



# HONEYCOMB GROUP

## Honeycomb Group Self-Assessment Form 2024-25

This self-assessment form has been completed by the complaints officer; it was submitted to the Housing Ombudsman in June 2024.

This document is published on our website along with our Annual Complaints Report for 2023-24, this will include the formal response from our board.

### **Important Links:**

- Our Complaints Policy: [complaints-policy.pdf \(honeycombgroup.org.uk\)](https://www.honeycombgroup.org.uk/complaints-policy.pdf)
- Our Customer Complaints Leaflet: [Complaints, compliments, and feedback \(honeycombgroup.org.uk\)](https://www.honeycombgroup.org.uk/complaints-compliments-and-feedback)
- Our Complaints page on our website: [Make a complaint, compliment, or share your feedback | Honeycomb \(honeycombgroup.org.uk\)](https://www.honeycombgroup.org.uk/make-a-complaint-compliment-or-share-your-feedback)
- Discretionary Compensation Policy: [discretionary-compensation-policy.pdf \(honeycombgroup.org.uk\)](https://www.honeycombgroup.org.uk/discretionary-compensation-policy.pdf)
- Unacceptable Behaviour Policy: [unacceptable-behaviour-policy-v5.pdf \(honeycombgroup.org.uk\)](https://www.honeycombgroup.org.uk/unacceptable-behaviour-policy-v5.pdf)
- Vulnerability and Reasonable Adjustments Policy: <https://www.honeycombgroup.org.uk/media/5010/reasonable-adjustments-policy.pdf>

## Section 1: Definition of a complaint

1.1: Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint.

Code provision	Code requirement	Comply : Y / N	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	<b>Complaints Policy.</b> see: 2.1	This is included in our mandatory Complaints training for ALL colleagues.
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	<b>Complaints Policy.</b> see: 2.2	This is included in our mandatory Complaints training for ALL colleagues.
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	<b>Complaints Policy.</b> see: 2.3	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for handling service requests will be provided with more detailed training and will use process maps to follow to categorise customers comments.  We log all service requests, as we would complaints, and monitor and analyse the themes and trends to improve service delivery.
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	<b>Complaints Policy.</b> see: 2.4  <b>Complaints Page on Website.</b>	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for handling service requests will be given more detailed training around this.  The customer feedback and complaints page on our website explains how we will log complaints.
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	<b>Complaints Policy.</b> see: 2.5  <b>Complaints Page on Website.</b>	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for managing handling satisfaction responses will be given more detailed training around this.  The customer feedback and complaints page on our website explains how that when a customer is unhappy with the outcome of a service request they will have the opportunity to raise a complaint.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Y / N	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	<b>Complaints Policy.</b> see: 3.1, 3.2, 3.3	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for logging complaints will be given more detailed training around this.  We record all refused complaints on our housing management system and this data will be included within our complaints reporting.
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: <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> <li>Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<b>Complaints Policy.</b> see: 3.1, 3.2, 3.3	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for logging complaints will be given more detailed training around this.  The Customer Voice Specialist will work collaboratively with colleagues across the business when a complaint overlaps with any legal procedures have started.
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	<b>Complaints Policy.</b> see: 3.1, 3.2, 3.3	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for logging complaints will be given more detailed training around this.  The Customer Voice Specialist will work collaboratively with colleagues across the business to determine if we should accept complaints received after 12 months of the issue occurring.

2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<b>Complaints Policy.</b> see: 3.1, 3.2, 3.3  <b>Complaints Page on Website.</b>	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for logging complaints will be given more detailed training around this.  All refusal letters will include information on a customer's right to appeal the decision and how to contact the Housing Ombudsman.  The customer feedback and complaints page on our website explains that if we decide not to accept a complaint, we will write to the customer within 5 working days explaining why we will not be investigating and how to challenge our decision.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<b>Complaints Policy.</b> see: 3.1, 3.2, 3.3	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for logging complaints will be given more detailed training around this.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Y / N	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	<b>Complaints Policy.</b> see: 5.1  <b>Complaints Page on Website.</b>  <b>Customer Complaints Leaflet.</b>	This is included in our mandatory complaints training for ALL colleagues.  The customer feedback and complaints page on our website provides full contact details and instructions on how to access our complaints process. It also includes a quick access web form that is sent directly to the complaints team for review.  Our customer complaints leaflet includes full contact details and instructions on how to access our 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	<b>Complaints Policy.</b> see: 5.1	This is included in our mandatory Complaints training for ALL colleagues.  ALL colleagues are actively appraised against targets for customer engagement and complaints.

