## Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes/ No	Evidence	Commentary/ explanation
1.2	A complaint must be defined as:  '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.'	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints- and-comments-policy.pdf (plymouthcommunityhom es.co.uk)  Page 3 – Section 3.1 (Definition of a complaint)	This definition is referred to in our policy as well as within any complaints training delivered to customer facing colleagues. The definition has not changed since the introduction of the new Code and therefore is still current.  Training has been provided to staff members in 2023/24 and will continue to be rolled out to reflect the Complaint Handling Code.
				Meetings have taken place with the Executive, Senior Managers, individual staff and management teams to highlight the requirements of the Code.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and-comments-policy.pdf (plymouthcommunityhom es.co.uk)  Page 3 – Section 3.1 (Definition of a complaint)  Page 5 – Section 3.3 (Advocacy and Support)  Quick Guide to Complaint Logging (internal procedure)	The requirement to record dissatisfaction which fits the definition is clearly explained to all staff during the delivery of complaint handling training.  Training has been provided to staff members in 2023/24 and will continue to be rolled out to reflect the Complaint Handling Code.  We encourage customers to tell us where something has gone wrong, or they are dissatisfied with our service, and this links closely to being given a choice to make a complaint.  We accept and handle complaints from any third parties or representatives.
			Complaint Handling Training slide content	This approach is publicised on our website within the Customer Complaints and Comments policy.

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	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and-comments-policy.pdf (plymouthcommunityhom es.co.uk)  Page 3 – Section 3.1 (Definition of a complaint)  Tenant Satisfaction Measures and Performance Report are available on the website – Our performance (plymouthcommunityhom es.co.uk)	Contacts/ReACT) are monitored and reviewed for trends, performance and customer satisfaction.
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	Complaint satisfaction surveys  Pentana complaint system  Outstanding Work spreadsheet (internal)	Complaints are tracked and monitored through to a satisfactory conclusion, and an action tracker is used to ensure that complaints are fully resolved with the completion of any outstanding works

	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though		Complaints satisfaction surveys  External/independent	Follow-up surveys with residents are made after a complaint is closed.
1.6	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	Tenant Satisfaction Measures and Performance Report are available on the website  Our performance (plymouthcommunityhom	Should dissatisfaction remain, and be confirmed during contact, any outstanding issue that is raised is followed up for any further necessary actions.  An external/independent company also
			es.co.uk)  Customer Complaints and Comments Policy, updated May 2024 - customer-complaints- and-comments-policy.pdf (plymouthcommunityhom es.co.uk)	undertake satisfaction surveys, and any dissatisfaction is provided in a feedback report and acted upon as necessary.
			Page 3 – Section 3.1 (Definition of a complaint)	

#### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes/ No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk)  Page 3 – Section 3.1 (Definition of a complaint	Complaints are only declined if they do not meet the agreed definition, or if they clearly meet one of the exclusions as defined in the PCH policy. This is after careful consideration, and discussion.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:  The issue giving rise to the complaint occurred over twelve months ago.  Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk)  Page 3 – Section 3.1 (Definition of a complaint)	These exclusions are clearly set out in the policy and are closely aligned to the suggestions and examples as set out by the Housing Ombudsman Service in its guidance.

