

Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Guidance in colleague supporting procedures is consistent with the code:

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Y	<p>Definition in colleague supporting procedures is consistent with the code:</p> <ul style="list-style-type: none"> • P184j – Complaints and Service Requests – complaint definition clear in introduction to the document • Complaint Handler training material for Stage 1 process design • Content on Iknow reflects the correct definition of a complaint - iKnow it Complaints Terminology (sharepoint.com) • G184s – abbreviations page 1 • Website content: make a complaint • Complaints policy - section 4 Key definitions (page 5). Complaints policy downloadable from complaints process page. 	
1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Y	<p>Guidance in colleague supporting procedures is consistent with the code:</p> <ul style="list-style-type: none"> • P184j – Complaints and Service Requests – introduction to the document clarifies the difference between a complaint and a service request, the document provides guidance on how to manage each. • Content on iKnow reflects the correct definition of a complaint - iKnow it Complaints Terminology (sharepoint.com) 	

			<ul style="list-style-type: none"> Complaints policy: section 1 Policy Statement and standard 1 refer to encouraging positive and negative feedback. Complaints policy downloadable from complaints process page. G184s Using the complaints handling process (internal document) section 2 Page 4 states customers does not have to use the word 'complaint'. Section covers right to make complaints via 3rd party / representative. Internal briefing issued Jan 2024 re changing our approach to complaints (see appendix 4) 	
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.	Y	<p>Guidance in colleague supporting procedures is consistent with the code:</p> <ul style="list-style-type: none"> P184j – Complaints and Service Requests - introduction to the document clarifies the difference between a complaint and a service request, the document provides guidance on how to manage each. Contact Centre support tool provides guidance on service requests and complaints - Know it Dealing with Dissatisfaction (sharepoint.com) Web content: Complaints landing page and make a complaint page. G184s Using the complaints handling process (Internal document) – section 2 'what is a complaint' Internal briefing issued Jan 2024 re changing our approach to complaints (see appendix 4) 	

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.	Y	<p>Guidance in colleague supporting procedures is consistent with the code:</p> <ul style="list-style-type: none"> • P184j – Complaints and Service Requests introduction to the document clarifies the difference between a complaint and a service request, the document provides guidance on how to manage each. • Contact Centre support tool provides guidance on service requests and complaints - Know it Dealing with Dissatisfaction (sharepoint.com) • G184s Using the complaints handling process (Internal document) – section 8.1 • Guidance on complaints landing page and make a complaint page. 	
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.	Y	<ul style="list-style-type: none"> • April 2024; an additional section of text has been added to the end of all active surveys. This advises customers that their survey comments do not constitute a formal complaint or compliment. The text provides a link to the section of Home Group's website where the customer can formally log their complaint or compliment, should they wish to do so. 	

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		<ul style="list-style-type: none"> • Guidance in colleague supporting procedures is consistent with the code: • P184k – Receive and Review a Complaint – procedure covers exclusions versus accepting a complaint. Clear guidance for colleagues on required actions if a complaint is not accepted (section 3 – Exclusions). • Procedures refers to the Policy and Policy Compliance Notes regarding acceptable complaints and exclusions. • Complaints policy section 1. Complaints policy downloadable from complaints process page. • G184s Using the complaints handling process – section 2 & 6.4 	
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. 	Y	<ul style="list-style-type: none"> • PCN G184s – examples of exclusions from complaints handling process covered in G184s Using the complaints handling process (internal document) sections 2 and 7 States we should deal on case by case basis and give clear reasons to customer if we decide that complaints handling process is not appropriate • Complaints policy – section 2 Scope refers to unreasonable complaints being dealt with under G184c managing unacceptable behaviour policy which details what should be considered in making decision about the complaints 	