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p><b>Complaints Policy.</b> see: 1.5, 15, 16</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>We actively encourage feedback from our customers and are working hard to foster a positive complaints culture. We will be launching a new Customer Voice Strategy in Summer 2024, this will be led by our Customer Voice Specialist, who also acts as our Complaints Officer.</p> <p>The customer feedback and complaints page on our website provides a brief overview of our approach to complaints, this page aims to actively encourage feedback.</p> <p>Our customer complaints leaflet provides a brief overview of our approach to complaints, this leaflet aims to actively encourage feedback.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p><b>Complaints Policy.</b> see: 12.1</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Our Complaints Policy and Procedure and customer leaflet are available on our website, printed copies will be provided to the customer on request. Our complaints leaflet will also be available in our hubs and in our communities.</p> <p>A copy of the complaints policy and procedure will be provided to all customers who log a stage 1 complaint with us.</p> <p>The customer feedback and complaints page on our website provides a brief overview of our approach to complaints, linking to relevance guidance around the processes.</p> <p>The customer complaints leaflet provides a simplified overview of our complaints process.</p>

3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p><b>Complaints Policy.</b> see: 12.1</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>We include a copy of or complaints policy and procedure with every complaint acknowledgement letter, this letter also includes details on how to escalate or seek guidance and advice from the Housing Ombudsman.</p> <p>We have a dedicated page to customer feedback and complaints on our website, this page includes links to all complaints documents, and it also includes the contact details for the Housing Ombudsman.</p> <p>The customer complaints leaflet provides a simplified overview of our complaints process, it will be available to download from our website, a PDF and printed copies be provided on request. Printed copies will be available in our hubs and communities.</p> <p>We recently launched our new complaints policy and related documents; this will be published in our customer newsletter in Summer 2024</p>
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	<p><b>Complaints Policy.</b> see: 4.2</p> <p><b>Complaints Page on Website.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>We have methods for recording representatives and advocates on our housing management system. If a complaint is received from someone other than the customer or their nominated account representatives, we will seek to gain permission to proceed with the customer. We will seek to balance the need for sensitivity for vulnerable individuals with GDPR compliance.</p> <p>The customer feedback and complaints page on our website explains that we will accept complaints from advocates on behalf of a customer but we may need to contact the customer for permission.</p>

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	<p><b>Complaints Policy.</b> see: 1.7, 1.8, 3.2, 7.3, 8.4, 8.6, 8.7, 8.8, 8.9, 12.1, 16.2</p> <p><b>Complaints Page on Website.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>All letters sent to the customer regarding their complaint will include information on how to escalate or seek guidance and advice from the Housing Ombudsman. This information will also be provided on request.</p> <p>The customer feedback and complaints page on our website includes information on how to escalate or seek guidance and advice from the Housing Ombudsman.</p> <p>The customer complaints leaflet provides contact details for the Housing Ombudsman. It will be available to download from our website, a pdf copy can be provided via email by request, a printed copy can be provided on request, printed copies will be available in our hubs and communities.</p>
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#### Section 4: Complaint Handling Staff Section

Code provision	Code requirement	Comply: Y / N	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><b>Complaints Policy.</b> see: 15.1</p>	<p>The complaints team are responsible for coordinate, monitor and analyse complaints ensuring effective and compliant complaints handling, this team consists of:</p> <ul style="list-style-type: none"> <li>• Customer Voice Specialist (acts as the Complaints Officer).</li> <li>• Complaints Advisor</li> <li>• Complaints Handlers</li> </ul>
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><b>Complaint Policy.</b> see: 1.10</p> <p><b>Discretionary Compensation Policy.</b></p>	<p>The Customer Voice Specialist reports directly to the Director of Operation to ensure prompt resolution to complaints and for approval of financial remedies in line with our Discretionary Compensation Policy.</p> <p>The Customer Voice Specialist has access to and is adequately trained on exporting data from all systems.</p>

