






# Housing Ombudsman Complaint Handling Code


## Self-assessment June 2024




## Section 1: Definition of a complaint


Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>		Complaints Policy, section 4, 'Ways we can put things right'.	Section 4.7: We have adopted this definition exactly in our 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.		Complaints Policy, as set-out in sections 3, 'Accessibility', and 4, 'Ways we can put things right'.	See sections 2.1, 2.2, and 4.1.
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.		Complaints Policy, section 4, 'Ways we can put things right'.	See section 4 for a clear definition between Service Requests and Complaints included.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.		Complaints Policy, section 4, 'Ways we can put things right'.	See section 4.6.
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.		Complaints Policy, section 4, 'Ways we can put things right'.	All residents providing negative feedback via satisfaction survey receive a call-back to discuss the dissatisfaction which is recoded as a Service Request as per Complaints Policy, section 4.4 to 4.6. The resident is advised of their options regarding our Complaints Policy.


## Section 2: Exclusions





Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits		Complaints Policy, section 3 'Exclusions'.	Section 3 outlines all grounds for excluding a resident from the Complaints Policy.



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2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>		Complaints Policy, section 3 'Exclusions'.	All decisions are confirmed in writing, including the grounds that have been used for exclusion where this is the case.
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.		Complaints Policy, section 3 'Exclusions'.	Section 3.5: Policy limit is 12 months. All complaints will be considered on their merits, and we allow for exceptional circumstances.
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		Complaints Policy, section 3 'Exclusions'.	All decisions are confirmed in writing, including the grounds that have been used for exclusion where this is the case.

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	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.			All formal correspondence includes information on how to contact the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Complaints Policy, section 3 'Exclusions'.	<p>All decisions are confirmed in writing, including the grounds that have been used for exclusion where this is the case.</p> <p>All formal correspondence includes information on how to contact the Housing Ombudsman.</p>


### 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.		Complaints Policy, section 2 – Accessibility and Reasonable Adjustments.	Our website confirms that Complaints can be received in writing, by email, by telephone, by Chat, by social media.

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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.		Arches Housing website 'Feedback and Complaints' page.	All relevant staff have been trained on how to identify complaints, how to log and action or refer onwards, and how to advise residents of their options and right to contact the Housing Ombudsman.
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.		Complaints Policy, section 2 'Accessibility'.	Section 2.3: Policy stance is that complaints are a positive sign that the service is accessible and is intended to help put things right.
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.		Complaints Policy, section 5 'How we deal with Complaints'.	Ours is a 2-stage process, which is set-out clearly in our Policy and on our website.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		Complaints Policy, section 11, 'Governance, Assurance and Reporting'.	Section 11.3 states: Monitoring of the delivery of this Policy will be the responsibility of the Board of Management via: <ul style="list-style-type: none"> <li>• Quarterly Complaints Report</li> <li>• Annual Key Performance Indicators (KPI)</li> <li>• Annual Performance and Service Improvement Report, including</li> </ul>





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				self-assessment against the Complaint Handling Code.
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.		Complaints Policy, Section 2, 'Accessibility'.	A Complaint submitted via a third-party representative such as a family member, MP or local counsellor or advice agencies/charities,[will be accepted] subject to necessary consents being provided for the sharing of personal information as per our Data Protection policy.
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.		Complaints Policy, Section 1, 'Policy Statement and Principles'.	Item 1.5.advises that our residents have the right to contact the Housing Ombudsman at any time for advice on complaints, and we advise all complainants of this right, and how to contact the Housing Ombudsman, on all complaint correspondence.





#### 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		Complaints Policy, section 6, 'The Complaints Officer'.	Sections 6 sets out the duties and responsibilities of the Complaints Officer, which is part of the role of the Corporate and HR Manager.




Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	officer'. This role may be in addition to other duties.			
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.	✓	Complaints Policy, section 6.	
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.	✓	Complaints Policy, section 1 Policy Statement and Principles, and section 11, Reporting and Governance.	<p>All relevant staff receive regular training on the importance and process for complaint handling.</p> <p>Learning from Complaints is managed via a dedicated officers group who routinely consider complaint themes and outcomes to identify learning opportunities and actions.</p> <p>Complaints performance and learning is reported to the Board via the Member Responsible for Complaints (MRC) on a quarterly and annual basis.</p> <p>Reporting to residents on learning from complaints is done via the website and in printed resident newsletters.</p>


## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.		Complaints Policy, section 2.4 'Accessibility'	'No resident will experience any detriment due to having made a Complaint. Complaints help us to resolve disputes together and are an important opportunity to build a positive relationship with our residents.'
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.		Complaints Policy, section 4, 'Ways we can put things right'.	Policy is comprised of 2 stages where a resident wishes for us to treat their dissatisfaction as a Complaint.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.		Complaints Policy, section 4, 'Ways we can put things right'.	As above.
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.		Complaints Policy, section 7, 'Working with Contractors and Third Parties'.	Where dissatisfaction that is recognised to be a Complaint is made to any contractor or third party, that concerns a service that they have provided on behalf of Arches Housing, they will refer this to us so that we can investigate this impartially and in-line with this Policy.

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5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		Complaints Policy, section 7, 'Working with Contractors and Third Parties'.	Section 7.2 states: Where dissatisfaction that is recognised to be a Complaint is made to any contractor or third party, that concerns a service that they have provided on behalf of Arches Housing, they will refer this to us so that we can investigate this impartially and in-line with this Policy.
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.		Complaints Policy, section 5, 'How we Deal with Complaints'.	Section 5.2 states: We will include our understanding of the complaint and the outcome that the resident is seeking, name of the investigating officer, how long to allow for the investigation to be completed, and how to contact the Housing Ombudsman.
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.		Complaints Policy, section 3, 'Exclusions', & section 5, 'How we Deal with Complaints'.	Section 3.8 and Section 5.2.
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.		Complaints Policy sections 5, 'How we Deal with Complaints', and 6, 'The Complaints Officer'.	Policy confirms that: investigation outcomes and letters are quality assured by the Complaints Officer (6.2)  Investigators must be impartial (5.3).




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	<ul style="list-style-type: none"> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			In addition, complaint investigations are supported with a checklist for investigators which guides them to ensure the investigation is fair.
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.		Complaints Policy, section 5, 'How we deal with Complaints'.	Section 5.6 concerns extension at Stage 1, and 5.18 at Stage 2. Both remind the resident of their right to contact the Housing Ombudsman, in writing.
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.		Complaints Policy, section 2, 'Accessibility'.	Reasonable Adjustments (2.5) states: Arches Housing is committed to ensuring that residents with additional needs are not disadvantaged in accessing its services. To this end we will discuss with the resident whether there are additional needs regarding communication preferences and make reasonable adjustments where necessary to ensure accessibility for all residents.
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.		Complaints Policy, section 3 'Exclusions'.	Section 3.7 states: We may exclude a complaint from progressing to Stage 2 if it is deemed that no further redress can be provided, such as where a resident is expressing dissatisfaction with our policy where there are no discriminatory concerns. Where this is





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				the case, we will confirm this in our Stage 1 response letter.
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.		A full external audit was undertaken May 2024 which resulted in Significant Assurance being given on the design and effectiveness of Policy, process and systems, including record keeping for cases.	A case management process, part of the housing and asset management database, is used to compile all records associated with the complaint case. This includes communications, interviews, transcripts of calls, policy references, and letter outcomes. It is also used to ensure all steps required to manage a case are followed. Board acknowledge the outcome of the external audit in their response to the Annual Complaints Performance and Service Improvement Report Foreword.
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.		Complaints Policy, section 6 'The Complaints Officer'.	6.1 states: The Complaints Officer is an impartial role that does not investigate complaints but has access to staff at all levels to facilitate the prompt resolution of complaints, having the authority and autonomy to act to resolve disputes fairly and at the earliest point.
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		Reasonable Contact and Acceptable Behaviour Policy	A separate dedicated Policy concerning acceptable behaviour and contact from residents set out how such behaviour is defined, and how decisions on action taken are made and managed.



