tenant which aspects of a complaint it is, or is not, responsible for, as well as provides information on how tenants can pursue the matter further through other procedures or elsewhere.</p> <p>The Complaints Procedure provides clarification on areas not within the Association's remit.</p> <div data-bbox="1294 783 2119 1086" style="background-color: yellow; border: 1px solid black; padding: 5px;"> <p><b>ACTION</b> As part of the Association's planned website overhaul a dedicated 'complaints' webpage, will include a section to further clarify examples of most raised complaints not within the remit of the Policy and Procedure, i.e., complaints about local authorities, public footpaths and highways, homelessness decisions, Housing Benefit decisions, neighbour disputes, Parking Penalty Charge Notices or licensing decisions.</p> </div>

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind</li> <li>b. give the tenant 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> </ol>	Yes	Best practice guidance and complaints handling proforma	<p>All tenants can expect from complaint handlers the following:</p> <ul style="list-style-type: none"> <li>• To objectively consider, based on the information and evidence provided, whether the facts of the case have been determined</li> <li>• Opportunity to provide their view and have their voice listened to.</li> <li>• That no complaint is investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter.</li> <li>• Acknowledging the limited number of employees and the high level of collaboration between departments in a holistic manner, our approach to resolving complaints will be appropriate to the size of the Association. The complainant's personal details, and where requested their anonymity, will be guarded as far as practicable.</li> <li>• Individuals will distance themselves from any investigation of - or involvement in - any complaint in which they are directly or indirectly implicated.</li> </ul>
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<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the tenant suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	The Complaints Procedure states that if it is not possible to provide the complainant with a full response within target timescales, the complainant must be kept informed and told when to expect a reply.

5.10	<p>Landlords must make reasonable adjustments for tenants where appropriate under the Equality Act 2010.</p> <p>Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a tenant has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<p>Complaints Policy and Complaints Procedure Booklet and Form for Tenants.</p> <p>Vexatious Complaints Policy</p>	<p>The Complaints Procedure notes the requirement on the Association to make reasonable adjustments. Complaints can be made using a range of options including in person, by phone by email/internet, on audiotape, in writing, and in languages other than English.</p> <p>The Association is committed to providing services that are accessible to the broadest range of customers. This commitment also encompasses legal obligations under the Equality Act 2010. If a customer is having difficulty accessing services for any reason, the Association will adjust the way it provides its services where it is reasonable to do so.</p> <p>Where a customer is behaving in a difficult, persistent or unacceptable manner, the Association considers whether this may be caused by any personal difficulties or characteristics they have, which may be making services more difficult to access or use (Vexatious complaints policy refers).</p>
5.11	<p>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.</p>	Yes	<p>Complaints Policy and Complaints Procedure Booklet and Form for Tenants.</p> <p>Vexatious Complaints Policy</p>	<p>In practice, all complaints will be accepted unless the matter being raised is not covered under the Association's Complaints Procedure (as covered in 2.2) or there is a valid reason not to accept the complaint.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 tenant, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Pyramid Housing Management System – individual tenant files.  Comments, Compliments and Complaints log	<p>All formal complaints and correspondence are logged on the Association’s Comments, Compliments and Complaints log and entries made in tenants’ individual files on our Housing Management System Pyramid. This ensures that complaints records are fully maintained and preserved.</p> <div data-bbox="1285 392 2107 663" style="background-color: #FFD700; padding: 5px;"> <p><b>ACTION</b> The Association is in the process of procuring a new Pyramid module for logging complaints (ASB complaints only at this stage) with the aim to provide improved functionality so that efficiency is increased along with the ability to interrogate data more effectively and easily. The new system is due to be operational in the second half of 2024.</p> </div>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process.  Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Effective and timely responses to first Stage complaints limit the number of escalations.	<p>It is the Association’s aim to ensure that the remedy provided is appropriate and proportionate to redress the matter sufficiently without the need for escalation.</p> <p>Out of 6 stage 1 complaints in 2023-24, there were 0 complaints escalated by tenants to stage 2.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from tenants 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	Vexatious Complaints Policy	The Association has a Policy on Unreasonably Persistent and/or Vexatious Complainant’s Behaviour. This policy includes guidance on how to consider putting and keeping restriction in place.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Vexatious Complaints Policy  Employee Code of Conduct	<p>The Association's Vexatious Complaint's Policy sets out that the Association is mindful that it has responsibilities under equality and diversity legislation concerning the way it provides and reasonably adjusts its services. Where a customer is behaving in a difficult, persistent or unacceptable manner, the Association must consider whether this may be caused by any personal difficulties or characteristics they have, which may be making services more difficult to access or use.</p> <p>However, we must also show fairness to all customers by prioritising our resources effectively. Time spent with each customer should be appropriate and proportionate.</p> <p>Of equal importance, is the Employee Code of Conduct which requires staff to maintain high standards when dealing with customers and make reasonable adjustments. However, this does not extend to dealing with unacceptable behaviour. (third party harassment guidelines refer).</p>