	Particulars of Claim, having been filed at court.  Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk)  Page 4 – Section 3.1 (Definition of a complaint)	The PCH policy reflects this requirement. Discretion would always be used on a case-by-case basis, be reasonable in its final decision, and advise the complainant should it not be possible to accept their request
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	Customer Complaints and Comments Policy	If a customer has specifically requested a complaint be raised, or if a colleague has raised a complaint which it later transpires cannot be accepted, we will write to the customer setting out the reasons why the matter is not suitable for the complaints process.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk)	Complaints are considered on a case-by-case basis, and the individual circumstances of the complaint considered.
			Page 3 – Section 3.1 (Definition of a complaint)	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Customer can make a complaint by using any of the following channels: Telephone Email Live Chat Face to Face Social Media In writing Website MyPCH portal  PCH website - Make a complaint (plymouthcommunityhomes.co .uk)  Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and-comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 4 - Section 3.2 Complaint Handling	We continue to explore additional avenues, should they exist for customers to be able to easily make a complaint using the most accessible option, taking fully into account their communication preferences
			Equality and Diversity Policy - equality-diversity-and-inclusion- strategy-2021-2026.pdf	
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	Jannet Story – available to all staff informing them of the New Complaint Code - New Complaint Code from 1 April   Jannet (rewardgateway.co.uk) - Internal  Complaint Code Q&A Teams Meeting held with SMT/WMT - 20th March 2024  26th April 2024 – Email sent from Policy and Performance to whole organisation highlighting policy update  Complaint Handling Training to be updated to reflect changes to the Code  Regular feedback to staff following complaint auditing to ensure compliance with the Code and Policy  Attendance at management meetings to raise awareness of the complaint process  Attendance at Stage 2 complaint meetings	Complaint Handling Training specifically provides an overview of the process, and how customers can make a complaint, focusing on staff acknowledging that they are able to take the details of a resident's issues
			Customer Experience Team are a point of reference to provide to staff handling 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	Publicising that PCH welcome complaints. This was carried out in Spring 2024 in our In Touch quarterly publication - Welcome (readz.com)  Customer Complaints and Comments policy confirms an accessible process - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and-comments-policy.pdf (plymouthcommunityhomes.co.uk) — Page 4, Section 3.2 Complaint Handling Complaint volumes are monitored with regular reporting - Performance Reports are available on the website — Our performance (plymouthcommunityhomes.co.uk)	Complaint, Compliment and Customer Satisfaction information is reported to the Executive, Senior Managers, and the Customer Focus Committee on a monthly/quarterly basis. The Member responsible for complaints meets with the Head of Customer Experience on a regular basis to discuss all aspects of the complaints process.
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	Customer Complaints and Comments Policy is available on the website as well as other information relating to the complaint process - Make a complaint (plymouthcommunityhomes.co.uk)	The current policy reflects the Housing Ombudsman Complaint Handling Code and is published on the PCH 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.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer- complaints-and-comments- policy.pdf (plymouthcommunityhomes.co.uk) - Page 4, Section 3.2 Complaint Handling	The current policy explains that it will be published on the website which includes information about the Housing Ombudsman Service and the Code.  Annual Self-Assessments with the Code are also published on the website.

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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer- complaints-and-comments- policy.pdf (plymouthcommunityhomes.co.uk) - Page 5, Section 3.3 Advocacy and Support	This is clearly defined within our policy, and reasonable adjustments would be made to accommodate any requests
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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk) - Page 7 - Section 3.4 Complaint Stages	Information relating to escalation and accessing the Housing Ombudsman is clearly defined within the policy, and letter templates give clear information about how to access the Housing Ombudsman Service including their address, and other contact details.
			Complaint letter templates include the Housing Ombudsman details Housing Ombudsman details are published on the website	

Section 4: Complaint Handling StaffCode provision	Code requirement  Landlords must have a person or team	Comply: Yes / No	Evidence  Customer Experience Team	Commentary <i>I</i> explanation  The Head of Customer
4.1	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	within PCH are structured to respond to the code requirement	Experience has responsibility for ensuring that this is in place
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	Customer Experience Team Job Descriptions	The Complaints Officer, and staff reporting directly to this role have authority and autonomy to liaise with any staff within the organisation who may be dealing with complaints, and liaise with customers about their complaints
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	Complaint Handling Training to be updated to reflect changes to the Code  Regular feedback to staff following complaint auditing to ensure compliance with the Code and Policy  Attendance at management meetings to raise awareness of the complaint process  Attendance at Stage 2 complaint meetings  Customer Experience Team are a point of reference to provide to staff handling complaints	Complaint Handling Training is offered to staff who are customer facing, and deal with complaints on a rolling programme.

