

Places for People Self-Assessment 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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We have adopted this complaint definition which is included in our internal policy and reflected in the complaints handling information we publish for Customers.
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 a complaint. A complaint submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	All expressions of dissatisfaction, however received, are treated within our complaints policy. This includes issues raised via all channels of communication. We encourage Customers to tell us where something has gone wrong, or where they are dissatisfied with our service so that we can put it right quickly. Customers have the choice to make a stage 1 complaint, as set out in our complaints handling information.

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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>We support the earliest resolution of complaints and try to resolve service requests quickly. They are recorded as a “Put it Right” for action and resolve. “Put it Rights” are logged and monitored in our complaints handling system. At any time, the Customer has the choice to progress their complaint to stage 1.</p>
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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>We work with our Customers to “Put it Right” quickly. If we are unable to agree on a resolution, or the matter needs further investigation, our Customers have the choice to escalate for investigation at stage 1. At present, escalated service requests are managed within the relevant business areas.</p> <p>In 2024-25 we are introducing a new Early Resolution Team of circa 20-25 Advisors to bring management of escalated service requests into the Customer Hub. This will ensure escalation to stage 1</p>

				within 5 working days where a resolution has not been agreed.
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	This is embedded into our survey	When Customers complete a survey, they receive information about how to complain if they wish to do so. Survey results are analysed and our Customer Experience Team follow up any remaining issues directly with Customers. In 2024-25, the centralised Complaint Team will take responsibility for this to ensure a more cohesive process for Customers.

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	Click here to view our Complaints Handling Procedure	We comply with this and clearly state when we will not accept a complaint, within the complaints handling information we publish for Customers.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. 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. 	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	Please see pages 3 and 4 of the Complaints Handling Procedure we publish for Customers. Our full policy is available on our website.

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			
2.3	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.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	We accept complaints within 12 months of the issue happening. We will apply discretion where appropriate. This is set out in the Complaints Handling Procedure we publish for Customers.
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 they 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	<p>Click here to view our Homes Plus Complaints Policy</p>	Our published policy confirms our approach. If we decide not to accept a complaint, we will provide an explanation, set out the reasons why the matter is not suitable for our complaints process, and highlight the right for the Customer to take that decision to the Housing Ombudsman. The Complaints Leadership Team oversee all internal refusals to access the complaints process.
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	<p>Click here to view our Homes Plus Complaints Policy</p>	Our policy confirms we will consider each complaint on its own merit and be clear

	must consider the individual circumstances of each complaint.			about any aspects of a complaint we are not responsible for. Our Customer Focus Team and Complaint Handlers are trained in the triaging and assessment of complaints.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Internal Complaint Handling Record</p>	We accept complaints through a variety of channels. Our published policy and Complaint Handling Procedure for Customers sets this out and confirms our approach, which is in line with the Equality Act 2010. A Complaint Handling Record is used to help us identify any communication preferences or reasonable adjustments, to support our Customers access the complaints process.
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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p> <p>People Promises Customer Promises</p>	Our complaints service is fully accessible to Customers and our published information sets out that we can accept a complaint verbally, in writing, face to face, by phone, email, online or via social media. A complaint handling

				<p>system is accessible to all members of our Colleagues and enables them to raise escalated service requests and complaints to our Complaints Team. Our internal training academy system contains complaint handling modules and is part of our induction and training process for relevant Colleagues.</p> <p>Our People and Customer Promises, launched in 2023-24 set out our expectations for all Colleagues.</p> <p>Colleague events have taken place to embed these Promises in frontline services.</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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p> <p>Complaints reports to Board, National Customer Group and SLT</p>	<p>We value and encourage Customer feedback and complaints, as part of our Customer promises.</p> <p>Complaint volumes are monitored daily and root cause analysed and shared through regular collaboration meetings with service leads.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	<p>Click here to view our Complaints Handling Procedure</p>	<p>Our policy is available on our website and details the process. Customers can</p>

