

Housing Ombudsman Complaint Handling Code

Our self-assessment: 21 June 2024

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 resident or group of residents.'</i>	Yes	Complaints Policy and complaints procedure www.octaviahousing.org.uk	This definition is included in Section 2.1 of Complaints Policy and section 4 of our Complaints Procedure.
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	Yes	Complaints Policy and Procedure	Section 2.2 and 2.5 of the Complaints Policy and section 4 of our Complaints procedure confirms these requirements. The policy explicitly highlights a third party, acting on behalf of a resident/customer, will be accepted.

	in line with the landlord's complaints policy.			Our CRM system allows us to log when a third party/representative has raised a complaint on behalf of a resident.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy and Procedure	Section 2.4 and 8.1 of our Complaints Policy and section 4 of our complaints procedure clearly outlines what constitutes a complaint, emphasising the importance of recognising the difference between a formal complaint and service requests. Our CRM system allows for service requests to be logged, monitored and reviewed.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy and Procedure	Section 2.5 of our Complaints Policy and section 4 of our Complaints procedure states that we will do this.
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	Yes	Complaints Policy and Sample Feedback Survey	Section 2.3 of our Complaints Policy states that we will do this. Our tenant satisfaction measures (TSM) survey interview scripts

	complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			carried out by a third-party supplier and our resident feedback survey forms refer residents to our complaints process and gives information on the ways to make a complaint.
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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 Complaints Procedure	Section 4.1 of our Complaints Policy and section 5.7 of our Complaints Procedure lists the reasons when a complaint is not accepted. We will consider each complaint on its own merits.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents.	Yes	Complaints Policy and Procedure	Section 4.1 of the Complaints Policy and section 5.7 of our Complaints Procedure includes the circumstances in which a matter will not be considered under the complaints process.

	<p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • 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. • Matters that have previously been considered under the complaints policy. 			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	Complaints Policy and Procedure	Section 4.1 of our Complaints Policy and section 5.8 of our Complaints procedure confirms that we will do this.
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the</p>	Yes		Section 4.1 of our Complaints Policy states that we will do this. Whilst Section 5.9 of our Complaints Procedure, confirms that we will

	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.		Complaints Policy and Procedure	confirm in writing any decision not to accept a complaint and a resident's right to take that decision to the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy and Procedure	Section 4.2 of our Complaints Policy and 5.7 of our Complaints procedure states that we will consider each complaint on its own merits and make sure our decision is reasonable.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary & explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must	Yes		Section 6.2 of the Complaints Policy describes the different channels we accept complaints through: in writing - by letter or email, by digital form on website, by telephone and in person.

	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.		Complaints Policy Reasonable Adjustments Policy	<p>Section 13 of our Complaints Policy outlines our commitment to equality diversity and inclusion (EDI).</p> <p>All staff undergo annual mandatory EDI training.</p> <p>To meet the diverse communication needs of our residents, when required, Colleagues will tailor the provision of services in accordance with our Reasonable Adjustments policy.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Policy and Complaints Procedure	<p>Sections 6.1 & 6.7 of our Complaints Policy and 5.1 of our Complaints Procedure describe the different ways customers can report complaints.</p> <p>All staff are made aware of the process for passing cases to our Complaints. This is done via Team meetings, via internal briefings and communication events with colleagues. We have a dedicated Complaints email address for receiving complaints both internally and externally.</p> <p>Further training for all new/existing staff members has been developed by our Learning and Development Team and a phased roll out commences in July 2024.</p>

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	Octavia is committed to providing a high quality, well-publicised and accessible complaints process.	<p>We recognise the value and learning that complaints provide to enable service improvements.</p> <p>Wording will be added to the footer of Governance reports and performance reports shared with colleagues. This will support the embedding of the corporate standard complaint objective to foster a positive complaint handling culture.</p>
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	<p>Complaints Policy Complaints Procedure Internal complaints process (ICP) External Complaints Process Reasonable Adjustments Policy Complaints Website Pages</p>	<p>Section 9 of our Complaints Policy provides details of our two-stage complaint process.</p> <p>Our Reasonable Adjustments Policy describes how we will make our services accessible for all residents.</p> <p>The complaints policy can be made available in alternative formats upon request.</p>