Section 5: The Complaint Handling ProcessCode provision	Code requirement	Comply: Yes/ No	Evidence	Commentary I explanation
•	Landlords must have a single policy in		Customer Complaints and	The policy has been implemented and approved

	The Complaint Handling ProcessCode provision	Code requirement	Comply: Yes/ No	Evidence	Commentary I 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	Customer Complaints and Comments Policy - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk)	The policy has been implemented and approved in line with the Housing Ombudsman Complaint Code
	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 O' or 'informal complaint') as this causes unnecessary confusion.	Yes	Customer Complaints and Comments Policy - customer- complaints-and-comments- policy.pdf (plymouthcommunityhomes.co.uk)	There are no further stages within the policy, other than the recommended 2-stage process as per the Housing Ombudsman Service/Complaint Code
•	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	Customer Complaints and Comments Policy - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk)	PCH has a 2-stage complaint policy, which reflects the requirements of the Housing Ombudsman complaint code

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	Customer Complaints and Comments Policy shared with Contractors	All complaints relating to PCH would be dealt with in line with our complaint policy. Residents would not be expected to go through two complaints processes.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Customer Complaints and Comments Policy shared with Contractors	Contractors are advised within statutory contract meetings of the need to follow the code.
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	Responses to complaints would include this content	Responses are in line with complaint code content
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	Pentana case recording	At the point of complaint acknowledgement, it is not always clear what the landlord is responsible for until initial discussion with the complainant has taken place at the 2-day point. However, the complaint response at either stage will

				clearly include this information.
5.8	At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and  d. consider all relevant information and evidence carefully.	Yes	Complaint Handling Training to be updated to reflect changes to the Code  Regular feedback to staff following complaint auditing to ensure compliance with the Code and Policy  Attendance at management meetings to raise awareness of the complaint process  Attendance at Stage 2 complaint meetings  Customer Experience Team are a point of reference to provide to staff handling complaints	Contact is made on day 2 after receipt of the complaint to a complainant which would include a-d in line with PCH values.
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	Holding letters  Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6 - Section 3.4 Complaint Stages	A holding letter would be requested and approved by the Head of Customer Experience in agreement with the resident, and in exceptional circumstances. This would be in line with the Code timescales.
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.	Yes	Case recording on Pentana	Ongoing 'Know Your Customer' priority to include recording of disabilities/vulnerabilities and any required reasonable adjustments. This will ensure there is a clear process across the

	Any agreed reasonable adjustments must be kept under active review.			organisation and opportunity to keep under active review. Currently this information can be stored within the Northgate Tenancy Management System.
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	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 3 – Section 3.1 (Complaints)	We would not refuse to escalate a complaint through all stages, unless there was a valid reason or exclusion applied.
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	Complaints Monitoring System - Pentana	All complaints are logged on the Pentana system, which includes a full case record. Should we be asked to submit evidence to the Housing Ombudsman Service, or reference this at an escalated stage this is available.
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	Yes	Complaints Monitoring System - Pentana	Ongoing discussion/communication takes place with the resident throughout their complaint Remedies are suggested without the need for escalation.

	complaints process without the need for escalation.			
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	Reasonable Behaviour Guidance Policy  Unacceptable User Actions and Behaviour (plymouthcommunityhomes.co.uk)  Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and-comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 8 – Section 6 (Reasonable behaviour)	An reasonable behaviour guidance policy is in place to deal with these issues should they arise. Often also linked to the risk alert process, which involves a panel considering a case where unacceptable behaviour from residents has taken place.
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	Reasonable Behaviour Guidance Policy <u>Unacceptable User Actions and Behaviour</u> (plymouthcommunityhomes.co.uk)	Restrictions are monitored regularly to ensure they remain proportionate and relevant.
			Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 8 – Section 6 (Reasonable behaviour)	

## **Section 6: Complaints Stages**

#### Stage 1

Code provision	Code requirement	Comply: Yes/ No	Evidence	Commentary/ explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk)  Quick Guide to Complaint Logging (internal procedure)	Contact with a resident is attempted by Day 2 of receipt of the complaint, to gather more information regarding the complaint. There is potential for the member of staff to resolve the complaint with the resident's agreement at this point. Complaint guidance notes and training also support this approach.  The PCH Contact Centre have implemented a process to identify vulnerabilities at First Point of Contact when Damp and Mould inspections are requested.

