

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<p>The tenant Perception Survey shows that we do not always give residents a choice to make a complaint when they are unhappy.</p> <p>All complaints submitted by a third party are handled in line with a complaints policy; however, only where the resident has provided authority for the third party to do so and given permission to share information with them.</p>	Further internal training is required to ensure that all staff handle dissatisfaction in this way and that the response is documented.	Complaints Manager	Complete

1.4	<p>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>	Yes	<p>We recognise this and use the Housing Ombudsman's flowcharts; however, they are not in our procedure.</p>	<p>Add Service Request flowcharts to the Complaints procedure.</p>	<p>Complaints Manager/Assistant Housing Director</p>	Complete
1.5	<p>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</p>	Yes	<p>We have seen evidence through the Tenant Perception Survey that this is not consistent from us.</p>	<p>We need to strengthen the policy & procedures.</p>	<p>Complaints Manager/Assistant Housing Director/Assistant Maintenance Director</p>	Complete

	address the service request if the resident complains.			Carry out staff training.	Complaints Manager	Complete
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	We do not currently do this; we will follow up with some residents who are dissatisfied but have not routinely made them aware of the complaints process.	We need to review our process for responding to transactional surveys; this could help improve communication with residents. Process needs to link to Complaints Policy and staff training is required.	Complaints Manager/Assistant Maintenance Director	Complete

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	We currently do this but cannot guarantee consistency with the explanation to the resident.	A standard template letter is needed.	Complaints Manager	Complete

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	We accept complaints through all our communication channels. Reasonable adjustments are detailed within the Complaints Policy and Procedure.	The reasonable Adjustment Policy is due to be completed by 31 May 2024.	Assistant Housing Director	Complete

3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	All staff were trained when the code came into effect in July 2020. All new starters are provided with training.	<p>Refresher training is needed for mobile staff.</p> <p>We will hold a session at the next all operatives meeting to cover this.</p>	Complaints Manager/Assistant Maintenance Director	Complete
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We welcome complaints and the opportunity to learn from them. We have not seen low complaint volumes since July 2020.	<p>Further benchmarking with Independent East would identify if we were an outlier in terms of complaint numbers.</p> <p>Will have further discussions at the next Independent East Complaints group meeting.</p>	Complaints Manager/Assistant Housing Director.	Complete

3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	We have a Policy & Procedure which is clear and accessible and contains the required information. It is available on the website.	Policy & Procedure require review. An easy-to-read summary document is needed to accompany the Policy and Procedure. This is something we have discussed working with TAP on.	Complaints Manager/Assistant Housing Director.	Complete
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	This is within the current complaints policy.	Review when we review the policy and procedure.	Complaints Manager/Assistant Housing Director	Complete

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
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 disputes promptly and fairly.</p>	Yes	<p>The Complaints Manager has access to all staff needed and will escalate any challenges to their line manager, however the culture means that this is not very often.</p>	<p>We will emphasise the need for co-operation during staff training.</p>	<p>Assistant Maintenance Director</p>	Complete
4.3	<p>Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the</p>	Yes	<p>The set up of having complaints handled by Senior Managers was not sustainable without a significant decrease in</p>	<p>Review this area after the complaints handler has been in post for 6 months as we should then be compliant if complaint levels do not increase.</p>	<p>Complaints Manager/Assistant Maintenance Director</p>	Complete

	importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively		complaints which we have not seen. The recruitment of a complaints handler will assist us in being compliant in this area			
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	One policy in place. We have no evidence of residents being treated differently after making a complaint.	Monitor for any indicators of this through spot checks or resident feedback.	Complaints Manager/AD Housing and Maintenance/MRC	Complete

5.6	<p>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.</p>	Yes	<p>We do not do this consistently when a complaint is logged.</p>	<p>We need a standardised process or way of logging complaints to ensure we are capturing this at the logging stage and the tenant is not having to repeat themselves.</p>	Complaints Manager	Complete
5.7	<p>When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for</p>	Yes	<p>We do not currently include this in the acknowledgement letter.</p>	<p>Amend existing acknowledgement template letter.</p>	Complaint Manager	Complete

	and clarify any areas where this is not clear.					
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind. b. give the resident a fair chance to set out their position. c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	We do not have any evidence that we are not complaint.	We need to introduce spot checks of stage 1 and 2 responses to consider any inconsistency or concerns in this area.	Complaints Manager/AD Maintenance	Complete