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<b>Complaint Policy.</b> see: 1.5, 1.6, 1.10, 15.1, 15.3. 15.4	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this.
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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Y / N	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	<b>Complaints Policy.</b>  <b>Complaints Page on Website.</b>  <b>D</b>	We have one Complaints Policy, this policy is underpinned by one Complaints Procedure.  Supporting this policy we have several related policies including; <ul style="list-style-type: none"> <li>• Discretionary Compensation Policy,</li> <li>• Unacceptable Behaviour Policy,</li> <li>• Vulnerability and Reasonable Adjustments Policy,</li> </ul> The customer feedback and complaints page on our website includes links to all the above policies.
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	<b>Complaints Policy</b> See: 2.2, 6.1  <b>Complaints Page on Website.</b>  <b>Customer Complaints Leaflet.</b>	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this.  The customer feedback and complaints page on our website includes an overview of our 2-stage complaint process.  The customer complaints leaflet includes an overview of our 2-stage complaint process.



5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<p><b>Complaints Policy</b> See: 2.2, 6.1</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The customer feedback and complaints page on our website includes an overview of our 2-stage complaint process.</p> <p>The customer complaints leaflet includes an overview of our 2-stage complaint process.</p>
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	<b>Complaints Page on Website.</b>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for contract management will be given more detailed training around this.</p> <p>All complaints are investigated through our internal complaints process, there are no third parties involved in our complaint process.</p> <p>If a customer expresses dissatisfaction to a contractor, they are responsible for relaying this information to Honeycomb. All contractors are advised of our complaints handling process and are encouraged to share feedback from customers with us, this is picked up as part of the procurement and contract management piece.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<b>Complaints Page on Website.</b>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for contract management will be given more detailed training around this.</p> <p>All complaints are investigated through our internal complaints process, there are no third parties involved in our complaint process.</p> <p>If a customer expresses dissatisfaction to a contractor, they are responsible for relaying this information to Honeycomb. All contractors are advised of our complaints handling process and are encouraged to share feedback from customers with us, this is picked up as part of the procurement and contract management piece.</p>

5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<b>Complaints Policy</b> See: 7.1	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this. They will also be provided with templates to work from, and all complaint letters will be signed off by the Complaints Team.  Wherever possible, complaint handlers are expected to contact the customer or advocate within the first 5 days to discuss the complaint in more detail, this call is to ensure the handler is completely clear on the customer's issue.
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	<b>Complaints Policy</b> See: 7.1, 8.4	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this. They will also be provided with templates to work from, and all complaint letters will be signed off by the Complaints Team.
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	<b>Complaints Policy</b> See: 6.2	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this. They will also be provided with templates to work from, and all complaint letters will be signed off by the Complaints Team.  The new complaint policy and procedure has been designed to increase direct contact with the customer, the procedure now requires that wherever possible each customer receives at least two calls from their complaint handler. The first call will be used to understand the complaint in more detail and where possible seek an early resolution. The second call will be used to discuss the investigation outcome and where possible agree an acceptable resolution.

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<b>Complaints Policy</b> see: 7.2, 7.3, 8.4, 8.7	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this. They will also be provided with templates to work from, and all complaint letters will be signed off by the Complaints Team.</p> <p>The new procedure requires that all extensions are confirmed with the customer in writing, each letter will include the reason for the extension, the new deadline and when the customer can expect to hear from us again.</p>
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	<b>Complaints Policy</b> See: 11.2, 13.1  <b>Vulnerability and Reasonable Adjustments Policy</b>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>We have methods for recording vulnerabilities on our housing management system. If a complaint is received from someone with a recorded vulnerability colleagues are expected to consider this when contact the customer, investigating the complaint and agreeing an acceptable resolution.</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	<b>Complaints Policy</b> See: 3.1, 3.2, 3.3, 8.1, 8.8	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p>

5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	<b>Complaint Policy</b> See: 1.3, 14.1	<p>This is included in our mandatory Complaints training for ALL colleagues. All colleagues are expected to log s note if a customer speaks to them about their complaint, even if they are not the complaint handler.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>We have methods for recording case notes against all complaint cases, the complaint handler is responsible to ensure all written and verbal communication with the customer about their complaint is stored against the case file, the complaint handler must also ensure that a copy of any other relevant documents used as part of the complaint investigation such as surveys, inspections, emails from other colleagues are stored against the case file.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any documents referred to or missing back to the case handler for inclusion.</p>
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	<b>Complaints Policy</b> See: 6.3	<p>This is included in our mandatory Complaints training for ALL colleagues. All colleagues are expected to log s note if a customer speaks to them about their complaint, even if they are not the complaint handler.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this. Stage 1 complaint handlers are encouraged to consider all reasonable remedies with the customer.</p> <p>If a complaint handler wishes to offer a customer financial compensation as part of the complaint remedy, they are encouraged to submit a request to the Director of Operations for approval, in-line with our Discretionary Compensation Policy, approval must be sought before any offer is made to a customer.</p>