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	putting any restrictions in place and must keep restrictions under regular review.			
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.		Reasonable Contact and Acceptable Behaviour Policy.	A separate dedicated Policy concerning acceptable behaviour and contact from residents sets out how decisions should take account of avoiding discrimination.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.		Complaints Policy, section 4 'Ways we can put things right', and section 5 'How we deal with Complaints'.	Section 4.2 explains that we will agree with the resident who they wish for their dissatisfaction to be handled.  4.3 explains the circumstances in which a complaint may take longer to investigate, or where dissatisfaction is best treated as a complaint.
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>		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.2 states: Where a complaint or part of a complaint is accepted, we will acknowledge it within five working days. We will include our understanding of the complaint and the outcome that the resident is seeking, name of the investigating officer, how long to allow for the investigation to be completed, and how to contact the Housing Ombudsman.
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.		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.8 confirms that our target response time is 10 working days.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.8 also explains the circumstances in which a complaint investigation may need to or will exceed the target time of 10 working days, and that in such cases an extension will be for a further 10 days, with a maximum of 20 days overall.
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.		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.8 also states that: Where an extension is required, this will be confirmed in writing, together with advice on how to contact the Housing Ombudsman.
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.		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.7 states that complaints investigations seek to: ... determine whether a failing has occurred for which Arches is responsible.'  Responses set-out the findings, and note any actions agreed should a failing have been identified. The complaint can be escalated to stage 2 should the actions taken/repairs not resolve the issue.
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.		Complaints Policy, section 6 'The Complaints Officer'.	Standard templates are in place which ensure all points raised are addressed and responded to. The role of the Complaints Officer is to ensure all points have been




Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				addressed, and to refer back to the investigator if not. Decisions are based on whether a failing has occurred based on what our Policy (and the law) says we should do.
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.		Complaints Policy, section 6 'The Complaints Officer'.	The role of the complaints officer is to ensure the fair and objective handling of complaints. Where items are raised during the course of the investigation which are relevant, these will be included within the investigation. Our process includes early touchpoints which give the resident to express their complaint, and for us to confirm our understanding and confirm this in writing.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage.</li> <li>b. the complaint definition.</li> <li>c. the decision on the complaint.</li> <li>d. the reasons for any decisions made.</li> <li>e. the details of any remedy offered to put things right.</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>		Complaints Policy, section 6 'The Complaints Officer'.	Standard templates are in place which ensure all points raised are addressed and responded to.  Letter templates include: <ul style="list-style-type: none"> <li>• a reminder of the description of the complaint as agreed during the acknowledgement phase,</li> <li>• the residents desired outcome</li> <li>• A summary of the investigation findings on each point raised including whether we were at fault,</li> <li>• The overall outcome (upheld or not upheld),</li> </ul>


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				<ul style="list-style-type: none"> <li>• what we will do to put it right including any award of compensation or good will gesture,</li> <li>• what we will do to stop it happening again,</li> <li>• what to do if the resident remains unhappy and how to escalate to stage 2,</li> <li>• information on how to contact the housing ombudsman.</li> </ul>

## Stage 2


Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	✓	Complaints Policy section 5 'How we deal with Complaints'.	Section 5.11 states: If a customer is dissatisfied with the outcome of their complaints at Stage 1, they can choose to have their complaint reviewed again by a more senior member of staff at Stage 2.
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.	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.13 states Where a request for review is accepted, we will acknowledge it within five working days...
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.13 continued: This will include our understanding of the complaint, their reason for

