

Paradigm Housing Group – April 2024

HOS Complaint Handling Code Self-assessment

Section 1: Definition of a complaint

Code Provision	Code Requirement	Comply: Yes/No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints Policy updated April 2024	The definition is included in the Complaints Policy.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Complaints Policy updated April 2024 A report will be used to identify where the word ‘complaint’ is captured in contact with a customer and regularly cross-check that against logged complaints to ensure all expressions of dissatisfaction are being logged as a complaint.	As per the definition, when customers raise dissatisfaction or where service requests are ongoing, staff are trained to offer the complaints process to customers (see roles and responsibilities of the Complaints Policy). The Complaints Policy and publication of it and supporting information on our website confirm complaints can be raised via a customer’s representative or advocate, subject to data protection requirements. In the event of an MP enquiry, we will contact the customer to advise an enquiry has been received from the MP. In the event the customer has not already accessed our complaints process this offer will be made to the customer and consent will be sought to

				share the response with the MP.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy updated April 2024	The difference between service requests and complaints is defined in the policy. Service requests are monitored and reviewed via our standard business performance reporting reviewed by the Executive and Amalgamated Board.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy updated April 2024	If a customer expresses dissatisfaction with the way a service request is being handled, the staff member must ensure a complaint is logged whilst ensuring the actions needed to address the service request are actioned.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Complaints Policy updated April 2024 Where technically possible, customers who respond to digital interaction surveys and express dissatisfaction, will receive an auto response signposting them to our complaints process.	Any expression of dissatisfaction with our service made through surveys will not be defined as a complaint however the third party appointed to undertake our ongoing perception surveys will inform customers of our complaints process if dissatisfaction is expressed. They will make us aware of it to follow up. Colleagues reviewing feedback via automated interaction surveys follow up with customers where dissatisfaction is expressed and make the customer aware of our complaints process.

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	Yes	Complaint Policy updated 2024.	All complaints will be accepted unless there is a valid reason not to do so and

	landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits			will consider the individual circumstances of each complaint before excluding any.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	Complaint Policy updated 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail any complaints have been refused.	Exclusions are detailed in the policy.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaint Policy updated 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail this.	All complaints will be accepted unless where the issue occurred over 12 months ago, (unless there is a justified reason for the delay i.e. ill health, health & safety issues, safeguarding issues or where a customer was unaware of a service failure until it had a detrimental impact) the complaint will not be considered. Discretion will be applied when necessary to ensure customers are not unfairly excluded from the complaint process.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided	Yes	Complaints Policy Updated 2024 and Template	No complaint will be unreasonably

	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.		responses	refused to be escalated through all stages of the complaints process. Where the Customer Resolution Team in liaison with a senior manager decides it is not appropriate to escalate a complaint, a full explanation will be given to the customer. At this point, it will be made clear that the response is a full and final response, and the customer will be provided with information on accessing the Housing Ombudsman Service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy Updated 2024	The complaint process will be objective in its approach and focussed on identifying timely and appropriate resolutions to the issues raised. Customers and/or their representative will be given the opportunity to outline the reasons for their complaint, the impact it has and the outcome they are seeking to resolve it.

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	Complaints Policy Updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail the way complaints were received to monitor which methods are used.	A variety of methods are available for customers to complain which are easy to use and accessible. They include, over the telephone, face to face, in writing, email and via our website which includes an online form. Hard copies of our complaint form can be downloaded from our website or posted on request.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Policy Updated April 2024. When relevant, any training material used with colleagues and dates training is provided will be reported in the monthly complaint report.	Staff are trained to discuss matters with customers and to distinguish between a service requests and dissatisfaction about the service they have received and offering the complaints process to customers who express concerns or dissatisfaction with our service.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaints Policy Updated April 2024 Documentation from the regular meetings held with service areas to track complaint themes, learnings and improvement actions.	We are committed to delivering a positive complaints culture where complaints are viewed as opportunities to learn and improve the quality of our services. We will use the learning from complaints to drive service improvements and publish the learnings identified and highlight where improvements have been made.