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	<p>Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation.</p> <p>Landlords must consider factors such as the complexity of the complaint and whether the tenant is vulnerable or at risk.</p> <p>Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the tenant.</p>	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	<p>The Complaints Procedure states that under stage 1, resolution and apology should be immediate where possible. Tenants most often want an explanation, an apology and reassurance that the same thing will not happen to others.</p> <p>If the basis of the complaint is not evident or clear enough, the Complaints Officer will contact the complainant to clarify the focus of their complaint and then decide how the complaint should be taken forward. Options may include:</p> <ul style="list-style-type: none"> <li>• answering a question;</li> <li>• providing further information;</li> <li>• clarifying a misunderstanding;</li> <li>• acknowledging and/or rectifying an error.</li> </ul>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within 5 working days of the complaint being received.</u></b>	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants.	Comments, Compliments and Complaints log includes response timeframes and triggers warning of risk of non-compliance
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days of the complaint being acknowledged.</u></b>	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants  100% of stage 1 complaints responded to in time	Comments, Compliments and Complaints log includes response timeframes and triggers warning of risk of non-compliance



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.4	<p>Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the tenant of the expected timescale for response.</p> <p>Any extension must be no more than <b>10 working days</b> without good reason, and the reason(s) must be clearly explained to the tenant.</p>	Yes	<p>Complaints Policy and Complaints Procedure Booklet and Form for Tenants</p> <p>Acknowledgement and formal response letter templates include a section on the reason for delay and clarification of expected timeframe of 10 working days</p>	Comments, Compliments and Complaints log includes response timeframes and triggers warning of risk of non-compliance
6.5	When an organisation informs a tenant about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	Informative paragraph included in response letter templates
6.6	A complaint response must be provided to the tenant 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 tenant.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure states that if the complaint is upheld or partially upheld (i.e. the facts have been established), the complaint handler will consider whether any other actions and/or remedies are appropriate at the point of issuing the decisions on the complaint. The decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress.
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	Stage 1 response letter template	The stage 1 response letter template is structured so that each individual point of a complaint is set out, followed by facts found in the investigation, conclusion and details of the reasoning for the decision on each point raised.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.8	<p>Where tenants 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 yet been issued.</p> <p>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.</p>	Yes	Internal control and auditing of Comments, Compliments and Complaints log reflects this practice.	<p>Additional complaints raised during the investigation that are related to the original complaint are incorporated into the stage 1 response.</p> <p>If after the response to stage 1 is issued, the tenant raises a further complaint regarding an issue unrelated to the first complaint, this is logged as a new complaint.</p> <p>Complaints can be cross referenced by property code to ensure patterns can be identified i.e., where:</p> <ul style="list-style-type: none"> <li>• separate complaints might over time prove to be related</li> <li>• persistent complaining might indicate underlying personal problems, such as a decline and health and wellbeing or unidentified or unknown characteristics.</li> </ul>
6.9	<p>Landlords must confirm the following in writing to the tenant at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Stage 1 response letter template	<p>The stage 1 response letter template includes the required information.</p> <div data-bbox="1312 780 2094 1157" style="border: 1px solid black; background-color: #FFD700; padding: 10px;"> <p><b>ACTION</b></p> <p>Albeit currently compliant, for transparency and ease of internal control and audit activity, as well as to improve efficiency and effectiveness of Complaints Handling processes, the structure of acknowledgement letters' and response letters' templates will be updated during June 2024, to mirror terminology used in the Complaints Handling Code 2024 requirements.</p> </div>