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 		<ul style="list-style-type: none"> Complaints policy downloadable from complaints process page. 	
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.	Y	<ul style="list-style-type: none"> G184s – Section 2 -exclusion of complaints Customer leaflet: available from make a complaint page. Website content: complaints process. 	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Y	<ul style="list-style-type: none"> P184k – Receive and Review a Complaint – Section 5 Managing an Exclusion and the procedure refers to the Policy and Policy Compliance Note for guidance on acceptable complaints and exclusions. Internal letter template reference ensures that the requirements are met - G184aa - Complaint not accepted letter template G184s section 2 & 7 	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	<ul style="list-style-type: none"> G184s section 2 & 7 	

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.	Y	<p>Complaints accepted online, via telephone, in writing, in person, via social media channels, via e-mail and via chat bot. The webform and internal complaints form used to capture complaint made in person were strengthened in review completed 23/24.</p> <p>P184k Received and Review a Complaint clarifies the different channels a complaint can be made – section 2 How Complaints are Received.</p> <p>Guidance on make a complaint webpage: <i>If you feel dissatisfied by something we've done there are many ways to make a complaint:</i></p> <p><i>Online: Fill in our online complaints form</i> <i>Write: Home Group, One Strawberry Lane, Newcastle upon Tyne NE1 4BX</i> <i>Call: 0345 141 4663</i> <i>Email: contactus@homegroup.org.uk</i> <i>In person to a colleague</i></p> <p><i>You might want to ask someone to make a complaint for you. That could be a friend, relative or an advocate. Just as long as you have given them permission to do so."</i></p> <ul style="list-style-type: none"> • Complaints Policy – standard 2 • G184s Using the complaints handling process (Internal document) section 4 	

			'How complaints may be made'	
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.	Y	<ul style="list-style-type: none"> • P184k Received and Review a Complaint clarifies the different channels a complaint can be made – section 2 How Complaints are Received. • Internal briefing issued Jan 2024 re changing our approach to complaints (see appendix 4) • Guidance notes written for business colleagues involved in the complaint process - P184w – Business Receive and Review a complaint and P184hh Managing a Complaint (Asset and Development) – documents cover end-to-end processes and roles within this. • G184r Complaints Overview and Governance Guidance Notes - Section 4 – Roles and Responsibilities. 	
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.	Y	<ul style="list-style-type: none"> • Website content: complaints in numbers and focus on complaints. • Weekly update CEO. • Standards – policy positive approach. 	
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.	Y	<ul style="list-style-type: none"> • Complaints policy can be seen in Appendix 1 of this document. • complaints process and leaflet via webpage 	

3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	<ul style="list-style-type: none"> • Complains policy Appendix 1 of this document. • Available to download on complaints process page. 	
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.	Y	<ul style="list-style-type: none"> • Complaints policy Appendix 1. Available to download on complaints process page. • Customer leaflet: available from make a complaint page. • Website content: make a complaint • G184s Using the Complaint Handling Process Guidance Notes – Section 6, Third Party Representation. 	
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.	Y	<ul style="list-style-type: none"> • All complaint letters have Ombudsman details on the footer. • Where appropriate the HOS details are contained within the body of the complaint letters. • G184s Using the Complaint Handling Process Guidance Notes – Section 3, Raising awareness of complaints and procedures and other places within the document. <ul style="list-style-type: none"> • Letter templates. • Home Life • Website • Leaflet • Sign Up Pack 	

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.	Y	<ul style="list-style-type: none"> • New process design launched 1/2/24 – the Complaints Team are the team responsible for complaint handling and are the contact point for the customer. • Role Profiles updated to reflect this responsibility. • G184r Complaints handling overview and governance (internal document). • The Head of Customer Service Centre leads on complaints practice • Internal briefing issued Jan 2024 re changing our approach to complaints (see appendix 4) 	
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.	Y	<ul style="list-style-type: none"> • New process design launched 1/2/24 – the Complaints Team will engage with Subject Matter Experts in the business as required on more complex, involved complaints. • Complaints reporting and Management Information enhanced to provide insight into any delays in the business that are impacting complaint actions • G184r – section 3 	
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	Y	<ul style="list-style-type: none"> • Training delivered to all colleagues in the business in Jan 2024 to communicate the complaint handling process and the importance of prioritising complaint actions. 	