3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaint Policy Updated 2024 and PHG website	The policy will be published on our website and provided in a different formats if needed. The policy outlines our two-stage process.
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	Complaint Policy updated April 2024	The Complaints Policy is promoted via our website, social media platforms and customer newsletters. The Complaints Policy, <u>our complaints</u> leaflet, website and template letters used throughout the complaints process <u>include</u> information about HOS and their contact details.
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	Complaint Policy updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail the number and nature of complaints where a customer had a representative	Customers can ask a representative or advocate of their own choice to act on their behalf. Permission will need to be given from the customer to disclose information to their advocate in compliance with data protection requirements before proceeding.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaint Policy updated April 2024	The Complaints Policy, our complaints leaflet, website and template letters used throughout the complaints process include information about HOS and their contact details.

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	Complaints Policy Updated April 2024 Customer Resolution Team structure chart and job descriptions	The Customer Resolution Team (CRT) are dedicated to investigating and responding to complaints and are independent of the service area being complained about.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints Policy Updated April 2024	The CRT have access to staff at all levels to ensure complaints are resolved quickly and offer remedies that are in line with our Remedies and Compensation policy.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaints Policy Updated April 2024 When relevant, any training material used with colleagues and dates training is provided will be reported in the monthly complaint report.	We are committed to delivering a transparent, accessible and objective complaint process with the aims of being fair; putting things right and learning from outcomes. The CRT who are solely dedicated to managing the complaint process are trained in effective complaint handling, they investigate and respond to complaints, working in collaboration with Team Leaders, Managers, Heads of Service and Directors to make and influence decisions and have the support of staff at all levels to facilitate quick resolution of complaints.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy Updated April 2024	Just one complaint policy exists, and customers will not be treated differently should they complain.
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	Complaint Policy Updated April 2024	The policy has just two stages.
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	Complaint Policy Updated April 2024	The policy has just two stages.
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	Complaint Policy Updated April 2024	Our complaints process is managed by a dedicated in-house team.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint Policy Updated April 2024	Our complaints process is managed by a dedicated in-house team.
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	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions	Shortly after a complaint is logged at either stage, the CRT will contact the customer to ensure we fully understand the reasons for the complaint and outcome being sought. The complaint definition will be included in the written

			(CR) Manager will check this has been included	response. Where we are unable to contact the customer to understand scope and desired outcome the complaint investigation will continue based on the information available to the Customer Resolutions Officer.
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	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The complaint acknowledgement letter outlines the scope of the complaint and what aspects we are responsible for. Any aspects we are responsible for will also be discussed during the day 2 call back and clarified in the complaint response.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The Customer Resolutions Team are trained in effective complaint handling. The investigating officer will have no previous involvement in the case and will conduct an independent, unbiased investigation. Customers are given opportunities to clearly outline their complaint at various stages- from initial request, during day 2 call back and at any point during the complaint. If there is any conflict of interest, the complaint will be re-allocated to a different, independent complaint investigator.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code,	Yes	Complaint Policy Updated April 2024	If for any reason the complaint cannot be responded to within timescales the

	the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	customer will be informed of this and timescales for updating the customer will be agreed.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	Reasonable adjustments in accordance with the Equality Act 2010 will be made where appropriate and recorded on our systems and reviewed accordingly.
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	Complaint Policy Updated April 2024 and template letter The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	Complaints will not be refused unless there is a valid reason. The customer will receive written communication outlining the reason for refusal and will be provided information for the Housing Ombudsman Service.
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	Yes	System generated reports and correspondence records on our system	All complaints are recoded on our system which captures the stage, dates logged and resolved correspondence relating to the complaint, outcome, actions and learnings.

	parties, and any relevant supporting documentation such as reports or surveys.			
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	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The Customer Resolutions Team will work with the customer to identify and agree on a desired outcome/ remedy and will work towards this regardless of the complaint 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 putting any restrictions in place and must keep restrictions under regular review.	Yes	Unacceptable Behaviour Policy Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail the number and nature of any customers being managed through the policy, including dates, review dates, and any EA considerations.	The Unacceptable Behaviour Policy outlines how this type of behaviour will be addressed. This also includes review periods.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act (EA) 2010.	Yes		The Unacceptable Behaviour Policy takes the Equality Act 2021 into consideration.