## 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 tenant's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure has a stage 2 process for escalating the complaint should the complaint not be resolved to the tenants' satisfaction after stage 1. Stage 2 is the Association's final response.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within <b>5 working days</b> of the escalation request being received.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure states the acknowledgement for a request for request for a stage 2 investigation will be sent within <b>5 working days</b> of receipt
6.12	Tenants 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 tenant remains unhappy as part of its stage 2 response.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure states that stage 2 is an opportunity to consider a case completely afresh through a formal investigation. The investigating Senior manager will agree with the tenant, a detailed, written statement of the complaint, and check stage 1 is completed, before composing a panel to: <ul style="list-style-type: none"> <li>• Consider the issues afresh</li> <li>• Consider the complaint against any documents submitted by the tenant and compiled during stage 1 investigation.</li> <li>• Review reasons given for stage 1 conclusions and decisions</li> <li>• Remind the complainant of their rights and invite the complainants and/or representative to a panel meeting where they can give their view, provide new evidence for consideration and have their voice heard.</li> <li>• Consult Legal Services if there are any doubts about the Association's statutory powers relevant to the issues.</li> <li>• Consider whether referral to an external organisation is required.</li> <li>• Decide upon their own findings</li> <li>• Send a formal response to the tenant setting out the panel findings</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure states that the relevant Service Manager will identify/nominate a panel of investigating officers independent of the stage 1 decision.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days of the complaint being acknowledged.</u></b>	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	No stage 2 complaints were handled during 2023 -24. The Complaints procedure identifies this as an applicable time frame.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the tenant of the expected timescale for response. Any extension must be no more than <b><u>20 working days</u></b> without good reason, and the reason(s) must be clearly explained to the tenant	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	No stage 2 complaints were handled during 2023 -24 The Complaints procedure identifies this as an applicable time frame.
6.16	When an organisation informs a tenant about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	No stage 2 complaints were handled during 2023 -24 The Complaints procedure identifies this as required practice.
6.17	A complaint response must be provided to the tenant 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 tenant.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Complaints Procedure states that if the complaint is upheld or partially upheld (i.e. the facts have been established), the complaint handler will consider whether any other actions and/or remedies are appropriate at the point of issuing the decisions on the complaint. The decision on the complaint is not postponed for the purpose of completing outstanding actions required for redress.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Stage 2 response letter template	The stage 2 response letter template is structured so that each individual point of a complaint is set out followed by what was found in the investigation, and details of the reasons for the decision on that point by setting out the facts and conclusions.
6.19	<p>Landlords must confirm the following in writing to the tenant at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Ombudsman</li> <li>• Service if the individual remains dissatisfied.</li> </ul>	Yes	Stage 2 response letter template	<p>The stage 2 response letter template includes the required information.</p> <div style="background-color: #FFD700; padding: 5px; border: 1px solid black;"> <p><b>ACTION</b>  Albeit currently compliant, for transparency and ease of internal control and audit activity, as well as to improve efficiency and effectiveness of Complaints Handling processes, the structure of acknowledgement letters' and response letters' templates will be updated during June 2024, to mirror terminology used in the Complaints Handling Code 2024 requirements.</p> </div>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	<p>Stage 2 is the Association's final response.</p> <p>The Complaints Procedure does not have a further stage for consideration by the Association.</p>