	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.		<u>Click here</u> to view our Homes Plus Complaints Policy	contact us for alternative versions of this information, such as in a different language or braille, or contact an interpreter via our website accessibility page. Currently we present our publications as downloadable PDFs which don't work with assistive technologies. We are going to improve this facility by creating dedicated pages for publications in the near future and will be producing an easy read complaints leaflet in 2024-25.
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	<u>Click here</u> to view our Homes Plus Complaints Policy	Our policy sets out that we publish details of our complaints policy and details on how to make a complaint. We will be strengthening our policy and adding contact details for the Housing Ombudsman during Quarter 2 of 2024-25.
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	<u>Click here</u> to view our Complaints Handling Procedure <u>Click here</u> to view our Homes Plus Complaints Policy	We welcome and encourage advocacy. We set this out in our published information, which can be found on page 6-7 of our Complaint

			<p>Click here to view the easy read version of our Equality, diversity and inclusion policy.</p>	<p>Handling Information. We encourage advocacy at meetings and will further strengthen this document in Quarter 2 of 2024-25 to reflect that.</p>
3.7	<p>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.</p>	Yes	<p>Click here to view our Complaints Handling Procedure (sent with complaint acknowledgement)</p> <p>Click here to view our Make a Complaint England webpage</p> <p>Internal acknowledgement template</p>	<p>This information is set out in our Complaint Handling Information on page 6, and our webpage advises Customers of their right to contact the Housing Ombudsman at any time. We will further strengthen our Complaint Handling Information in Quarter 2 of 2024-25 to ensure Customers know they can access the services of the Housing Ombudsman at any time for advice and guidance. A copy of our complaints handling information is sent to Customers with the Stage 1 acknowledgement and this is reiterated in the template Stage 1 acknowledgement wording.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>We are resourced centrally and within business areas to handle complaints.</p> <p>Internal Board, National Customer Group, SLT and MRC reports.</p>	<p>Within our Customer Hub, we have a centralised team of dedicated Customer Resolution Coordinators who manage complaints at Stage 1, and complaint handlers at Stage 1 and 2 of the process within service areas.</p> <p>In addition, we have an Ombudsman Caseworker, data analysts and a service improvement lead within our complaints function.</p> <p>Our Customer Focus Team undertake a triaging and assessment role. We are working towards centralising all complaint handling, including escalated service requests, within 2024-25 to further improve the Customer journey.</p> <p>Our complaints insight is shared regularly with service leads, our National</p>

				Customer Group, and the Group's governing body.
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	<p>Our Customer Resolution Coordinators are fully trained and have autonomy to resolve complaints.</p> <p>Communication channels are in place and complaint handlers attend regular collaboration meetings</p>	<p>Our complaints handling system supports a linear process with a 360-degree view of the complaint through each stage. It enables complaint handlers to set tasks and liaise with relevant service leads to support action and resolution and for the Customer.</p>
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	<p>Our complaints team within the Customer Hub is resourced to handle and analyse complaints.</p> <p>Internal Academy training modules</p> <p>Internal induction training for Customer Resolution Coordinators</p> <p>Internal Board, National Customer Group, SLT and MRC reports</p>	<p>Our internal training academy software contains modules on complaint handling and these form part of induction training. All new Customer Resolution Coordinators undergo an intensive 2-week training and induction course. In 2024-25, effective complaint handling was introduced as an objective for all relevant Colleagues. We are continuing to grow and centralise the team in 2024-25. Complaints insight is shared regularly with our National Customer Group and our governing body.</p>