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 Newsletters, resident notice boards, Annual Resident Report,	Section 14 of our Complaints Policy explains how we will publicise the policy. Sections 1.4 and 10.12 includes information about the Housing Ombudsman Service and the Complaint Handling Code.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy	Section 5.1 of our Complaints Policy explains that we will do this. We will ensure that we have the consent of the resident either by way of a signed Third-Party Representation Authorisation form or when the resident is present with a representative at the time and gives verbal permission to discuss the complaint whilst they are together.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy And Procedure	Section 10.1.2 of our Complaints Policy explains that customers can contact the Housing Ombudsman at any stage of the Complaints Process. Information on the right to access the Housing Ombudsman is included throughout our complaints process Relevant response template letters provides residents with information on their rights to access the Ombudsman.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary and explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints Policy and Procedure	<p>We have a dedicated Complaints Resolution Team in place supported by a Customer Experience Improvement Manager.</p> <p>We produce regular reports to the governing body and Resident Panel as described in Section 11 of our Complaints Policy and 12.5 of our Complaints Procedure.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints Policy	This is included within Section 7.1 of our Complaints Policy. The Complaints Officer role is fulfilled by our Complaints Resolution Team, led by our Customer Experience Improvement Manager.
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	Complaints Policy Complaints Procedure People and Culture Strategy Behaviours & Values Framework (4Rs)	<p>Section 7.1 of our Complaints Policy describes the training and values Complaints Officers and Complaint Handlers will apply to managing complaints.</p> <p>Section 12 of our Complaints Procedure details our approach to staff training,</p>

				<p>continuous improvement and lessons learnt.</p> <p>Action: Further training has been developed by our Learning & Development Team training relevant for new and existing staff. The phased rollout of the training programme commences in July 2024. This will be mandatory training for all colleagues and will form part of our Learning & Development Essential Framework, which will have an annual re-certification process.</p>
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No		Evidence, commentary & explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy and Procedure	We have a single Complaints Policy. Residents receive equitable treatment if they made a complaint.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0')	Yes	Complaints Policy and Procedure	Our Complaints Policy and Procedure has two stages only.

	or 'informal complaint') as this causes unnecessary confusion.			
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 Procedure	Our Complaints Policy and Procedure has two stages only.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	N/A	All complaints are handled within Octavia.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	All Complaints are handled within Octavia
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Complaints Policy and Procedure	<p>This is explained within Section 9 of our Complaints Policy</p> <p>Sections 5.14 and 7.7 of our Complaints Policy detail that we will set out the complaint definition to the resident.</p> <p>Our standard acknowledgement template letters contain relevant paragraphs to clarify our understanding of the complaint and the outcomes the resident is seeking. If any aspects are unclear, the Complaints Team will seek clarification</p>

				from the resident/ (or representative – if applicable) to log the complaint accurately.
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 Procedure	<p>This is covered in section 9 of our Complaints Policy and is incorporated within the standard Stage 1 and Stage 2 acknowledgement template letters.</p> <p>Sections 5.12 set out that we will call the resident to get a clear understanding of the complaint, if this is required.</p>
5.8	At each stage of the complaints process, complaint handlers must: <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	Complaints Policy and Procedure	<p>This is detailed within Section 7.1 of the Complaints Policy and Section 3.5 of our Complaints Procedure</p>
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.	No	Complaints Policy and Procedure	<p>Section 9 of our Complaints Policy and 5.21 of our Complaints Procedure explains that we will do this.</p> <p>Action: Updating our CRM System will ensure we are consistent in recording agreed intervals outside of timescales for keeping residents updated on our CRM system and monitored regularly by the</p>

				Customer Service Improvement Manager. This will be complete by September 2024.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints Policy Reasonable Adjustments Policy	13.2 of our Complaints Policy explains that we will make reasonable adjustments and keep records of these.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaints Policy Procedure	Section 4.1 of our Complaints Policy and 5.7 of our Complaints Procedure describes the reason we would not escalate a complaint. The decision to refuse to escalate a complaint is determined by the nominated complaint lead detailed in our Complaints Procedure.
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	Complaints Policy and Procedure	All correspondence with the resident and other parties is stored within IT systems, and described throughout our Complaints Procedure Action : consistent adoption of the Customer Relationship Management (CRM) case management system is required to ensure all complaint correspondence and documents are stored in a single location.