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	<p><b>Complaints Policy</b> See: 11.1</p> <p><b>Unacceptable Behaviour Policy</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>All colleagues are expected to protect themselves and colleagues against unacceptable behaviour, any escalating behaviour should be logged against the complaint case.</p> <p>Following an incident of 'unacceptable behaviour', the 'Customer Voice Specialist' who will convene and emergency 'Unacceptable Behaviour Panel' meeting to discuss next steps.</p> <p>If a complaint is received from a customer who is already on restricted access, the complaint handler will work with the designated contact for the customer to ensure all conversations are through the agreed channels.</p> <p>When appropriate Honeycomb will take action against a customer if it deems it is the best interest of our colleagues. This may mean we escalate significant issues to our local police force or social services.</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	<p><b>Complaints Policy</b> See: 11.2</p> <p><b>Unacceptable Behaviour Policy</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The 'Unacceptable Behaviour Panel' will review any restrictions on contact and ensure they show regard for provisions of the Equality Act.</p>

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Y / N	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	<b>Complaints Policy</b> See: 1.4, 7.1, 7.4	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The new complaint policy and procedure has been designed to increase direct contact with the customer, the procedure now requires that wherever possible each customer receives at least two calls from their complaint handler at stage 1. The first call will be used to understand the complaint in more detail and where possible seek an early resolution. The second call will be used to discuss the investigation outcome and where possible agree an acceptable resolution.</p>
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	<b>Complaints Policy</b> See: 7.1	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for reviewing and responding to any expression of dissatisfaction within the first 5-working days. If a complaint is accepted the complaint team will ensure to send a formal acknowledgement letter.</p>
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	<b>Complaints Policy</b> See: 7.1	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for monitoring all complaints and checking they are progressing in-line with the complaints policy. If applicable, issues will be escalated through the team up to the Operations Director.</p>

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	<b>Complaints Policy</b> See: 7.2, 7.3, 7.4	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>Wherever possible Complaint Handlers are asked to respond to a complaint within 10-working days, if an extension is required colleagues are asked to apply this as soon as reasonably possible and preferably within the first 5 days.</p> <p>Any extension of up to 10-working days will be confirmed to the customer in writing.</p> <p>Any Complaint Handler who believes they need an extension beyond 10-working days will speak to the Customer Voice Specialist for further advice.</p> <p>The complaints team are responsible for monitoring all complaints and checking they are progressing in-line with the complaints policy. If applicable, issues will be escalated through the team up to the Operations Director.</p>
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<b>Complaints Policy</b> See: 7.3	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>All letters regarding an extension will include the contact details for the Housing Ombudsman.</p>
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	<b>Complaints Policy</b> See: 7.1	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<b>Complaints Policy</b> See: 7.1	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<b>Complaints Policy</b> See: 7.4	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <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	<b>Complaints Policy</b> See: 7.1	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>



Stage 2

Code provision	Code requirement	Comply: Y / N	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	<p><b>Complaints Policy</b> See: 8.1</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The final response letter will explain that the customer has reached the end of the complaints process and provide information on contacting the Housing Ombudsman for further guidance and advice.</p> <p>The customer feedback and complaints page on our website explains that we have a two-stage complaint process and if a customer is unsatisfied with a stage 2 response they should contact the Housing Ombudsman to discuss their options.</p> <p>The customer complaints leaflet that we have a two-stage complaint process and if a customer is unsatisfied with a stage 2 response they should contact the Housing Ombudsman to discuss their options.</p>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	<p><b>Complaints Policy</b> See: 8.4</p>	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for reviewing and responding to any escalation request within the first 5-working days. If an escalation is accepted the complaint team will ensure to send a formal acknowledgement letter.</p>
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	<p><b>Complaints Policy</b> See: 8.3</p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>We do not expect a customer to explain their reason for wanting to escalate their complaint to stage 2.</p>