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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	We have a single complaints policy and Customer Complaint Handling Procedure on our website. This sets out how we deal with complaints on their merit, and our support to help Customers complain. It is further supported at triage and assessment stage where we explore and identify key vulnerabilities, communication preferences or the requirement for reasonable adjustments.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	We operate a 2-stage process. We want to support Customers as quickly as possible, so when we receive an escalated service request, we log this as a "Put It Right" and try to agree resolution within 48 hours. If we are unable to do this, or the Customer wishes to

				complain at stage 1, we facilitate this. We actively monitor “Put it Rights” daily to ensure escalation to stage 1 where required. We recognise that there can be delays in logging complaints at stage 1, so we are working towards having a centralised team in 2024-25 to further improve our complaint handling process.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	We operate a 2-stage process.
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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>We operate a 2-stage process.</p> <p>Our Customers have the option to escalate to our Independent Complaints Panel (ICP), or the Housing Ombudsman, or both, after stage 2. We are currently reviewing our ICP function with a view to further improving this facility.</p>

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<p>The Residential Management Group is part of the Places for People Group and handles complaints for some of our leaseholders.</p> <p>Click here to view the RMG Complaints page</p> <p>Internal RMG Service level Agreement</p> <p>Routine performance meetings with RMG</p>	<p>Where we have managing agents in place, they are expected to handle complaints in line with the relevant Ombudsman, be that Housing Ombudsman or Property Ombudsman. This is set out in the relevant SLA.</p> <p>There is an ongoing project within our Home Ownership Team to further increase our scrutiny and oversight of 3rd party complaints handling.</p>
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	<p>We use standardised letter templates for acknowledgement and response for consistency in meeting the code.</p> <p>Internal Stage 1 acknowledgement template</p> <p>Internal Complaint Handling Record</p>	<p>Our letter templates are embedded into our complaints handling system and are supported by a complaint handling record to ensure the complaint definition is explored and clarified.</p>
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	<p>We use standardised letter templates for acknowledgement and response for consistency in meeting the code.</p>	<p>Our letter templates are embedded into our complaints handling system and are supported by a complaint handling record so that it is clear to the</p>

				customer what we can investigate.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p>Click here to view our Homes Plus Complaints Policy</p>	<p>Our Customer Resolution Coordinators are independent from frontline services. They are trained to complete an impartial review and follow the principles of “Put it Right”, fairness, and learning from outcomes. This is set out in the foreword and body of our policy. We plan to strengthen our policy and improve on Customer information available in Quarter 2 2024-25 regarding how we conduct investigations.</p>
5.9	<p>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.</p>	Yes	<p>Our complaints handling system includes an extension management tool</p> <p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>This is set out in our policy on page 6. Our Customer Resolution Coordinators are trained in the process of extending complaints. Our complaints handling system supports the management of this. Attempts are made to contact the Customer to agree an acceptable extension.</p>
5.10	<p>Landlords must make reasonable adjustments for residents where</p>	Yes	<p>Click here to view our Complaints Handling Procedure</p>	<p>Our policy has been subjected to an equality</p>

	<p>appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>		<p><u>Click here</u> to view our Homes Plus Complaints Policy</p>	<p>impact assessment and directly references our statutory duties on page 10-11 of our policy.</p> <p>Exploration of any adjustments required is a standard part of our triage and assessment process carried out by our Customer Focus Team and Customer Resolution Coordinators.</p> <p>Close liaison with Customers throughout the process is key to our approach.</p> <p>There is a facility within our system to record disabilities with the Customer's consent. At present, these are not actively reviewed, and our Inclusion team are working on requirements to facilitate this approach.</p>
5.11	<p>Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.</p>	Yes	<p><u>Click here</u> to view our Complaints Handling Procedure</p> <p><u>Click here</u> to view our Homes Plus Complaints Policy</p>	<p>Our policy clearly sets out that we will accept a complaint unless there is a valid reason not to and confirms we will evidence our reasoning. In 2024 so far, we have only refused 1 complaint. We held a meeting with the Customer</p>