	complaints are seen as a core service and must be resourced to handle complaints effectively		<ul style="list-style-type: none"> All Complaint Handlers have received training on the new process and their role within this. This is also embedded to the complaint handler induction programme. Quality Assurance completed on a sample of complaint cases to manage compliance to process and identify improvement opportunities. 	
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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.	Y	<ul style="list-style-type: none"> Complaints Policy – standard 1 states we will treat customers with respect and professionalism at all times Available to download on complaints process page. 	
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.	Y	<ul style="list-style-type: none"> Complaints Policy (Appendix 1). Available to download on complaints process page. 	
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.	Y	<ul style="list-style-type: none"> Complaints Policy (Appendix 1). Available to download on complaints process page. 	

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.	Y	<ul style="list-style-type: none"> Complaints Policy (Appendix 1) and policy scope – policy is applicable to others directly involved in delivering home group business activities’. Available to download on complaints process page. 	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	<ul style="list-style-type: none"> Complaints Policy (Appendix 1). policy scope – policy is applicable to ‘others directly involved in delivering home group business activities’. Available to download on complaints process page. 	
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.	Y	<ul style="list-style-type: none"> Stage One – Procedure guides to support colleagues with a stage one complaint and make it clear that when the complaint is acknowledged the complaints points, the customer's desired outcome and the scope of the complaint are clear. This is covered in procedure P184m – Acknowledging a Complaint – Sections 1 / 2 / 3. Stage 1 & 2 requirements covered in P184h Complaint Handling Process – Section 5, Process Steps. G184s Using the Complaint Handling Process Guidance Notes, Section 8 – Communicating with complainants. 	

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.	Y	<ul style="list-style-type: none"> • Stage One – Procedure guides to support colleagues with a stage one complaint make it clear that when the complaint is acknowledged the complaints points, the customer’s desired outcome and the scope of the complaint are clear. • This is covered in procedure P184m – Acknowledging a Complaint – Sections 1 / 2 / 3. • Stage 1 & 2 requirements covered in P184h Complaint Handling Process – Section 5, Process Steps. • G184s Using the Complaint Handling Process Guidance Notes, Section 8 – Communicating with complainants. 	+
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. 	Y	<ul style="list-style-type: none"> • Complaints policy standard 4 Timely and effective compliant handling. • G184s Using the complaints handling process (internal document), Section 8 - Handling Complaints, and Section 9 - Fairness When Handling Complaints. • System and permission restrictions enabled to ensure information recorded is confidential. • Centralised and Independent team 	
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	Y	<ul style="list-style-type: none"> • Guidance in colleague supporting procedures is consistent with the code: 	

	suitable intervals for keeping them informed about their complaint.		<ul style="list-style-type: none"> • P184r – Responding to a Complaint – introduction to the procedure and Section 2 – Response Letter to the Complainant. (Stage 1 of the complaints process) • G184s Using the Complaint Handling Process Guidance Notes – Section 2, Complaints Handling Process. • P184h Complaint Handling Process – Section 5, Process Steps. (stage 1 and 2 of the complaints process) 	
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.	Y	<ul style="list-style-type: none"> • Complaints Policy - Standard 2, Communication and Customer Involvement. • G184s Using the Complaints Handling Process Guidance Notes, Section 8.3 - Communicating with Complainants. • Vulnerability flags process / warning markers enabled where appropriate and relevant within our core systems 	
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.	Y	<ul style="list-style-type: none"> • G184s Using the Complaints Handling Process Guidance Notes – Section 2 – What is a Complaint. • Complaint response letter templates all include how complaints can be escalated if the complainant remains dissatisfied. 	
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	Y	<ul style="list-style-type: none"> • Stage 1 - the stage one complaint handling procedures make it clear that the Ulysses case record must be kept up to date at all stages of the investigation – notes and attachments (multiple procedure documents P184l Logging a Complaint, P184n Recording and 	