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	Complaints Policy and Procedure	Our policy explains how we will remedy at any point in the complaint process. See Section 9 Section 10 of our Complaints Procedure describes our approach to remedies and putting things right
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	Unacceptable Customer Actions Policy	We have an Unacceptable Customer Actions Policy , and this is used to manage unacceptable behaviours when managing complaints.
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	Unacceptable Customer Actions Policy	This is set out in out in our Unacceptable Customer Actions Policy

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary & explanation
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6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy and Procedure	This is explained within Section 7 and 9 of the Complaints Policy and this process is detailed within our Complaints procedure. Cases will be triaged according to vulnerabilities and risk and prioritised accordingly. Relevant colleagues' role profile reflects the need to support vulnerable residents or residents at-risk.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Complaints Policy and Procedure	Section 9 of our Complaints Policy and 5.13 of our Complaints Procedure explains this requirement.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	Complaints Policy and Procedure	Section 9 of our Complaints Policy and 5.18 of our Complaints Procedure. Action: We have identified system and workflow improvements to consistently achieve response times and revised timeframes agreed with residents. This will be completed by September 2024.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the	Yes		Section 9 of our Complaints Policy and 5.21 of our Complaints Procedure states that we will do this.

	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.		Complaints Policy and Procedure	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy and Procedure	This is outlined within Section 9 of our Complaints Policy and 5.21 of our Complaints Procedure. The Housing Ombudsman contact details are provided when extending a complaint response.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	No	Complaints Policy and Procedure	Where the answer is known, we provide a response to the complaint, as detailed in Section 5.19 of our Complaints Procedure. Action: We are improving the tracking of outstanding actions via our CRM and tracking system to ensure outstanding actions are dealt with expeditiously and regular updates are provided to residents as required. This will be completed by September 2024. We
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy,	Yes	Complaints Policy	Section 9 of our Complaints Policy states that when we receive a complaint we will investigate fully and ensure we address all relevant aspects. In addition, our complaint standard outcome letters clearly require all complaint leads to

	law and good practice where appropriate.			address every point of the complaint in line with our relevant policies, the law and good practice. Responses are also reviewed to align to customer needs.
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	Complaints Policy and Procedure	Any additional matters raised during the complaint investigation will be incorporated into the complaint (if relevant) and if the issue raised does not cause unreasonable delay to the complaint response. Section 9 of our Complaints Policy states that we will do this.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes	Complaint Policy and Procedure	This is part of the stage 1 response standard letter

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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 resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy and Procedure	Section 9 of our Complaints Policy describes this.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaints Policy and Procedure	Section 9 of our Complaints Policy and Procedure documents detail the timeframes
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to	Yes		Section 9 of our Complaints Policy and Procedure state this.

	understand why a resident remains unhappy as part of its stage 2 response.		Complaints Policy and Procedure	
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 Procedure	Each stage of an investigation is conducted independently Section 9 of our Complaints Policy explains this.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	No	Complaints Policy and Procedure	Section 9 of our Complaints Policy confirms our aims to respond to complaints within 20 working days. Action: We have identified system and workflow improvements to consistently achieve response times and revised timeframes agreed with residents. This will be completed by September 2024.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy	Section 9 of our Complaints Policy explains that we will do this.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with	Yes	Complaints Policy	Section 9 of our Complaints Policy states that we will do this.

	the contact details of the Ombudsman.			
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	No	Complaints Policy	<p>Section 9 of our Complaints Policy and Section 5.19 of our Complaints Procedure state that we will do this.</p> <p>Action: We are improving the tracking of outstanding actions via our CRM system to ensure they are both dealt with expeditiously and regular updates are provided to residents when known. This will be completed by September 2024.</p>
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	Complaints Policy	<p>Section 9 of our Complaints Policy states that when we receive a complaint we will investigate fully and ensure we address all relevant aspects. In addition, our complaint template outcome letters clearly require all complaint leads to address every point of the complaint scope.</p>
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage;	Yes		<p>This is part of the stage 2 response standard template letters</p>

	b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
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 Procedure	Section 9 of our Complaints Procedure states that all suitable staff must be involved in the stage 2 response.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary & explanation
7.1	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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; 	Yes	Complaints Policy and procedure	Sections 9 of our Complaints Policy and 10.2 of our Complaints Procedure describe that we will do this. Within Stage 1 and 2 of our template letters, we state our approach to complaints as being that we: <ul style="list-style-type: none"> • Listen and understand. • Say sorry when we have got it wrong.