				which subsequently resolved matters.
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	We have a bespoke end to end complaint handling system.	Our complaint handling system is accessible to all Colleagues and supports the end-to-end process. It includes a document archive facility, the ability to make file notes, to set tasks and send emails. We introduced a Complaint Handling Record in May 2024, which captures the complaint investigation.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our policy is designed to ensure swift resolution, we aim to “Put it Right” within 48 hours where possible. Our Customer Resolution Coordinators are trained to be focussed on achieving swift resolutions for Customers.
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	Click here to view our Homes Plus Complaints Policy	Our policy is to deal with complaints on their merit. We make it clear in our policy that any unreasonable behaviour will be addressed in line with our Customer Behaviour and Warning Policy. Before the policy is enforced, we

				take steps to complete an equality impact assessment to better understand Customer needs and ensure full accessibility. On implementation of the policy, it is shared with the Customer, and they have the right to a review.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<u>Click here</u> to view our Homes Plus Complaints Policy	Before action is taken in line with our behaviour policy, we complete an equality impact assessment.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	Our policy is designed to ensure that Customers get swift resolutions. We aim to put right any escalated service requests within 48 hours wherever possible and monitor for escalation to Stage 1 where this is required or requested.
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-policy No-practice	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	If an escalated service request cannot be resolved to the Customer's satisfaction within 48 hours, it is logged as a Stage 1 complaint within 5 days of receipt. Please see page 5 of our Complaint Handling Procedure for Customers. We recognise that complaint volumes sometimes impact our ability to meet this element. We are making significant investment in our

				Complaints Handling Team. We are growing our team size in FY24/25 which will lead to improved service levels for Customers including acknowledging and resolving all complaints within timeframes.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes-policy No-practice	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p> <p>Routine insight reports and collaboration meetings with service leads.</p>	<p>Our policy states that we will respond within 10 days to all Stage 1 complaints. Please see pages 5 and 8 of our Complaint Handling Procedure for Customers.</p> <p>We recognise that, particularly with complex repairs-related complaints that there can be multiple steps to reach a resolution. We are working closely on root cause insight with service leads, to facilitate quicker outcomes and reduce the need for extensions to complaint handling timescales. We are making positive progress as we recruit and centralise our complaints handling operation.</p>
6.4	Landlords must decide whether an extension to this timescale is needed	Yes	Click here to view our Complaints Handling Procedure	As part of the process, attempts are made to

	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.		<u>Click here</u> to view our Homes Plus Complaints Policy	contact the Customer to agree an extension where required, to explain the reason for the requested extension, and to provide contact details for the Housing Ombudsman. This is found in our policy on page 6 and Complaint Handling Procedure for Customers on page 5.
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	<u>Click here</u> to view our Complaints Handling Procedure <u>Click here</u> to view our Homes Plus Complaints Policy	This is found in our policy on page 6 and Complaint Handling Procedure for Customers on page 5.
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.	Yes	<u>Click here</u> to view our Homes Plus Complaints Policy Internal CRM system task tracking function	The outcome of a complaint is communicated to the Customer upon completion as set out in our policy on page 7. The complaint handler is responsible for tracking through any post closure actions and to liaise with Colleagues for service delivery. In Quarter 1 of 2024-25, we introduced a new function to enable all post complaint actions to be

				<p>expeditiously tracked through our complaint handling system.</p> <p>In some instances, Customers do not want the complaint to be closed until all actions are complete.</p> <p>This act of closure can cause distress on occasion. We will follow this up with the Ombudsman for further guidance on these scenarios.</p>
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p> <p>Internal template response letter</p>	<p>This process is followed through template complaint response letters which can be amended to meet the needs to any specific Customer. In addition, our complaint handlers capture the definition in an internal complaint handling record. Our approach is set out in our policy on page 7, and we plan to further strengthen this point in our Complaint Handling Procedure for customers during Quarter 2 2024-25.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the	Yes	Click here to view our Complaints Handling Procedure	This is found in our policy on page 11 and set out on page 5 of our complaint handling

	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.		Click here to view our Homes Plus Complaints Policy Internal Stage 1 and 2 training	information to Customers. It forms part of the training for our Customer Resolution Coordinators and business wide complaint handlers.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; 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 stage 2 if the individual is not satisfied with the response. 	Yes	Internal template letters	The template we use for communicating a Stage 1 outcome includes the required information. In Quarter 2 2024-25 we plan to strengthen our policy and complaint handling information for Customers, to give more information on what they can expect in a typical response to a complaint.