	any relevant supporting documentation such as reports or surveys.		<p>Acknowledgement Call and Letter, P184s Record a Response Call and Letter, P184y Closing a Case).</p> <ul style="list-style-type: none"> • Stage 1 and 2 - P184h Complaints Handling Process (internal document) section 5. • G184s Using the Complaints Handling Process Guidance Notes – Section 8, Complaint Handling Process. • Complaints policy standard 3 Confidentiality sets out compliance with data protection legislation etc Standard 5 refers to record keeping • Complaint handling system, enabling more governance tracking & monitoring 	
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.	Y	<ul style="list-style-type: none"> • G184s using the Complaint Handling Process Guidance Notes, Section 8 – Communicating with Complainants. 	Options within process to remedy at first point of contact G184s sect 8 – assess whether complaints can be resolved straight away without further investigation and at the end of each stage
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	Y	<ul style="list-style-type: none"> • G184c - Managing unacceptable behaviour 	

	putting any restrictions in place and must keep restrictions under regular 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.	Y	<ul style="list-style-type: none">• G184c - Managing unacceptable behaviour• Vulnerability flags / warning markers enabled where appropriate and relevant within our core systems	

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.	Y	<ul style="list-style-type: none"> • Stage One complaint handling process in place. (Appendix 5) • G184s section 8 (stage 1) • Policy section 2 Scope states that Matters that meet our definition of a complaint [...] will be dealt with under this policy and associated procedures even where another process is being followed – example of ASB process 	Stage One - Complaint Process Map - MI.pdf
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>	Y	<ul style="list-style-type: none"> • P184m – Acknowledging a Complaint – guidance throughout document. • G184s section 8 • Complaints Policy standard 1 and training set out requirement to follow required stages and timescales. Timeframe for acknowledgement and stage 1 / stage 2 responses are set out in appendix 1 of the policy • Policy section 2 Scope states that Matters that meet our definition of a complaint [...] will be dealt with under this policy and associated procedures even where another process is being followed – example of ASB process 	

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint – guidance throughout the document. • G184s section 8 	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint – introduction and then section 2 Responding to a Complaint. • G184s Using the complaints handling process (internal document) section 8.2.1 Extensions to time frame – also must be agreed with relevant director or senior leader. 	
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.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint, Section 2 confirms that the complainant must be provided with Ombudsman contacts. • G184s Using the complaints handling process (internal document) section 8.2.1 Extensions to time frame – also must be agreed with relevant director or senior leader. 	
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	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint – introduction to the procedure covers this requirement. • P184t – Complaint Action Plans – all outstanding actions are added to the complaints database to be tracked and managed promptly. 	

	promptly with appropriate updates provided to the resident.		<ul style="list-style-type: none"> • Response letters make it clear whether the complaint actions have been closed or whether they remain open. If they remain open a timeframe is provided – template references G184w – Stage 1 Response Letter. • Open actions post the response letter are tracked and managed by the Complaint Handler and reported to the business – owners responsibilities covered in P184t – Complaint Action Plans Sections 3 Tracking and Managing Actions, 4 Manager Dashboards and Section 5 Escalating Overdue Actions. 	
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.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint, Section 1 Response Call, and Section 2 Response Letter. • G184w – Stage 1 Response Letter – set template to capture requirements. • G184s Using the complaints handling process (internal document) section 8.3 	
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.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint covered in the introduction to the procedure. 	