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			requesting a review if this is known, and the outcome to their complaint that the resident was seeking. We will also include the name of the investigating officer, how long to allow for the investigation to be completed, and how to contact the Housing Ombudsman.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.14 states that: The complaint will be reviewed by the Director of Operations, or Chief Executive, subject to the nature of the complaint and service in question.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.16 states: We aim to complete investigations at Stage 2 within twenty working day.
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.	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.16 continued: Where a case is complex, or the resident is vulnerable or at risk and reasonable adjustments are in place which reflect the resident's capacity to engage with our timescales, we may need to extend this by a further twenty days.
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.	✓	Complaints Policy section 5 'How we deal with Complaints'.	5.16 continued: We will confirm this in writing, together with advice on how to contact 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.		Complaints Policy section 5 'How we deal with Complaints'.	Section 5.7 states that complaints investigations seek to: ... determine whether a failing has occurred for which Arches is responsible.' Letter templates also set-out the actions to be taken where a complaint is upheld in order to correct the failing (see 6.19 below)
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.		Complaints Policy, section 6 'The Complaints Officer'.	Standard templates are in place which ensure all points raised are addressed and responded to. The role of the Complaints Officer is to ensure all points have been addressed, and to refer back to the investigator if not. Decisions are based on whether a failing has occurred based on what our Policy (and the law) says we should do, including reviewing the handling of the stage 1 investigation to assess whether it was in-line with the Complaints Policy.
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		Complaints Policy, section 6 'The Complaints Officer'.	Standard templates are in place which ensure all points raised are addressed and responded to.  Letter templates include: <ul style="list-style-type: none"> <li>• a reminder of the description of the complaint as agreed during the acknowledgement phase,</li> <li>• the residents desired outcome</li> <li>• A summary of the investigation findings on each point raised</li> </ul>



	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			<p>including whether we were at fault,</p> <ul style="list-style-type: none"> <li>• The overall outcome (upheld or not upheld),</li> <li>• what we will do to put it right including any award of compensation or good will gesture,</li> <li>• what we will do to stop it happening again,</li> <li>• confirmation that the resident has exhausted our Complaints Policy and details of how to contact the housing ombudsman should they remain dissatisfied.</li> </ul>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.		Complaints Policy section 5 'How we deal with Complaints'.	All stage 2 complaints are investigated by an executive officer to ensure accountability and quality. A check list for complaint investigation is in place and investigators are expected to conduct robust investigations.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising.</li> </ul>		Complaints Policy section 5 'How we deal with Complaints'.	Letter templates expect respondents to acknowledge errors, provide an apology, and confirm action taken to correct the issue, and any learning that has been determined




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	<ul style="list-style-type: none"> <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>			<p>as a way to prevent the error from reoccurring.</p> <p>Financial redress is guided by a Compensation Policy which provides for policy and statutory compensation, as well as good will gesture recompense for impact on wellbeing due to enduring the issue encountered, and for pursuing their complaint.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	✓	Arches Housing Compensation Policy	Financial redress is guided by a Compensation Policy which provides for policy and statutory compensation, as well as good will gesture recompense for impact on wellbeing due to enduring the issue encountered, and for pursuing their complaint.
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.	✓	Complaints Policy, section 6 'The Complaints Officer'.	The role of the Complaints Officer is to oversee complaint outcomes and letters based on structured templates. Stage 2 outcome letters include what we will do to put it right including any award of compensation or good will gesture,
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	✓	Arches Housing Compensation Policy	



## 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: <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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>any findings of non-compliance with this Code by the Ombudsman.</li> <li>the service improvements made as a result of the learning from complaints.</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol>		<p>Complaints Policy section 9, 'Legal and Regulatory' &amp; 11, 'Governance, Assurance and Reporting'.</p> <p>Annual Complaints Performance and Service Improvement Report 2023-24.</p>	<p>Section 9.2 states: The Social Housing (Regulation) Act 2023 requires that members of The Housing Ombudsman scheme demonstrate compliance with the statutory Housing Ombudsman Complaint Handling Code, including reporting self-assessments to the Housing Ombudsman, annually.</p> <p>Section 11.3 states: Monitoring of the delivery of this Policy will be the responsibility of the Board of Management via:</p> <ul style="list-style-type: none"> <li>Quarterly Complaints Report</li> <li>Annual Key Performance Indicators (KPI)</li> <li><b>Annual Performance and Service Improvement Report</b>, including self-assessment against the Complaint Handling Code.</li> </ul>
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's		Annual Complaints Performance and Service Improvement Report 2023-24 – reported to the Board of Management 29 <sup>th</sup> April 2024.	The report is published on the Arches Housing website <a href="#">here</a> .