	<ul style="list-style-type: none"> • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<p>Response Template Letter</p>	<ul style="list-style-type: none"> • Put things right. • Learn and improve. <p>Our complaint handlers have the authority to put actions in place to put things right. The complaint closure letters clearly require the complaint handler to confirm the actions taken to put things right and any outstanding actions that are required. The team have agreed processes they follow including a compensation guide.</p> <p>We also share Spotlight reports with colleagues to raise awareness of good practice and the Housing Ombudsman Guidance on remedies.</p> <p>Action: For CRM to enable an action tracker, learnings, and training feedback that can be shared with colleagues. We also share the spotlight reports from the Housing Ombudsman to ensure that we consider the recommendations put forward and implement where reasonable and practicable to do so.</p>
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7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy Complaints Procedure Compensation Policy	<p>We have a Compensation Policy and Procedure to ensure appropriate remedy for service failures.</p> <p>Sections 9 of our Complaints Policy and 10.3 of our Complaints Procedure state that we will take account of the impact on you of any faults identified when offering a solution.</p> <p>Section 10.9 of our Complaints Procedure includes a link to the Housing Ombudsman's Guidance on Remedies web page. remedies web page.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	No		<p>Complaint handling template response letters ensures remedy offers and remedial actions are clearly set out.</p> <p>Section 9 of our Complaints Policy explains that we will track promptly any actions that are outstanding after we issue our response, and keep you informed. We will ensure we follow the solution offered through to completion.</p>

				Action: As part of the service improvement plan, CRM and tracker systems to be developed recording remedial actions and ensure these are followed through to completion. This will be completed by September 2024.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Procedure	A link to the Housing Ombudsman's guidance on remedies is provided in 10.9 of our Complaints Procedure.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary & explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.	Yes	Complaints Policy	Section 11.1 of our Complaints Policy states that we will produce the annual complaints performance service improvement report. The Members Responsible for Complaints (MRC) have responsibility for ensuring this

	<p>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>		Published Annual Complaints Performance and Service Improvement report on website	is provided to the governing body for challenge and scrutiny.
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 on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes	Complaints Policy	<p>Following each self-assessment, we will report the performance and service improvement report to the governing body and publish on our website, alongside our governing body's response to the report. This is detailed in Section 11.1 of our Complaints Policy.</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaints Policy	This is stated in section 11.1 of our Complaints Policy.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Complaints Policy	This is stated in section 11.1 of our Complaints Policy.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Business Continuity Plan	Our new BCP documentation has been updated to include reference to the Ombudsman Code

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.	No	Complaints Policy Feedback from residents' meetings and the development of	Section 11 of our Complaints Policy describes our approach to lessons learnt and continuous improvement. Action: improvements to CRM will enable us to create

			associated action plans e.g. Development sites and the Survey of Tenants and Residents (STAR)	dashboards and identify areas of further scrutiny Additional improvements to be made at local level for speed of resolution - complaint handlers e.g. Estate and Housing colleagues. These will be completed by September 2024.
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.	No	Complaints Policy and Procedure	Section 11 of our Complaints Policy describes our approach to lessons learnt and continuous improvement. Action: Consistent use of CRM (interim system) will support this so we can report on themes to drive continuous improvement and learning. This will be completed by September 2024. Enhanced training for relevant colleagues devised with phased roll out July 2024
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.	No	Regular reports to the Resident Panel, Service Quality Committee, Leadership and Colleague Briefings Annual report and benchmarking	We produce regular performance reports to the governing body, relevant committees, Resident Panel and colleagues. We now have an agreed standard organisational complaint objective for

				<p>colleagues which will support the embedding of a customer centric focus.</p> <p>Action: Consistent use of CRM (interim system) will support this so we can report on themes to drive continuous improvement and learning. This will be completed by September 2024.</p> <p>Enhanced training for relevant colleagues devised with phased roll out starting from July 2024</p>
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		We have appointed our Assistant Director of Customer Experience, Insights and Partnerships who is accountable for this.
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	Executive Director of Operations, Ralph Facey, is the Member Responsible for Complaints (MRC)

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		This is an agenda item on regular Board meetings.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Complaints Policy	Specified in section 11.1 of our Complaints Policy.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:	Yes		We have a standard objective devised for all colleagues. Action: Organisational roll out and implementation commenced June 2024 -

	<p>a. have a collaborative and co-operative approach towards resolving complaints, working 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>		Complaints Policy	Customer facing roles prioritised by adopting a whole organisational and proportional approach
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