6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 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 stage 2 if the individual is not satisfied with the response. 		<ul style="list-style-type: none"> • P184r – Responding to a Complaint, Section 2 Response Letter. • Response letters template structure as per code requirements, G184w – Stage 1 Response Letter. • G184s Using the complaints handling process (internal document) section 8.3 	
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	<p>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.</p>	Y	<ul style="list-style-type: none"> • Complaints Policy Standard 4 - Timely and Effective Complaint Handling and appendix 1 (complaints handling process) • P184h Complaints Handling Process (internal document), Section 5 Process Steps. • G184s Using the complaints handling process (internal document), Section 8.1.3. • Complaint Response letter template, G184dd Stage 2 Response Letter. 	
6.11	<p>Requests for stage 2 must be acknowledged, defined and logged at</p>	Y	<ul style="list-style-type: none"> • G184s Using the complaints handling process (internal document) section 8.1.4. 	

	stage 2 of the complaints procedure within five working days of the escalation request being received.		<ul style="list-style-type: none"> • 5 working days is our policy (Appendix 1. Available to download on complaints process page) and we measure this KPI. • Website 	
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 unhappy as part of its stage 2 response.	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • Customer leaflet: available from make a complaint page. • Website content: complaints process. • G184s Using the complaints handling process (internal document) section 8.1.3. 	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • P184h Complaints handling process (internal document) section 5, Process Steps. • G184s Using the complaints handling process (internal document), Section 8.1.4 - Stage 2. • Two-tier centralised complaints team which remains independent to other parts of our business, cementing impartiality and application of fairness for our customers. 	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Y	<ul style="list-style-type: none"> • Complaints Policy, 20 working days confirmed in the policy and measured via KPI - Complaints Policy, Appendix 1. 	

			<ul style="list-style-type: none"> • G184s Using the complaints handling process (internal document), Section 8.1.3. • P184h Complaint Handling Process, Section 5 Process Steps. 	
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.	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • P184h Complaints handling process (internal document), Section 6 Exceptions to Process. • G184s Using the complaints handling process (internal document), Section 8.2.1 - Extensions to time frame – also must be agreed with relevant director or senior leader. • Customer leaflet: available from make a complaint page. • Website content: complaints process. 	
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.	Y	<ul style="list-style-type: none"> • P184h Complaints handling process (internal document), Section 6 - Exceptions to process. • G184s Using the complaints handling process (internal document), Section 8.2.1 - Extensions to time frame – also must be agreed with relevant director or senior leader. 	

			<ul style="list-style-type: none"> • Customer leaflet: available from make a complaint page. • Website content: complaints process. 	
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.	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • P184h Complaint Handling Process, Section 5 Process Steps. • G184s Using the complaints handling process sect 8.3 	
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.	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • G184s Using the complaints handling process 	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied. 	Y	<ul style="list-style-type: none"> • Complaints Policy, Appendix 1. Available to download on complaints process page. • P184h Complaints handling process (internal document), Section 5, Process Steps. • G184s Using the complaints handling process (internal document), Section 8.3 - Communicating with complainants. • Stage 2 Response Letter Template captures the requirements - G184d 	

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	<ul style="list-style-type: none"> • Home Group have a two-stage process. • Complaints Policy, Appendix 1. Available to download on complaints process page. • G184s – Subject Matter Expert (SME) and independence 	

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. 	Y	<ul style="list-style-type: none"> • G184s – putting things right section 10 • Website: explained to customers on complaints process page. • Complaints policy appendix 1 	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		<ul style="list-style-type: none"> • G184s Using the complaints handling process (internal document) section 10 Putting things right 	

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.	Y	<ul style="list-style-type: none"> • P184r – Responding to a Complaint – stage 1 complaint guidance notes cover required discussion and letter content. • P184t – Complaint Action Plans – for stage 1 any actions that remain open post the response letter are added to the complaints database with a deadline date. • Stage 1 and 2 response letters will document actions taken to address the complaint points. It will be clear in the letter which of the complaint actions have been closed and which remain open. If they remain open a timeframe is provided on when they will be completed - G184w – Stage 1 Response letter template and G184dd Stage 2 Response letter. • Open actions post the response letter are tracked and managed by the Complaint Owner / Subject Matter Expert and reported to the business. • G184s – Section 10 • P184h – section 5 	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		<ul style="list-style-type: none"> • Complaints policy appendix 1 	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <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>	Y	<ul style="list-style-type: none"> • Yearly Performance Report (Appendix 6) • G184g Recording, reporting and learning from complaints (internal document) section 3 Reporting and publicising complaints. • The Board now receive regular updates and more recently a full review on complaints was on the agenda. • We provided a full breakdown on KPIs, volumes, trends from Stage 1 – Ombudsmen Adjudication • Also provided an update on our recent progress through our internal “special measures” • Quality Assurance Framework will support this requirement by providing additional insight into complaint handling performance. 	
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</p>	Y	<ul style="list-style-type: none"> • Yearly annual report – appendix 6 (to be attached) 	