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	response to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	✓	Complaints Policy, section 9, 'Legal and Regulatory'.	Section 9.2 states: The Social Housing (Regulation) Act 2023 requires that members of The Housing Ombudsman scheme demonstrate compliance with the statutory Housing Ombudsman Complaint Handling Code, including reporting self-assessments to the Housing Ombudsman, annually.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	✓	Complaints Policy, section 9, 'Legal and Regulatory'.	Section 9.2 states: The Social Housing (Regulation) Act 2023 requires that members of The Housing Ombudsman scheme demonstrate compliance with the statutory Housing Ombudsman Complaint Handling Code, including reporting self-assessments to the Housing Ombudsman, annually.
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.	✓	Complaints Policy, section 9, 'Legal and Regulatory'	Section 9.2 states: The Social Housing (Regulation) Act 2023 requires that members of The Housing Ombudsman scheme demonstrate compliance with the statutory Housing Ombudsman Complaint Handling Code, including reporting self-assessments to the Housing Ombudsman, annually.

## 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.		Learning from Complaints action tracker.	All learning identified from individual complaints and complaint handling is captured onto an action tracker for discussion by the operations leadership team, with all arising actions tracked to completion.
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.		Learning from Complaints action tracker.	All learning identified from individual complaints and complaint handling is captured onto an action tracker for discussion by the operations leadership team, with all arising actions tracked to completion.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Complaints Policy, section 11, 'Governance, Assurance and Reporting'.	<p>Section 11.3: Monitoring of the delivery of this Policy will be the responsibility of the Board of Management via:</p> <ul style="list-style-type: none"> <li>• Quarterly Complaints Report</li> <li>• Annual Key Performance Indicators (KPI)</li> <li>• Annual Performance and Service Improvement Report, including self-assessment against the Complaint Handling Code.</li> </ul> <p>Section 11.4: Learning from complaints is reported regularly on the Performance section of the Arches Housing website.</p>

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				Complaints Performance and Learning is reported to Neighbourhood Network resident group.
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.		Complaints Policy, section 6 'The Complaints Officer'.	<p>The Complaints Officer is an impartial role that does not investigate complaints but has access to staff at all levels to facilitate the prompt resolution of complaints, having the authority and autonomy to act to resolve disputes fairly and at the earliest point. (6.1)</p> <p>The complaints officer is also responsible for facilitating Learning from Complaints and ensuring actions identified are progressed, working with relevant Policy and service owners to realise change through processes and systems.</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').		Arches Housing Governance Manual	<p>The role of the MRC is set out in the Governance Manual.</p> <p>Governance describes how Board Members exercise overall direction and control of the Association. The Governance Manual is the procedures, policies, documents, and management arrangements, which are in place to administer and control the Association effectively, including financing and delivery of services.</p>

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				The current MRC is the Chair of the Customer, People and Governance Committee.
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.		Arches Housing Governance Manual	<p>Governance Manual section 3.2.6: The purpose of the Member Responsible for Complaints ('MRC') is to:</p> <ul style="list-style-type: none"> <li>• Promote a positive complaint handling culture within Arches Housing.</li> <li>• Ensure the Board receives regular information on complaints that provides insight on the landlord's complaint handling performance.</li> <li>• Have access to suitable information and staff to perform this role and report on their findings.</li> <li>• Ensure compliance with the statutory Complaint Handling Code insofar as the role of the Board pertains.</li> </ul>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> <li>regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</li> <li>regular reviews of issues and trends arising from complaint handling.</li> </ol>		Arches Housing Governance Manual	Enabling the execution of their duties, the Complaints Officer meets with the MRC prior to each quarterly Board meeting to present the proposed Complaints Performance Report and discuss progress, outcomes and learning. The Report includes all of the items listed a-d.

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	<ul style="list-style-type: none"> <li>c. 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>d. annual complaints performance and service improvement report.</li> </ul>			
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> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		Complaints Policy, section 7, 'Working with Contractors and Third Parties',	<p>Section 7.1 states: We have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> <li>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and,</li> <li>c) act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> <p>Where dissatisfaction that is recognised to be a Complaint is made to any contractor or third party, that concerns a service that they have provided on behalf of Arches Housing, they will refer this to</p>

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				<p>us so that we can investigate this impartially and in-line with this Policy.</p> <p>All relevant staff receive regular training on the importance and process for complaint handling.</p> <p>Closed complaint cases are explored within operations team meetings and contractor management meetings to generate a collaborative and creative environment for improving services for residents.</p>