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	Yes	Click here to view our Complaints Handling Procedure	The template we use for communicating a Stage 1 outcome includes

	2 of the landlord's procedure. Stage 2 is the landlord's final response.		Click here to view our Homes Plus Complaints Policy	information on how to escalate a complaint to Stage 2. Our approach is set out on page 5 of our Complaints Handling Procedure for Customers.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes-policy No-practice	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Internal complaint insight reports	This is a standard part of the process and is set out in our policy and Complaints Handling Procedure. We recognise that complaint volumes sometimes impact on our ability to meet this element. We are making significant investment in our Complaints Handling Team. We have grown our team to 35 colleagues, with 9 new Customer Resolution Coordinators in place. In Quarter 3 2024-25, we are introducing a new Early Resolution Team of circa 25 Colleagues to further improve our acknowledgement timescales.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains	Yes	Click here to view our Complaints Handling Procedure	When a complaint is escalated to stage 2, contact is made with the Customer if further clarification is required. Our approach is

	unhappy as part of its stage 2 response.			set out on page 5 of our Complaints Handling Procedure for Customers. In Quarter 2 2024-25 we plan to amend our policy to clarify the Customer does not need to explain their reason for escalation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Internal process of assignment	It is a standard part of our process for escalations to go to a different complaint handler or a more senior business lead. In Quarter 2 2024-25 we plan to amend our policy and Complaints Handling Procedure to provide more clarity for our Customers.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes- policy No- practice	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	The timescales are set out within our complaint handling policy. We monitor performance against these timescales as a key performance indicator which is reported internally. At present, Stage 2 responses are managed by service leads. We are working towards centralisation of Stage 2 complaints to improve oversight and performance.

				We recognise that, particularly with complex repairs related complaints that there can be multiple steps required to reach a resolution. We are working closely on root cause insight with service leads, to facilitate quicker outcomes and reduce the need for extensions.
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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	As part of the process, attempts are made to contact the Customer to agree an extension where required, to explain the reason for the request, and to provide contact details for the Housing Ombudsman. This is found in our policy on page 6 and complaint handling information for customers on page 5.
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	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	This is outlined in our policy on page 6 and Complaint Handling Information for Customers on page 5.
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Click here to view our Homes Plus Complaints Policy	The outcome of a complaint is communicated to the

	<p>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>			<p>Customer upon completion as set out in our policy on page 7. The complaint handler is responsible for tracking through any post-closure actions and to liaise with Colleagues for service delivery. In Quarter 1 2024-25, we introduced a new function to enable all post complaint actions to be expeditiously tracked through our complaint handling system.</p> <p>In some instances, Customers do not want the complaint to be closed until all actions are complete and closure causes distress. We will follow this up with the Housing Ombudsman for further guidance on these scenarios.</p>
6.18	<p>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.</p>	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p> <p>Internal template response letter</p>	<p>This process is followed through template complaint response letters which can be amended to meet the needs to any specific Customer. In addition, our complaint handlers capture the definition in an internal complaint handling record.</p>

