

Section #1 – Definition of a complaint

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes. Included within policy statement.		
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes. Included within policy statement; strengthened to clarify position with regards to MP and Cllr correspondence on behalf of complainants.		
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes. Included within policy statement.		
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes. Policy sets out the circumstances under which a complaint would not be accepted. No complaints refused to date.		
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes. As above.		
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the	Yes. Included within policy statement.		

	reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.			
Best practice 'should' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes. Policy strengthened to include definition of service request.		
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.		No	Surveying guidelines to be drafted to confirm the process for managing dissatisfaction. [Target 31/07/22 – Customer Voice Lead]

Section #2 – Accessibility and awareness

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes. The policy details that complaints can be received in person at any office, over the phone, via dedicated email, in writing, via our tenants web portal or via social media		

2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes. Policy and associated leaflet detail the process; leaflet was developed in conjunction with our Tenant Panel for clarity		
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes. Dedicated complaints section on the website.		
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes. Included within policy statement.		
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes – in part Complaints Policy and Process detailed on website and in associated leaflet. Information regarding Housing Ombudsman Scheme also included in process leaflet. Complaints Handling Code self assessment published on website. Details of the Housing Ombudsman Scheme included within quarterly tenant magazine, and displayed on posters throughout offices.		Complaints Process to be included in Comms plan for monthly promotion via social media and website [Target 01/08/2022 – Communications Business Partner] Website content to be strengthened to include information regarding the Code and the role of the Ombudsman. [Target 01/08/2022 – Communications Business Partner]

				<p>Standing content item re. Housing Ombudsman Scheme to be confirmed for all future tenant magazines</p> <p>[Target 01/08/2022 – Communications Business Partner]</p> <p>Housing Ombudsman awareness posters to be added to all sheltered schemes and community centre locations.</p> <p>[Target 01/08/2022 – Head of Housing & Community Services]</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	<p>Yes.</p> <p>Contact information for Ombudsman included within quarterly tenant magazine.</p>		<p>Information regarding Housing Ombudsman Scheme to be included with future annual rent letters.</p> <p>[Target 01/04/2023 – Head of Housing & Community Services]</p>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	<p>Yes.</p> <p>Included within complaints leaflet.</p>		

Best practice 'should' requirements

Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive	<p>Yes.</p> <p>Complaints policy details this.</p>		

	complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.			
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Section #3 – Complaint handling personnel

Mandatory ‘must’ requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes. Dedicated Customer Complaints Team established		
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes. Complaints Team act as independent investigators.		
Best practice ‘should’ requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
3.3	Complaint handles should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to 	Yes. Complaints Team receive corporate customer service training. Procedures set out how complaints are investigated and the cooperation required from business service leads to resolve.		In addition, role profile to be revised to include these requirements explicitly. [Target 30/09/2022 – Director of Customer and Communities]

	act to resolve disputes quickly and fairly.		
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Section #4 – Complaint handling principles

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes. Policy and procedures reflect this requirement.		
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes. Requirements set out in procedures.		Template letter to guide content to be finalised. [Target 31/08/2022 – Customer Complaints Manager]
4.6	A complaint investigation must be conducted in an impartial manner.	Yes. Requirements set out in procedures.		
4.7	The complaint handler must: <ul style="list-style-type: none"> deal with complaints on their merits act independently and have 	Yes. Requirements set out in procedures.		

	<p>an open mind</p> <ul style="list-style-type: none"> • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 			
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes. Requirements set out in procedures.		
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes. Requirements set out in procedures.		
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes. Included within policy.		
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes. Included within policy.		
4.15	A full record must be kept of the complaint, any review 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	Yes. Detailed within procedure.		

	reports or surveys prepared.			
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes. Included within policy handbook.		

Best practice 'should' requirements

Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes. Detailed within procedure.		
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes. Detailed within procedure.		
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes. Included with policy and procedure.		Template acknowledgement letter to be amended to include. [Target 31/08/2022 – Customer Complaints Manager]
4.8	Where a key issue of a complaint relates to the parties legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes. Detailed within procedure.		
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes. Detailed within procedure.		