				38% of complaints were closed Day 6 or earlier in 2023/24
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) – Page 6, Section 3.4 Complaint Stages	This is detailed within the guidance notes for staff (internal) and will be included in the complaint handling training  The complaint process adheres to the Complaint Code.  Staff continue to be briefed on the "code"
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer complaints- and- comments- policy.pdf (plymouthco mmunityhom es.co.uk) - Page 6, Section 3.4 Complaint Stages	Complaint process adheres to the Complaint Code old and new.  In 2023/24, 1% of the total volume of Stage 1 complaints received were resolved out of timescale.
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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages	In 2023/24, 4% of all Stage 1 complaints received the required Holding Letter to be sent informing the resident that an extension to resolve the complaint would be required.

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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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - <u>customer</u> complaints-and-comments-	PCH letter templates for complaint extension and responses at both stages include the contact details
	the someon details of the empademan.		complaints-artic-comments- policy.pdf (plymouthcommunityhomes.co.uk) – Page 6, Section 3.4 Complaint Stages Letter templates	for the Ombudsman.
	A complaint response must be provided to the resident when the answer to the complaint is known, not when the			Outstanding actions are monitored regularly by the Customer Experience Team.
6.6	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	Complaints Action Tracker	Lead Officers are to follow up to confirm completion and to ensure regular communication is provided to the resident until the actions are complete. This requirement has been communicated to Lead Officers and we continue to monitor progress to embed regular contact with the resident as part of the overall complaint process.
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	Customer Complaints and Comments Policy - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk)	Complaint handling training to be delivered in line with the new Code.  PCH provide letter writing training for relevant staff.  Complaint response letters include prompts for staff to ensure all relevant information is included as per the Code requirements.
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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk) — Page 6, Section 3.4 Complaint Stages	Complaint stages are detailed within the PCH policy.

	Landlords must confirm the following in writing to the resident at the completion			
6.9	of stage 1 in clear, plain language:     a. the complaint stage;     b. the complaint definition;     c. the decision on the complaint.     d. the reasons for any decisions made;     e. the details of any remedy offered			Complaint response letters include prompts for staff to ensure all relevant information is included for residents.
	to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Letter templates	Additionally, there is standard wording to ensure details of how to escalate to Stage 2.

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary I 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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages	Complaint stages are detailed within the PCH policy.

6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes .co.uk) – Page 6, Section 3.4 Complaint StagesPentana Case	Our Pentana complaint system evidence dates of contact to support.
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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages	Reasonable efforts are made to understand why a resident remains unhappy to fully investigate their complaint at Stage 2. This includes the option of face-to-face contact between the resident and staff.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint StagesInternal Stage 2 Complaints Procedure (QA)	Detailed within the complaints procedure
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages  Internal Stage 2 Complaints Procedure (QA)	Detailed within the complaints procedure
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason,	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages Internal Stage 2 Complaints Procedure (QA)	Detailed within the complaints procedure

	and the reason(s) must be clearly		T	T
	and the reason(s) must be clearly explained to the resident.			
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	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer-complaints-and- comments-policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages	Detailed within the complaints procedure
			Response letter templates	
			Pentana case record	
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	Complaints Action Tracker	Outstanding actions are monitored regularly by the Customer Experience Team.  Lead Officers are to follow up to confirm completion and to ensure regular communication is provided to the resident until the actions are complete. This requirement has been communicated to Lead Officers and we are monitoring progress to embed regular contact with the resident as part of the overall complaint process.
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	Customer Complaints and Comments Policy - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk)	Complaint handling training to be delivered in line with the new Code.  PCH provide letter writing training for relevant staff.  Complaint response letters include prompts for staff to ensure all relevant information is included for residents.  Individual support meetings are also available to consider content of complaint responses

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			Complaint response letters include prompts for staff to ensure all relevant information is included for residents.
	to put things right;  f. details of any outstanding actions; and  g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Letter templates	Additionally, there is standard wording to ensure details of how to escalate to the Ombudsman Service is included.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Customer Complaints and Comments Policy - Customer Complaints and Comments Policy, updated May 2024 - customer- complaints-and-comments- policy.pdf (plymouthcommunityhomes.co.uk) - Page 6, Section 3.4 Complaint Stages Internal Stage 2 Complaints Procedure	All relevant/suitable staff members are involved in order to prepare a full response to the resident.