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	Yes	Complaint Policy Updated April 2024	The Customer Resolutions Team reviews all complaints and if matters can be resolved quickly, they will do this. Further steps are included in our

	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.		Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will include % complaints responded in target	responses and complaints are issued as soon as the answer is known and not delayed until all of the actions have been completed.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaint Policy Updated April 2024	All complaints will be logged within 5 working days of being received,
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaint Policy Updated April 2024	All stage one complaints will be responded to within 10 working days.
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	Complaint Policy Updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail any complaints which were extended and why	The Customer Resolution Manager will authorise any extension request and these will not exceed 10 working days. This will be communicated to the customer and timescales for updating the customer will be agreed.
6.5	When an organisation informs a resident about an extension to these timescales,	Yes	Complaint Policy Updated April 2024	Letter templates include the Housing Ombudsman details.

	they must be provided with the contact details of the Ombudsman.		The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	
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	Complaint Policy Updated April 2024 and letter templates The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The Customer Resolution Team review all complaints and if matters can be resolved quickly, they will do this. Any further actions are included in our responses and complaints are issued as soon as the answer is known and not delayed until all the actions have been completed. All responses detail any outstanding actions and details on who will be over-seeing them along with a timeframe, if possible. All actions are recorded and monitored to completion by the Customer Resolution Team and service area managers.
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		The Customer Resolutions Team are trained on effective complaint handling which includes what aspects to consider when investigating and responding to complaints. Where applicable reference will be made to relevant policies, laws and good practice.
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	Yes		Where customers raise additional complaints during an ongoing investigation and the response has not yet been issued, these additional matters will be incorporated into the existing complaint. Where the response has been issued and the new issues are unrelated to the issues already being investigated or would unreasonably delay

	unreasonably delay the response, the new issues must be logged as a new complaint.			the response, the new issue will be logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes		Letter templates are in place to support staff and include details of the complaint stage, complaint scope, outcome with an explanation, any remedies to put things right and follow on actions where appropriate. Details of how to escalate to stage two of the complaints process if the customer remains dissatisfied are included. The complaints policy also includes what will be included in a stage one complaint response.

Stage 2

Code provision	Code requirement	Comply: Yes	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaint Policy Updated April 2024	If all or part of the complaint is not resolved to the customer's satisfaction, the complaint will be escalated to stage 2, the final stage. The customer does not need to explain their reason for requesting a stage 2, we will make all efforts to understand why the customer remains unhappy.
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	Complaint Policy Updated April 2024 The Quality	All complaints will be logged within 5 working days of being received,

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	Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The customer does not need to explain their reason for requesting a stage 2, we will make all efforts to understand why the customer remains unhappy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaint Policy Updated April 2024	The Customer Resolutions Manager or the Senior Customer Resolutions Manager investigate all stage two complaints with oversight from the Head of Customer Service.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint Policy Updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will include % complaints responded in target	Stage two responses will be issued within 20 working days.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaint Policy Updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience	The Head of Customer Service will authorise any extension requests to ensure they are in line with the Complaints Policy and Housing Ombudsman Code.

			Committee and Amalgamated Board will detail any complaints which were extended and why	
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	Complaint Policy Updated April 2024 and letter templates The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	Where extensions are authorised, the customer will be informed of this in writing and will be provided the Housing Ombudsman contact details.
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	Complaint Policy Updated April 2024 and letter templates The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The Customer Resolutions Manager and/or the Senior Customer Resolutions Officer will issue a response as soon the answer is known and not when outstanding actions are completed. Further steps are included in our responses. All responses detail any outstanding actions and details on who will be over-seeing them along with a timeframe if possible. All actions are recorded and monitored to completion by the Customer Resolution Team and service area managers.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the	Yes	The Customer Resolutions (CR) Manager will check this has been included	The Customer Resolutions Team are trained on effective complaint handling which includes what aspects to consider when investigating and

	relevant policy, law and good practice where appropriate.			responding to complaints. Where applicable reference will be made to relevant policies, laws and good practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes		Letter templates are in place to support staff and include details of the complaint stage, complaint scope, outcome with an explanation, any remedies to put things right and follow on actions where appropriate. Details of how to escalate to the Housing Ombuds if the customer remains dissatisfied are included.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaint Policy Updated April 2024	We have a two stage complaints process. All complaints are investigated and respond to working in collaboration with Team Leaders, Managers, Heads of Service and Directors to make and influence decisions and have the support of staff at all levels to facilitate quick resolution of complaints.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check this has been included	The Customer Resolutions Team is trained on effective complaint handling, which includes acknowledging when things have gone wrong, we will put these right and will outline the actions we have taken or intend to take in our responses.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Remedies and Compensation Policy	The Remedies and Compensation Policy is in place and sets out the circumstances when redress will be offered and the values that will be considered. This does account for the impact on the resident.
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	Complaint Policy Updated April 2024 The Quality Assurance Framework (QAF) where a sample of complaints are reviewed monthly by the Customer Resolutions (CR) Manager will check	Complaint responses outlined the remedy offered. All actions are tracked by the Customer Resolution Team to resolution.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		The Remedies and Compensation Policy is written in line with the Ombudsman guidance.