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes. Detailed within procedure.		
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.		Not currently – new process to be established.	New process for obtaining feedback to be established via use of digital engagement platform. [Target 31/12/2022 – Customer Voice Lead]
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes. Covered with Customer Service training for all colleagues.		
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes. Detailed in relevant policy		

Section #5 – Complaint stages

Stage #1

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good	Yes. Included in the policy.		

	reason.			
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes. Detailed within procedure.		
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes. Detailed within procedure.		Template letter to guide content to be finalised. [Target 31/08/2022 – Customer Complaints Manager]
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right <ul style="list-style-type: none"> • details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer.	Yes. Detailed within procedure.		Template letter to guide content to be finalised. [Target 31/08/2022 – Customer Complaints Manager]

Stage #2

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the	Yes. Included within policy.		

	landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.			
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes. Detailed within procedure.		Template letter to guide content to be finalised. [Target 31/08/2022 – Customer Complaints Manager]
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes. Detailed within procedure.		
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes. Included within policy.		
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes. Included within policy.		
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right 	Yes. Detailed within procedure.		Template letter to guide content to be finalised. [Target 31/08/2022 – Customer Complaints Manager]

	<ul style="list-style-type: none"> • details of any outstanding actions and • if the landlord has a third stage, details of how to escalate the matter to stage three <ul style="list-style-type: none"> • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 			
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Stage #3

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes. Two stages set out in the policy.		
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	n/a		

Stage #1

Best practice 'should' requirements

Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes. Included within policy.		
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes. Detailed within procedure.		
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes. Detailed within procedure.		
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes. Detailed within procedure.		

Stage #2

Best practice 'should' requirements

Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes. Detailed within procedure.		
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes. Detailed within procedure.		

Stage #3

Best practice 'should' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	n/a		
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the	n/a		

	proposed timeliness of a landlord's response.			
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Section #6 – Putting things right

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes. Detailed within procedure		
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes. Detailed within procedure		
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes. Detailed within procedure		
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes. Compensation policy.		
Best practice 'should' requirements				

Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes. Detailed within procedure		
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes. Detailed within procedure		

Section #7 – Continuous learning and improvement

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes. Reported in Annual report, via website, via Service Champions (involved tenants) and to Board.		
Best practice 'should' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint		TBC – Proposed that role of Chair of new Customer Voice Panel include this responsibility.	Arrangements to be confirmed on establishing new Customer Voice Panel

	handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.			[Target 30/09/2022 – Director of Customer and Communities]
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, <ul style="list-style-type: none"> • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling <ul style="list-style-type: none"> • Code for scrutiny and challenge. 		In part currently; full requirements to be included in content of future reporting to new Customer Voice Panel when established.	<p>Arrangements to be confirmed on establishing new Customer Voice Panel</p> <p>[Target 30/09/2022 – Director of Customer and Communities]</p>
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	<p>Yes.</p> <p>Complaints report received regularly by Executive Team.</p>		<p>Complaint review meetings with senior managers and executive directors to be established.</p> <p>[Target 31/08/2022 – Director of Customer and Communities]</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and 		Proposed to be introduced for all colleagues in 22/23.	<p>Objective introduced at mid point review</p> <p>[Target 30/09/2022 – Director of People]</p>

	<p>departments</p> <ul style="list-style-type: none"> take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 			
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Section #8 – Self-assessment and compliance

Mandatory 'must' requirements				
Code Section	Code requirement	Comply – Yes (with evidence, commentary, and any explanations)	Comply – No	Action
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	<p>Yes.</p> <p>Copies available on website.</p>		<p>To be included in stat. annual returns list monitored by Governance Team.</p> <p>[Target 01/08/2022 – Governance Manager]</p>
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	<p>Yes.</p> <p>Detailed within procedure.</p>		
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance. 	<p>Yes.</p> <p>Detailed within procedure.</p>		