## 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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	<p>The Complaints Procedure states that remedies for complainants under the procedure will normally take the form of putting things right and an apology. The options for redress are any, or a combination, of:</p> <ul style="list-style-type: none"> <li>• an apology where appropriate</li> <li>• an explanation of the events or policy concerned</li> <li>• agreeing to change a decision or action</li> <li>• agreeing to put right a mistake or the consequences of a mistake</li> <li>• a review of a policy or project, or its implementation, to take into account the complaint</li> <li>• improving communication to staff or the public to avoid the same grounds for complaint as previously</li> <li>• improving staff training to eliminate the root cause of the complaint.</li> </ul> <p>Any remedies that will be taken in individual cases are set out in official complaints response letter.</p>
7.2	Any remedy offered must reflect the impact on the tenant as a result of any fault identified.	Yes	<p>Complaints Policy and Complaints Procedure Booklet and Form for Tenants</p> <p>Compensation Policy</p>	<p>Key questions in considering an appropriate, proportionate and reasonable remedy include:</p> <ul style="list-style-type: none"> <li>• What outcome does the complainant expect to achieve?</li> <li>• Can the person affected be put back in the position they would have been in if nothing had gone wrong?</li> <li>• On what basis can loss of non-monetary benefit be calculated?</li> <li>• Is there quantifiable financial loss, i.e., incurred costs or payments not received?</li> <li>• How severe was any other impact in terms of distress, harm or risk?</li> <li>• What is the personal injustice and did the actions or inactions of the complainant or a third party contribute to or lessen the injustice?</li> <li>• Is there a more appropriate form of payment than monetary?</li> </ul>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the tenant where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants  Compensation Policy	The formal response letter will clearly set out any remedial actions. Such actions are logged on the complaints management system.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy and Complaints Procedure Booklet and Form for Tenants  Compensation Policy	The Complaints Procedure recommends that complaint handlers refer to the compensation policy on remedies, which references in turn on the Housing Ombudsman guidance on remedies.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>• the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>• a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept</li> <li>• any findings of non-compliance with this Code by the Ombudsman</li> <li>• the service improvements made as a result of the learning from complaints</li> <li>• any annual report about the landlord's performance from the Ombudsman; and</li> <li>• any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Complaints Performance and Service Improvement Report for the Housing Landlord Service (2024)	The annual complaints performance and service improvement report for 2024 has been produced containing the required information.



8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints.</p> <p>The governing body's response to the report must be published alongside this.</p>	No		<p>The 2024 annual complaints performance and service improvement report has been reported to the Association's governing body (board) on 19<sup>th</sup> June 2024.</p> <p>It will be published on the 'Complaints page' of the website alongside the Board's response after the planned overhaul of the Association's website is complete (see also 1.2, 3.4, 3.5 and 8.5)</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Not applicable at this time.

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		To date there has not been an instruction from the Housing Ombudsman to review and update the self-assessment.
8.5	<p>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 tenants who may be affected, and publish this on their website</p> <p>Landlords must provide a timescale for returning to compliance with the Code.</p>	Yes	<p>Cyber Security Strategy</p> <p>Business Continuity Plans</p> <p>Cyber security risk assessments and Risk Register</p>	<p>The Association has various strategies, policies and plans in place for exceptional circumstances, including cyber incidents. In line with ICO guidance, the Association's Crisis Management Team is responsible for providing information to tenants who may be affected.</p> <p>Where the Association is unable to comply with the Code due to exceptional circumstances, this will be communicated to tenants and the Housing Ombudsman.</p>