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	This has not been consistent over the last 18 months but is a priority for the complaints handling team.	To be reviewed upon the complaints handler post being in place for 2 months.	Complaints Manager/Assistant Maintenance Director	Complete
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	Yes	Reasonable adjustments to enable residents to make a complaint is an important principle in our policy. We record any disability/protected characteristic and vulnerability within the customer record and staff are alerted to this upon opening the record.	Reasonable Adjustment Policy due to be completed by 31 May 2024.	Assistant Housing Director	Complete

	be kept under active review.					
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	All correspondence is retained from the complaint investigation and uploaded to the customer record where possible.	Review if there are types of correspondence that we have not been able to upload.	Complaints Manager	Complete
5.14	Landlords must have policies and procedures in place for managing unacceptable					

	behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	We have an Unreasonable Complaint Policy and Procedure; however this is rarely used.	A review of the policy is required at the next review date as there are steps that need to be more defined.	Complaints Manager/AD Housing and Maintenance	Complete
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
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	Yes	Complaints are currently dealt with in date order. We do not prioritise responding to complaints which are less complex, instead we would consider the best person to	Review this once the new Complaints Handler is in post and we can make a better judgement on our compliance.	Complaints Manager/Assistant Maintenance Director	Complete

	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.		respond to the complaint.			
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	We are not consistently meeting this at present, due to limited resources and the volume of complaints.	Aim is to be compliant once the Complaint Handler post is in place.	Complaints Manager	Complete
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of	Yes	We are not consistently meeting this at present.	Aim is to be compliant once the Complaint Handler post is in place.	Complaints Manager	Complete

	the complaint being acknowledged.					
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	We do this but we need a standard template to record and communicate this decision with the resident.	Standard template letter needed and to be attached to complaints process.	Complaints Manager	Complete
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact	Yes	We are not consistently meeting this at present.	Add this to the standard template confirming extension.	Complaints Manager	Complete

	details of the Ombudsman.					
6.6	<p>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.</p>	Yes	<p>Our standard response letter details the outstanding actions and this is detailed in our policy.</p>	<p>We need to improve the reporting and monitoring of actions.</p> <p>Further communication needed to promote this with residents to ensure this expectation is clear and not a reason for dissatisfaction.</p> <p>Update: The letters and bbs and communications with residents include agreeing outstanding actions, documenting them and raising them for monitoring.</p>	<p>Complaints Manager/Assistant Maintenance Director</p>	Complete
6.7	<p>Landlords must address all points raised in the</p>					

	complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.	Yes	This is part of the training for complaint handlers. We can evidence consistency in this area.	We need to introduce spot checks of stage 1 and 2 responses to consider any inconsistency or concerns in this area.	Complaints Manager/AD Housing and Maintenance/MRC	Complete
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This is part of the training for complaint handlers. We can evidence consistency in this area.	We need to introduce spot checks of stage 1 and 2 responses to consider any inconsistency or concerns in this area.	Complaints Manager/AD Housing and Maintenance/MRC	Complete

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Due to our stage 2 being a meeting with Leadership and Board we do not meet these timescales as it takes more time to arrange them and liaise over availability.	Action for Leadership and Board to consider how we can comply with this timescale for example having pre booked slots available each month.	Leadership Group/Board	Complete
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	Yes	As we are already over the 20 working days when the stage is held any extension to the current response time of 3 working days is automatically outside of these timescales.	If we can resolve the meeting being outside of the 20 working days then this may be resolved.	Leadership Group/Board	Complete

	without good reason, and the reason(s) must be clearly explained to the resident.					
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	We do not currently do this but we can have this in place from 1 April 2024 when the code takes effect.	Draft a standard template confirming extension.	Complaints Manager	Complete
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	Yes	Our standard response letter details the outstanding actions and this is detailed in our policy.	We need to improve the reporting and monitoring of actions. As per 6.6, 6.7 and 6.8	Complaints Manager/Assistant Maintenance Director	Complete

	and actioned promptly with appropriate updates provided to the resident.					
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
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"> • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance, or reasons. 	Yes	<p>We can evidence compliance with this through our complaint responses.</p> <p>Complaint Handlers can identify changes to policies and procedures as a learning but these do require Leadership Group approval.</p>	Reemphasise this at the next complaint handlers training session.	Complaints Manager	Complete