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<b>Complaints Policy</b> See: 8.2	Colleagues responsible for complaint logging and handling will be given more detailed training around this.  All stage 2 escalation are assigned by the complaints team to ensure they are allocated in accordance with the complaints policy.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	Yes	<b>Complaints Policy</b> See: 8.4	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this.  The complaints team are responsible for monitoring all complaints and checking they are progressing in-line with the complaints policy. If applicable, issues will be escalated through the team up to the Operations Director.
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	<b>Complaints Policy</b> See: 8.7	Colleagues responsible for complaint logging and handling will be given more detailed training around this.  Wherever possible Complaint Handlers are asked to respond to a complaint within 20-working days, if an extension is required colleagues are asked to apply this as soon as reasonably possible and preferably within the first 5 days.  Any extension of up to 20-working days will be confirmed to the customer in writing.  Any Complaint Handler who believes they need an extension beyond 20-working days will speak to the Customer Voice Specialist for further advice.  The complaints team are responsible for monitoring all complaints and checking they are progressing in-line with the complaints policy. If applicable, issues will be escalated through the team up to the Operations Director.
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	<b>Complaints Policy</b> See: 8.8	Colleagues responsible for complaint logging and handling will be given more detailed training around this.  All letters regarding an extension will include the contact details for the Housing Ombudsman.

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<b>Complaints Policy</b> See: 8.4	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<b>Complaints Policy</b> See: 8.4	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <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	<b>Complaints Policy</b> See: 8.4	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<b>Complaints Policy</b> See: 15.1	<p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The Customer Voice Specialist will work closely with all case handlers with an active stage 2 complaint, providing direct access to the Director of Operations as required.</p>

## Section 7: Putting things right

Code provision	Code requirement	Comply: Y / N	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><b>Complaints Policy</b> See: 8.5 &amp; 8.6</p> <p><b>Discretionary Compensation Policy.</b></p>	<p>Colleagues responsible for complaint handling will be given more detailed training around this.</p> <p>All complaint handlers are encouraged to consider all reasonable remedies with the customer.</p> <p>If a complaint handler wishes to offer a customer financial compensation as part of the complaint remedy, they are encouraged to submit a request to the Director of Operations for approval, in-line with our Discretionary Compensation Policy, approval must be sought before any offer is made to a customer.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p><b>Complaints Policy</b> See: 8.5, 8.6, 10.1</p> <p><b>Discretionary Compensation Policy.</b></p>	<p>Colleagues responsible for complaint handling will be given more detailed training around this.</p> <p>All complaint handlers are encouraged to consider all reasonable remedies with the customer.</p> <p>If a complaint handler wishes to offer a customer financial compensation as part of the complaint remedy, they are encouraged to submit a request to the Director of Operations for approval, in-line with our Discretionary Compensation Policy, approval must be sought before any offer is made to a customer.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p><b>Complaints Policy</b> See: 8.4, 8.5, 8.6</p>	<p>Colleagues responsible for complaint handling will be given more detailed training around this.</p> <p>The complaints team are responsible for approving all complaint response letters before sharing with the customer.</p> <p>The Customer Voice Specialist will complete an internal audit function and randomly audit complaint investigations, highlighting any issues with resolution content.</p>

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<b>Complaints Policy</b> See: 8.6  <b>Discretionary Compensation Policy.</b>	Colleagues responsible for complaint handling will be given more detailed training around this.  We use the Housing Ombudsman remedy guidance and have produced a staff communication about this.
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## Section 8: Putting things right

Code provision	Code requirement	Comply: Y / N	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <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	<b>Complaints Policy</b> See: 1.9	The 'Customer Voice Specialist' will produce the annual complaints report each financial year, this will be submitted to the Housing Ombudsman each year, alongside the annual self-assessment and governing body statement.  The Customer Voice Specialist has attended training delivered by the housing Ombudsman on how to submit this.
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. <b>The governing body's response to the report must be published alongside this.</b>	Yes	<b>Complaints Policy</b> See: 1.9, 15.4  <b>Complaints Page on Website.</b>	The annual complaints report, self-assessment against the code and the governing body statement will be published on our website

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<b>Complaints Policy</b> See: 17.1	Our senior management team are aware of the need for a new self-assessment in the event of a significant restructure or merger.  The Customer Voice Specialist is responsible for re-assessment on the back of a significant change in procedure.  The Customer Voice Specialist has attended training delivered by the housing Ombudsman on how to submit this.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<b>Complaints Policy</b> See Section 17.1	Our senior management team are aware of the potential need for a new self-assessment following an Ombudsman investigation.  The Customer Voice Specialist is responsible for reviewing all judgements following an Ombudsman investigation.
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	<b>Complaints Policy</b> See: 16.2	Our senior management team are aware of the need to report exceptional circumstances that render us unable to comply with the code.  The Customer Voice Specialist is responsible for liaising with the Housing Ombudsman about such matters.