				Our approach is set out in our policy on page 7 and we plan to further strengthen this point in our complaint handling information for Customers in Quarter 2 2024-25.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; 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. 	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>The template we use for communicating a Stage 2 outcome includes the required information. In Quarter 2 2024-25 we plan to strengthen our policy and Complaint Handling Procedure for Customers to give more information on what they can expect in a response.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>Our Stage 2 review process engenders collaboration from relevant service areas. In 2024-25, we will be introducing more quality audit and coaching sessions in complaint handling throughout the process.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • 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; • Changing policies, procedures or practices. 	Yes	<p>Click here to view our Complaints Handling Procedure</p> <p>Click here to view our Homes Plus Complaints Policy</p>	<p>Our Customer Resolution Coordinators work independently from the frontline business and are trained to seek opportunities for improvement. Template letters set out the required elements, and our complaint handling system has the capacity to log potential service improvements. Root cause analysis is completed, and service improvement opportunities are shared with leads and tracked through to completion.</p>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Internal Complaint handling Record</p> <p>Internal Compensation Policy</p>	<p>Training for Colleagues on complaint handling covers the need to ensure remedies offered are fair and proportionate. Our internal complaint handling record sets out the</p>

				requirement to consider the full scale of impact and our compensation policy is aligned with the Ombudsman's remedies guidance.
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.	Yes	Internal Compensation Policy Internal template letters	All remedy actions are set out in our response letters and agreed with our Customers where appropriate, actions are tracked by the complaint handler through to completion via our complaint system.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Internal Compensation Policy	Our compensation policy is aligned with the Ombudsman remedies guidance for a fair assessment of any redress due, based on scale of impact.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Click here to view Annual Complaints Performance and Service Improvement Report</p>	<p>Our annual report was published on 30 June 2024 and contains all the required elements.</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	Click here to view Annual Complaints Performance and Service Improvement Report	Our annual report was published on 30 June 2024 and contains all the required elements.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Where mergers take place, we commit to complete a new self-assessment within 12 weeks of that merger.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We do this as and when requested and are compliant with all current and previous Ombudsman Orders.
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.	N/A		Should there be a reportable incident we will follow the prescribed guidance.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>Click here to view Annual Complaints Performance and Service Improvement Report</p> <p>Internal Service Improvement Tracker</p>	<p>Our complaint handling system has the ability to log potential service improvements. Root cause analysis is completed, and service improvement opportunities are shared with leads and tracked through to completion. Details of service improvements are outlined in our annual complaints handling and service improvement report.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Click here to view Annual Complaints Performance and Service Improvement Report</p> <p>Click here to view Complaint Handling Policy</p> <p>Internal reports to MRC, SLT, NCG and Board</p> <p>Internal reports to service leads</p>	<p>Our approach is set out in our policy. Root cause analysis undertaken to identify any systemic issues or Customer pain points is undertaken regularly and shared with service leads. Opportunities for improvement are captured and tracked. Wider opportunities form part of insight for change programmes.</p>

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	<p>Click here to view Annual Complaints Performance and Service Improvement Report</p> <p>Internal reports to MRC, SLT, NCG and Board</p> <p>Internal reports to service leads</p>	<p>Our National Customer Group, Board, Service Leads and Colleagues receive regular complaints insight.</p> <p>In 2024-25, we plan to further strengthen this with a regular updates to our website on service improvements.</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	<p>Internal Customer Hub risk map</p> <p>Internal report to SLT</p>	<p>Regular complaints insight is shared with the Managing Director of Customer Hub as the accountable person. A Customer Hub Risk Map is in place and regularly reviewed.</p> <p>Service improvements are reviewed by the Managing Director monthly.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Scott Black, Chief Operating Officer, is the Member Responsible for Complaints	We are compliant with this requirement.

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	Report to MRC and Board Routine meetings with MRC	Routine meetings are in place with the Complaints Leadership Team to provide complaints insight to the MRC. This is presented at quarterly meetings of the governing body.
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		Routine meetings are in place with the Complaints Leadership Team to provide complaints insight to the MRC. This is presented at quarterly meetings of the governing body.
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: a. have a collaborative and co-operative approach towards resolving	Yes	Internal Objectives Customer Promises People Promises	In 2024-25, a standard objective for complaint handling was set for all relevant Colleagues, in line with our Customer and People Promises.

	<p>complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others;</p> <p>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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