	<ul style="list-style-type: none">• Taking action if there has been delay.• Reconsidering or changing a decision.• Amending a record or adding a correction or addendum.• Providing a financial remedy.<ul style="list-style-type: none">• Changing policies, procedures, or practices.					
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
8.1	Any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	We do not currently publish or have any scrutiny of the Spotlight Reports from residents.	<p>The Spotlight Reports are currently being reviewed and cross referenced with the risk register to prioritise the actions. They will go to a future Board meeting for noting.</p> <p>Agree on a process for how we complete and publish Spotlight Reports to residents.</p> <p>Update: all spotlight reports have now gone to board.</p>	<p>Leadership Group and Board</p> <p>Wider Leadership Group</p>	<p>Complete</p> <p>Complete</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 on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The reports on complaint performance are not currently published on the website.	Ensure future reports are anonymised and circulated to TAP and uploaded to website.	AD Housing and Maintenance	Completed
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Action required	Action Owner	Completion Date
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	We will always identify and acknowledge failures and learnings in complaints if we have identified them but they were not part of the original complaint. Our complaint responses can evidence this although it is not something that happens frequently.	Reemphasise this at the next complaint handlers training session.	Complaints Manager	Complete
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use	Yes	Staff recognise the value of complaints and this is reflected in our culture and is evident in the increase in	Embed the learning from complaints further and use the opportunities we have to promote	Complaint Manager/Assistant Directors	Complete

	complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		complaints we have received since the introduction of the code in 2020. We have been recording learnings from complaints since 2021 and there is work to do to improve this but we have a basic structure in place to demonstrate this which is published to residents.	this more with staff.		
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff, and relevant committees.	Yes	We have been recording learnings from complaints since 2021 and there is work to do to improve this but we have a basic structure in place to demonstrate this which is published to residents. We	<p>Arrange a session on learning from complaints with the Housing for Over 55's panel.</p> <p>Consider as part of the Resident Involvement Strategy review, how we can get more scrutiny on complaints.</p>	<p>Complaints Manager/Assistant Maintenance Director</p> <p>Comms & Resident Engagement Manager/Assistant Housing Director</p>	<p>Complete</p> <p>Complete</p>

			have done a session with the Tenants Assurance Panel			
9.4	<p>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.</p>	Yes	<p>We have a Complaints Manager who is the lead for complaints. This role has only been in place since November and the priority has been responding to stage 1 complaints. Once the new complaint handler is recruited, it will enable the Complaints Manager to undertake the additional tasks supported by the Assistant Maintenance Director.</p>	<p>Develop an action plan for the development of the Complaints Manager role.</p>	<p>Complaints Manager/Assistant Maintenance Director/Executive Director of Operations</p>	Complete

9.6	<p>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.</p>	Yes	<p>The MRC has regular meetings with relevant staff and is able to access the performance information and update the Board.</p>	<p>A separate meeting has taken place and an action plan which highlights some areas we can strengthen this area.</p>	<p>Complaints Manager/AD Housing and Maintenance/MRC</p>	Complete
9.7	<p>As a minimum, the MRC, and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance.</p>	Yes	<p>There is some further work to do in this area to be compliant.</p>	<p>Actions have been identified from the Expectations of the MRC document and meeting. These actions will be incorporated into the overall action plan to achieve compliance.</p>	<p>Complaints Manager/AD Housing and Maintenance/MRC</p>	Complete

	<p>b. regular reviews of issues and trends arising from complaint handling.</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working</p>	Yes	<p>We will ensure that all stage 1 complaint handlers have an objective in this years appraisal.</p>	<p>Communicate with the relevant line managers about setting the objective.</p>	<p>Assistant Housing Director</p>	Complete

	<p>with colleagues across teams and departments.</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>				
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