## 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	Data and Performance analysis  Tenant Satisfaction Measures survey return  Cross referencing of Comments, Compliments and Complaints	Key feedback from Complaints Handling Satisfaction surveys will help to improve our complaints handling procedure.  Based on the feedback and insight received from the Tenant Satisfaction Survey returns and learning from complaints, an improvement plan is developed to improve performance and satisfaction.  <b>ACTION</b> Tenant Satisfaction Measures survey returns, expected September 2024 will also be used to identify key areas for service improvement
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	Data and Performance analysis  Tenant Satisfaction Measures survey return  Cross referencing of Comments, Compliments and Complaints logs	The Association uses complaints monitoring as a source of intelligence.  Examples of 'lessons learned' are included in tenant bulletins and employee newsletters.
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 tenants' panels, staff and relevant committees.	Yes	Board Report and meeting minutes  Tenant Bulletins  Annual Report to tenants	The Association's Board receives 6-monthly reports on complaints activity across the Association, including landlord related complaints.  Complaints, performance and learning from complaints has been reported in quarterly tenant bulletins and the Annual Report to tenants.  <b>ACTION</b> To promote a positive complaint handling culture complaints activity and learning from complaints will be a recurring feature in quarterly employee newsletters from June 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 and Complaints Procedure Booklet and Form for Tenants	<p>The Administrative Associate is the Association's Corporate Complaints Officer and has overall responsibility for the Complaints Procedure and its administration and maintenance. The Corporate Complaints Officer remains independent of any decisions but may give guidance and advice on procedure.</p> <p>The Head of Business Improvement is responsible for compliance with the Housing Ombudsman Complaints handling code, and internal control of the effective operation of Complaints Policies, Procedures and Processes.</p> <p>Senior Managers are responsible for discussing with their teams, patterns of complaints and possible service improvements etc. with a view to remedying any acknowledged deficiencies as quickly as possible.</p>
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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The Association's Member Responsible for Complaints (MRC) is the Chief Executive of the Association.
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	Complaints Policy and Complaints Procedure Booklet and Form for Tenants	The MRC will be supported by the Head of Business Improvement in their role to ensure the governing body (Board) receive regular information and insight on complaints, and access to suitable information and staff.



## ANNEX 2 – SELF-ASSESSMENT ACTION PLAN

Code provision	Code requirement	Action	Target date	Responsible officer
<b>Exclusions</b>				
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 tenants can complain.	An informative about the new Complaints Handling Code 2024 is to be included in tenant bulletins, standard communications and survey feedback forms to explain changes to the Complaints Handling Policy and Procedure. This informative will be included in quarterly rent statements sent to all tenants.	July 2024	Head of Business Improvement
<b>Accessibility and Awareness</b>				
3.2	Tenants 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.	Training for all staff is in place, however completion of training on updates to be implemented is not yet evident at this stage and will be addressed in the improvement plan.	August 2024	Complaints Coordinator and Head of Business Improvement
3.4	Landlords must make their complaint policy available in a clear and accessible format for all tenants. 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.	The Association's website is due an overhaul, and the new site will include a dedicated webpage for complaints handling. This is not yet evident at this stage and will be addressed in the improvement plan.	August 2024	Accounts and System Manager and Head of Business Improvement
<b>The Complaint Handling Process</b>				
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.	As part of the Association's planned website overhaul a dedicated 'complaints' webpage, will include a section to further clarify examples of most raised complaints not within the remit of the Policy and Procedure.	August 2024	Accounts and System Manager Head of Business Improvement
Code provision	Code requirement	Action	Target date	Responsible officer

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 tenant, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	The Association is in the process of procuring a new Pyramid module for logging complaints (ASB complaints only at this stage) with the aim to provide improved functionality so that efficiency is increased along with the ability to interrogate data more effectively and easily.	The new system is due to be operational in the second half of 2024.	Accounts and Systems Manager
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**Complaint stages – stage 1**

6.9	Landlords must confirm the following in writing to the tenant at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Albeit currently compliant, for transparency and ease of internal control and audit activity, as well as to improve efficiency and effectiveness of Complaints Handling processes, the structure of acknowledgement letters' and response letters' templates will be updated to mirror terminology used in the Complaints Handling Code 2024 requirements.	June 2024	Complaints Officer
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**Complaint stages – stage 2**

6.19	Landlords must confirm the following in writing to the tenant at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Albeit currently compliant, for transparency and ease of internal control and audit activity, as well as to improve efficiency and effectiveness of Complaints Handling processes, the structure of acknowledgement letters' and response letters' templates will be updated to mirror terminology used in the Complaints Handling Code 2024 requirements.	June 2024	Complaints Officer
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Code provision	Code requirement	Action	Target date	Responsible officer
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**Scrutiny & oversight: continuous learning and improvement**

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.	Tenant Satisfaction Measures survey returns, will also be used to identify key areas for service improvement	Expected September 2024	Data and Performance Analyst, Service managers, Head of Business Improvement
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 tenants' panels, staff and relevant committees.	To promote a positive complaint handling culture complaints activity and learning from complaints will be a recurring feature in quarterly employee newsletters	from June 2024.	Head of Business Improvement