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Y / N	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	<b>Complaints Policy</b> See: 15.3, 15.4	This is included in our mandatory Complaints training for ALL colleagues.  Colleagues responsible for complaint logging and handling will be given more detailed training around this.  The Customer Voice Specialist is responsible for ensuring adequate reporting on complaints. A monthly report will be provided to Heads of Service, Directors, and The Nominated Member for Complaints. A quarterly report will be shared with the Customer Services Committee and Board. All reports will detail 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	<p><b>Complaints Policy</b> See: 1.5, 1.6, 15, 16</p> <p><b>Complaints Page on Website.</b></p> <p><b>Customer Complaints Leaflet.</b></p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>The customer feedback and complaints page on our website provides a brief overview of our approach to complaints, this page aims to actively encourage feedback. On this page there is also a section called “You Said, We Did”, this section will be used to promote positive changes introduced on the back of customer engagement and complaints.</p> <p>Our customer complaints leaflet provides a brief overview of our approach to complaints, this leaflet aims to actively encourage feedback.</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider website improvements from complaints to stakeholders, such as residents’ panels, staff and relevant committees.	Yes	<p><b>Complaints Policy</b> See: 15</p>	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>Colleagues responsible for complaint logging and handling will be given more detailed training around this.</p> <p>We are keen to promote our learnings and service improvements from complaints on the back on complaints and other feedback. We will feature our learnings on our website and within our customer newsletter. Where appropriate it will raised within our customer engagement activities.</p> <p>The Customer Voice Specialist is responsible for ensuring adequate reporting on complaints. A monthly report will be provided to Heads of Service, Directors, and our Member Responsible for Complaints. A quarterly report will be shared with the Customer Services Committee and Board. All reports will detail learnings.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<p><b>Complaints Policy</b> See: 15.1</p>	<p>We have appointed our Executive Director of Operations as our senior lead person for complaints handling. This role is responsible for signing off on all compensation payments and the Customer Voice Specialist (acting as the complaints officer) will also report into this person.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (‘the MRC’).	Yes	<p><b>Complaints Policy</b> See: 15.2</p>	<p>We have appointed a Member Responsible for Complaints, the Customer Voice Specialist will provide them with a monthly report on complaints, monthly meetings will be held to discuss key learnings and findings.</p>

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	<b>Complaints Policy</b> See: 15.2	<p>The Member Responsible for Complaints will be provided monthly reports by the Customer Voice Specialist, this report will be discussed in a follow up meeting.</p> <p>The Member Responsible for Complaints can request further information on any case, which will be provided by the Customer Voice Specialist.</p> <p>If themes are presented the Member Responsible for Complaints will request a meeting with the relevant team to discuss issues within the service area impacting on complaints.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> <li>1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>2. regular reviews of issues and trends arising from complaint handling;</li> <li>3. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>4. annual complaints performance and service improvement report.</li> </ol>	Yes	<b>Complaints Policy</b> See: 15.2	<p>The Member Responsible for Complaints will be provided monthly reports by the Customer Voice Specialist, this report will be discussed in a follow up meeting.</p> <p>The Member Responsible for Complaints can request further information on any case, which will be provided by the Customer Voice Specialist.</p> <p>If themes are presented the Member Responsible for Complaints will request a meeting with the relevant team to discuss issues within the service area impacting on complaints.</p> <p>The Customer Voice Specialist will ensure to regularly update the Member Responsible for Complaints on the outcome of any Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings and provide a copy of the annual complaints' performance and service improvement report.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ol 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> </ol>	Yes	<b>Complaints Policy</b> See: 1.5, 1.6, 1.10	<p>This is included in our mandatory Complaints training for ALL colleagues.</p> <p>From May 2024, ALL colleagues are actively appraised against our new target:</p> <p style="color: #e67e22;">“Works hard to build trusting relationships with customers, listens to understand customer's needs, committed to improving services and customer experience, takes responsibility for resolving customer issues, acts as an ambassador for the brand and Group”</p>