

## Places for People's Self-Assessment against the Housing Ombudsman's Complaint Handling Code 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	All expressions of dissatisfaction, however received, are handled as per 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	We support the earliest resolution of dissatisfaction and try to resolve service requests quickly. We are introducing a triage and assessment process for expressions of dissatisfaction. If we can resolve quickly as a service request, we will. Service requests are recorded in our system and managed by our early resolution team. At any time, the Customer has the choice to progress their complaint to stage 1.
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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	If we are unable to agree on a resolution, or the matter needs further investigation, our Customers have the choice to escalate to stage 1. In 2024-25 we introduced a new Early Resolution Team to support the Customer complaints journey via a triage and assessment process.
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	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

	<p>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.</p>			<p>analysed for thematic trends and effort score.</p>
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Click here</a> 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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul>	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> 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"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	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	<a href="#">Click here</a> to view our Homes Plus Complaints Policy	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	<a href="#">Click here</a> to view our Homes Plus Complaints Policy	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 complaint team is 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  Internal Complaint Handling Record	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 triage and assessment exercise 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy  People Promises Customer Promises	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 Colleagues. Our internal training academy 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. Colleague events have taken place to embed these Promises in frontline services.</p>
3.3	<p>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.</p>	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> 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	<p>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.</p>	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> to view our Homes Plus Complaints Policy</p>	<p>Our policy is available on our website and details the process. Customers can 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.</p>



				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 25-26.
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	<a href="#">Click here</a> 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 strengthened our policy in 24-25 by adding contact details for the Housing Ombudsman.
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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy  <a href="#">Click here</a> to view the easy read version of our Equality, diversity and inclusion 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 Handling Information. We encourage advocacy at meetings.
3.7	Landlords must provide residents with information on their right to access the	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure	This information is set out in our Complaint Handling

	<p>Ombudsman service and how the individual can engage with the Ombudsman about their complaint.</p>		<p><a href="#">Click here</a> to view our Make a Complaint England webpage</p> <p>Internal acknowledgement template</p>	<p>Information on page 6, and our webpage advises Customers of their right to contact the Housing Ombudsman at any time. We strengthened our Complaint Handling Information in 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>
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## 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 an Early Resolution team, dedicated Customer Resolution Coordinators and Senior Customer Resolution Coordinators.</p> <p>In addition, we have two Ombudsman Caseworkers, data analysts and service improvement and change leads within our Customer Hub Complaints function. Complaints insight is shared regularly with service leads, our National Customer Group, and the Group's governing body.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<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>	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 for the Customer.

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. Complaints insight is shared regularly with our National Customer Group and our governing body.</p>
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> to view our Homes Plus Complaints Policy</p>	<p>We have a single complaints policy and Customer Complaint Handling Procedure on our website. This sets out how we deal with complaints and support to help Customers complain. It is further supported at triage and assessment stage where</p>

				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	<a href="#">Click here</a> to view our Complaints Handling Procedure <a href="#">Click here</a> to view our Homes Plus Complaints Policy	We operate a 2-stage process. We try to resolve matters as soon as possible as service requests. If we are unable to do this, or the Customer is not satisfied, we give Customers the choice to make a complaint.
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	<a href="#">Click here</a> to view our Complaints Handling Procedure <a href="#">Click here</a> to view our Homes Plus Complaints Policy	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	<a href="#">Click here</a> to view our Complaints Handling Procedure <a href="#">Click here</a> to view our Homes Plus Complaints Policy	We operate a 2-stage process across all our affordable housing stock. We handle all complaints about our service with the exception of our managing agents. They are members of the property ombudsman. Customers have the right to escalate to the HOS or the PO via their preferred route.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	The Residential Management Group and Touchstone are part of the Places for People Group and handles complaints for some of our leaseholders.	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. There is an ongoing project within our Home Ownership Team to review these processes.
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	We use standardised letter templates for acknowledgement and response for consistency in meeting the code.  Internal Stage 1 acknowledgement template  Internal Complaint Handling Record	Our letter templates are embedded into our complaints handling system and are supported by a triage and assessment process to ensure the complaint definition is explored and clarified.
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	We use standardised letter templates for acknowledgement and response for consistency in meeting the code.	Our letter templates are embedded into our complaints handling system and are supported by a triage and assessment process so that it is clear to the customer what we can investigate.

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<p><a href="#">Click here</a> 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.</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><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> to view our Homes Plus Complaints Policy</p>	<p>This is set out in our policy. 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. In 24-25 we introduced an internal contact cycle to set expectations for contact throughout the lifetime of a complaint.</p>
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act</p>	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p>	<p>Our policy has been subjected to an equality impact assessment and</p>

	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.		<a href="#">Click here</a> to view our Homes Plus Complaints Policy	<p>directly references our statutory duties.</p> <p>Exploration of any adjustments required is a standard part of our triage and assessment process.</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 a change project for Customer alerts.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> to view our Homes Plus Complaints Policy</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.
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	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 from service request to Ombudsman. It includes a document archive facility,



	any relevant supporting documentation such as reports or surveys.			the ability to make file notes, to set tasks and send emails. We introduced a Complaint Handling Record into the system 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	Our policy is designed to encourage swift resolution. Our Customer Resolution Coordinators are trained to be focussed on achieving resolutions for Customers as early as possible.
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	<a href="#">Click here</a> to view our Homes Plus Complaints Policy	<p>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 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.</p>