	to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	<ul style="list-style-type: none"> Yearly annual report 	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	<ul style="list-style-type: none"> Yearly annual report 	
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.	Y	<ul style="list-style-type: none"> Yearly annual report 	

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.	Y	<ul style="list-style-type: none"> • Lessons Learned programme • Customer Scrutiny panel outputs • Customer involvement groups • G184q Recording, reporting, and learning from complaints (internal document) section 4 Learning from complaints 	
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.	Y	<ul style="list-style-type: none"> • Online learning module - Positive complaint handling culture • Internal briefing issued Jan 2024 re changing our approach to complaints (see appendix 4) • G184g Recording, reporting and learning from complaints (internal document) section 4 Learning from complaints 	
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.	Y	<ul style="list-style-type: none"> • Board Report • Complaints Scrutiny Group • Viewpoint Teams • Lessons Learned Programme • Complaints Training Hub • G184q Recording, reporting and learning from complaints (internal document) section 3 Reporting and publicising complaints and 4 Learning from complaints 	
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.	Y	<ul style="list-style-type: none"> • The Board now receive regular updates and more recently a full review on complaints was on the agenda. • We also have Executive Director sponsorship responsible for overall complaint handling • G184r Overview and governance of complaints (internal document) 	

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').	Y	<ul style="list-style-type: none"> • The Board now receive regular updates and more recently a full review on complaints was on the agenda. • We also have Executive Director sponsorship responsible for overall complaint handling • Chris Vallis (Senior Independent Board Member) is our MRC and links in regularly with board for complaints handling and is supported in this by the Company Secretary • G184r Overview and governance of complaints (internal document) • 	
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.	Y	<ul style="list-style-type: none"> • As above • G184r Overview and governance of complaints (internal document) • 	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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. 	Y	<ul style="list-style-type: none"> • The Board now receive regular updates and more recently a full review on complaints was on the agenda. • We provided a full breakdown on KPIs, volumes, trends from Stage 1 – Ombudsmen Adjudication • Also provided an update on our recent progress through our internal "special • G184q Recording, reporting and learning from complaints (internal document) section 3 Reporting and publicising complaints • G184r Complaints handling overview and governance (internal document) covers roles and responsibilities including Board 	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant	Y	<ul style="list-style-type: none"> • Objective identified In the complaints handling guidance. 	

	<p>employees or third parties that reflects the need to:</p> <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>		<ul style="list-style-type: none"> • Mandatory training for all colleagues through induction • Refresher training modules throughout the calendar year • Complaints is regular agenda item for discussion within senior management meetings • Working groups formed throughout the business units to ensure a joint approach to managing complaints • Section G184r Complaints handling overview and governance (internal document) covers roles and responsibilities for all colleagues 	
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Appendix

G184aa



G184aa - Stage 1
Complaint Not Accep

G184s



G184s Using the
Complaints Handling

G1854r



G184r Complaints
overview and governanc

G184q



G184q Recording,
Reporting and Learnir

G184dd



G184dd - Stage 2
Respond and Closed |



G184dd - Stage 2
Respond and Monitor

G184w



G184w - Stage 1
Respond and Close H



G184w - Stage 1
Respond and Monitor

P184j



1 - P184j - Business -
Complaints and Servi