# Section 7: Putting things right

Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These can include:  Apologising; Acknowledging where things have gone wrong;  Providing an explanation,  These can include:  Apologising; Acknowledging where things Providing an explanation,  These can include:  Stage 2 complaints and Comments Policy - customer-complaints and response letters include prompts to ensure this information is covered as per the Code.  Letter templates  Response letter approval process  Stage 2 complaint meetings  Policy includes compensation for financia	Code	Code requirement	Comply:	Evidence	Commentary / explanation
correction or addendum;  Providing a financial remedy; Changing policies, procedures, or	provision	Intends to take, to put things right.  These can include:  Apologising; Acknowledging where things have gone wrong;  Providing an explanation, assistance or reasons;  Taking action if there has been delay;  Reconsidering or changing a decision;  Amending a record or adding a correction or addendum;  Providing a financial remedy;	Yes/ No	Comments Policy - <u>customer-complaints-and-comments-policy.pdf</u> (plymouthcommunityhomes.co.uk)  Letter templates  Response letter approval process	information is covered as per the Code.  Guidance notes are produced for staff in regards to letter writing.  Policy includes compensation for financial remedy where appropriate -

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Housing Ombudsman Remedy Guidance	For financial remedy - Reference is made to the Housing Ombudsman remedy guidance.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Letter templates  Complaints Action Tracker	Complaint response letters include prompts for staff to ensure all relevant information is included for residents as per the Code.Outstanding actions are monitored regularly by the Customer Experience Team and reference to Lead

				Officers is made to confirm completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Housing Ombudsman Remedy Guidance	Members of Customer Experience staff regularly attend Housing Ombudsman conferences and webinars for latest approaches and guidance.  The Head of Customer Experience is a member of a national forum to share learning on complaint handling.

#### Section 8: Putting things right

Code provision	Code requirement	Comply: Yes/ No	Evidence	Commentary I explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and  f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Annual Complaints Report	Annual Complaints report highlighting the areas in 8.1 is approved by the Customer Focus Committee

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8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	As above	Following the approval by Customer Focus Committee, the annual report is published as required in 8.2
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	Should there be a significant restructure, merger and/or change in procedures this will be actioned
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	Should there be an Ombudsman investigation we would take steps to review and update the self- assessment
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	N/A	Should there be a cyber incident, the Ombudsman would be informed, and other actions under 8.5 taken

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes/ No	Evidence	Commentary I 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	Quarterly Complaints Reporting  Audit of individual Complaints	Each complaint is considered through the lens of service improvement, and these are then linked back to learning for the relevant department, and improvements in how services can be delivered and improved.
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	Lessons Learned from complaint handling and feedback to staff has resulted in improvements in service delivery	The annual and quarterly complaint reports include lessons learned from complaints at each stage demonstrating the positive changes in service delivery.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Quarterly complaint reports	Learning and improvements are a strong focus for quarterly reports that are presented to Senior Management and the Customer Focus Committee. They are also discussed at Management Team meetings

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	Head of Customer Experience Job Description	The Head of Customer Experience is responsible for compliance with 9.4
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	Chair of Customer Focus Committee is the Member Responsible for Complaints	Regular meetings between the MRC and the Head of Customer Experience take place to discuss the requirements of the Code
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	MRC feedback to Board	Having met with the HoCE the MRC provides feedback to the full Board
9.7	As a minimum, the MRC, and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;	Yes	MRC minuted feedback to Board	Having met with the HoCE the MRC provides feedback to the full Board. Meetings take place on a quarterly basis

b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and  c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Relevant staff Job Descriptions for staff who are involved in complaints reflect this.  Customer Complaints and Comments Policy is shared with Contractors	Complaint handling training is delivered to staff who deal with complaints  Raise non-conformance for third parties if complaints are upheld which are discussed at contract meetings