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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c) any findings of non-compliance with this Code by the Ombudsman; d) the service improvements made as a result of the learning from complaints; e) any annual report about the landlord's performance from the Ombudsman; and f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Remedies and Compensation Policy and self-assessment Annual Complaint Report	Annual complaints performance and service reports are produced for scrutiny. This includes the annual self-assessment against the Code (also published on our website). A qualitative and quantitative analysis into complaint volumes, performance, themes and trends, HOS cases and determinations, refused complaints are also produced and scrutinised.
8.2	The annual complaints performance and		Annual Complaint	Annual complaints performance and service

	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.		Report and Board response will be published on website and proactively communicated to customers through newsletters.	improvement report will be submitted to Executive Board and Amalgamated Board from approval before being published on the website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Self-assessment	A self-assessment will be completed following a significant event.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Self-assessment	A review and update of the self-assessment will be completed as per the instructions of the Ombudsman.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.	Yes	Business Continuity Plan to be updated to include notifying the HOS if a significant incident occurs	The Ombudsman will be informed in the event we are unable to comply with the Code. This information will also be shared with affected customers and published on our website and will include timescales.

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	Complaint Policy Updated April 2024	Each complaint is assessed and consideration is given to wider service improvements and learnings.
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	Documentation from the regular meetings held with service areas to track complaint themes, learnings and improvement actions.	Regular complaint learning meetings are held with service area managers to review themes, learnings and service improvement opportunities. These are tracked and will be included in the regular reporting provided to the MRC and governing bodies.
9.3	Accountability and transparency are also	Yes	Monthly complaint report issued to the	Complaint themes and learnings will be

	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.		Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will detail learning from complaints, as will the annual complaints report	included in regular reporting to all stakeholders. Improvements implemented as a result of complaints are included in our customer newsletter
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	Executive Director- Customer job description	The Executive Director- Customer has overall responsibility for the oversight of the application of the complaints policy. Regular reporting will ensure oversight of themes and learnings. Serious risks will be highlighted via the complex case review structure in place. Regular review of HOS determinations will also be reported via the Executive Board and other committees.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Complaint Policy Updated April 2024 Minutes of CEC meeting	The Committee Chair of the Customer Experience Committee (CEC) (a member of the Amalgamated Board) is appointed as having lead responsibility for complaints oversight.
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	Complaint Policy Updated April 2024 MRC will receive regular complaint performance reporting through CEC & Board. The Executive Director Customer & MRC will	The Committee Chair of the Customer Experience Committee (a member of the Amalgamated Board) is appointed as having leads responsibility for complaints oversight. They have access to all the necessary information and staff to perform this role.

			discuss the complaints report prior to CEC meetings and record any discussion or action points.	
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	Complaint Policy Updated April 2024 Monthly complaint report issued to the Executive Board and quarterly report to the Customer Experience Committee and Amalgamated Board will include this.	The Committee Chair of the Customer Experience Committee (a member of the Amalgamated Board) will receive regular reporting of complaint volumes, outcomes and complaint performance, trends and outcomes. They will also receive updates in HOS investigations as well as the annual performance report.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c) act within the professional standards for engaging with complaints as set by any relevant	Yes	Complaint Policy Updated April 2024 Customer Resolution Team and other relevant colleague job descriptions	We are committed to delivering a positive complaints culture where complaints are viewed as opportunities to learn and improve the quality of our services. Complaints are investigated in collaboration with Team Leaders, Managers, Heads of Service and Directors to make and influence decisions and have the support of staff at all levels to facilitate quick resolution of complaints. We work in collaboration to identify learnings and drive service improvements identified through complaints in accordance with professional standards set by relevant professional bodies.

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