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	<a href="#">Click here</a> to view our Homes Plus Complaints Policy	Before action is taken in line with our behaviour policy, we complete an equality impact assessment.
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## 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	Our policy is designed to foster swift resolutions. We try to resolve service requests quickly. We identify the best route for resolve via a triage and assessment process and will escalate 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 <b><u>within five working days of the complaint being received.</u></b>	Yes-policy No-practice	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	<p>If a service request cannot be resolved to the Customer's satisfaction, we aim to log as a Stage 1 complaint within 5 days of being requested.</p> <p>At present we have a backlog of complaints as we transition from service area to centralised handling, and flex resource to meet demand fluctuations in the sector. There is a WIP</p>

				management plan in place to reduce this backlog.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes-policy No-practice	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy  Routine insight reports and collaboration meetings with service leads.	Our policy states that we will respond within 10 days to all Stage 1 complaints. 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.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	As part of the process, attempts are made to 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 and Complaint Handling Procedure for Customers
6.5	When an organisation informs a resident about an extension to these	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure	This is found in our policy and Complaint Handling Procedure for Customers

	timescales, they must be provided with the contact details of the Ombudsman.		<a href="#">Click here</a> to view our Homes Plus Complaints Policy	
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	<a href="#">Click here</a> 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. 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 function to enable all post complaint actions to be expeditiously tracked through our complaint handling system.
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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy  Internal template response letter	This process is guided by template complaint response letters designed to ensure the code is met. We aim to capture the definition and the resolution the customer is seeking through our triage and assessment process. Our approach is set out in our policy and procedure.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure	This is found in our policy and complaint handling information to Customers. It

	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.		<a href="#">Click here</a> to view our Homes Plus Complaints Policy  Internal Stage 1 and 2 training	forms part of the training for our Customer Resolution Coordinators. We allow scope widening at stage 1 however our policy sets out we will not add additional elements at stage 2. This is because we want to ensure all complaint elements follow a fair, two stage process as per requirements of the code.
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Internal template letters	The template we use for communicating a Stage 1 outcome includes the required information. We have strengthened our Customer Complaint information and policy to give more information about the handling and outcome of a complaint.

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	The template we use for communicating a Stage 1 outcome includes information on how to escalate a complaint to Stage 2. Our approach is set out in 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	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> 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 and have a WIP management process in place.
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.	Yes	<a href="#">Click here</a> 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 set out in our Complaints Handling Procedure for Customers. We recently updated 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.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes-policy No-practice	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	<p>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.</p> <p>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.</p>
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,	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	As part of the process, attempts are made to contact the Customer to explain why an extension is required, and to provide contact details for the Housing Ombudsman. This



	and the reason(s) must be clearly explained to the resident.			is found in our policy and complaint handling information for Customers.
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	<a href="#">Click here</a> to view our Complaints Handling Procedure <a href="#">Click here</a> to view our Homes Plus Complaints Policy	This is outlined in our policy and Complaint Handling Information for Customers.
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.	Yes	<a href="#">Click here</a> to view our Homes Plus Complaints Policy	The outcome of a complaint is communicated to the Customer upon completion as set out in our policy. 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.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure <a href="#">Click here</a> to view our Homes Plus Complaints Policy	This process is followed through template complaint response letters which can be amended to meet the needs to any specific Customer. In addition, our

			Internal template response letter	complaint handlers capture the definition in an internal complaint handling record. Our approach is set out in our policy.
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	The template we use for communicating a Stage 2 outcome includes the required information. In 25-26 we will be reviewing our suite of Customer letter templates.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="#">Click here</a> to view our Complaints Handling Procedure  <a href="#">Click here</a> to view our Homes Plus Complaints Policy	Our Stage 2 review process engenders collaboration from relevant service areas. In 2024-25, we introduced quality audit sessions in complaint handling.

## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p><a href="#">Click here</a> to view our Complaints Handling Procedure</p> <p><a href="#">Click here</a> 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	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	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.</p> <p>Our internal complaint handling record sets out the requirement to consider the full scale of impact and our</p>

				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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p><a href="#">Click here</a> 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	<a href="#">Click here</a> 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><a href="#">Click here</a> to view Annual Complaints Performance and Service Improvement Report</p> <p>Internal Service Improvement Tracker</p>	Our complaint handling system can 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.
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><a href="#">Click here</a> to view Annual Complaints Performance and Service Improvement Report</p> <p><a href="#">Click here</a> to view our Homes Plus Complaints 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.</p> <p>Opportunities for improvement are captured and tracked. Wider opportunities form part of insight for change programmes. In Q1 25-26 we are piloting a new</p>

				Feedback in Action Service Improvement Group, to bring together survey, complaint, and Ombudsman insight into one space with action planning for improvement.
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	<a href="#">Click here</a> to view Annual Complaints Performance and Service Improvement Report  Internal reports to MRC, SLT, NCG and Board  Internal reports to service leads	Our National Customer Group, Board, Service Leads and Colleagues receive regular complaints insight. In Q1 25-26, we plan to further strengthen this with quarterly updates to our website on service improvements.
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	Internal Customer Hub risk map  Internal report to SLT	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. Service improvements are reviewed by the Managing Director monthly.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for	Yes	Scott Black, Chief Operating Officer, is the Member Responsible for Complaints	We are compliant with this requirement.



	complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	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	Yes	Internal Objectives	In 2024-25, a standard objective for complaint

	<p>handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		<p>Customer Promises</p> <p>People Promises</p>	<p>handling was set for all relevant Colleagues, in line with our Customer and People Promises.</p>
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