

Housing Ombudsman Complaints Handling Code

Self Assessment March 2024



Appendix B - Self Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	This is clearly outlined in our Comments, Compliments and Complaints Policy (section 2.0), on our website and also in our compliments and complaints leaflet . These are available on our website.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	All our team members have been trained to recognise that any form of dissatisfaction from our tenants could be treated as a formal complaint. Our dedicated customer insight team specialises in customer satisfaction and improvements, they coordinate any contact from tenants who are dissatisfied (including a representative on their behalf), whether by direct contact or identified by a colleague.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	If a tenant expresses dissatisfaction with our service, we will try to put things right at the earliest possible opportunity. Our customer insight team may be able to resolve the issue for the tenant quickly without it becoming a formal complaint. Where we believe this is appropriate, we will ask if the tenant wants to follow our Early Resolution process. Through this process we will attempt to resolve the matter within four working days before a formal complaint is made. If we are unable to resolve the issue to the tenant's satisfaction within this timescale, we will escalate it to Stage 1 of our complaints process. Tenants can refuse the option of Early Resolution and move straight to Stage 1 of our complaints process if they wish to do so. This is explained in section 3.2 and 3.3 of the Comments, Compliments and Complaints Policy and is also on our compliments and complaints leaflet .

Section 1 - Definition of a complaint

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>All complaints are accepted unless they fall into specific exclusions listed in our Comments, Compliments and Complaints Policy (section 6). Example of issues we do not consider as complaints are:</p> <ul style="list-style-type: none"> • An initial request for information on a service. This will include initial reports of a repair or damage to a property, initial requests for a copy of a Tenancy Agreement, or an initial enquiry seeking clarification on information included in a service charge budget or accounts. These will be handled as service requests. • Has previously been considered as a complaint and completed the process. • Legal proceedings have started. • The issue giving rise to the complaint occurred over six months ago. • Feedback gathered through proactive customer surveys such as our transactional satisfaction surveys. • Allegations of anti-social behaviour (as defined by our Nuisance and Anti-Social Behaviour Policy). In this instance, the report will be passed through to our housing team who are best placed to resolve these issues and will do so in line with our Nuisance and Anti-Social Behaviour Policy. We will, however, consider complaints in respect of the failure in the delivery of our anti-social behaviour service. • Anonymous letters. We may still investigate but it will not be registered as a formal complaint. • Issues that are not Two Rivers Housing's responsibility or are outside our control. This will include issues such as the collection of bins or estate maintenance for land we do not own. • Disputes about service charges for example, whether they are reasonable, unless the complaint is about how we dealt with the dispute. For example, we will consider complaints about how charges are calculated, communicated, and consulted on, as well as our process for granting access to inspect accounts. However, if the complaint is specifically around the level of service charge, then this will not meet the criteria of a formal complaint. • Claims for damages of over £5,000 (we will handle these in line with our insurance procedures). • Any claim or complaint to do with personal injury (we will handle these in line with our insurance procedures). • Where the Unacceptable Behaviour Policy has been applied.

Section 1 - Definition of a complaint

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Our Comments, Compliments and Complaints Policy clearly outlines the specific circumstances where a complaint will not be considered.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	In circumstances where a formal complaint or part of a complaint is refused, our customer insight team will provide a full explanation of why the complaint (or part of it) has been refused. If the tenant is dissatisfied with this decision, we will advise of the complainant of their right to approach to the Ombudsman. This is confirmed in section 6.3 of the Comments, Compliments and Complaints Policy .

Section 1 - Definition of a complaint

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Our front-line teams are trained to recognise what is a request for service compared to where there has been a potential service failure. If in any doubt, this can be checked with our customer insight team, who will confirm this and discuss any dissatisfaction with the tenant.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Survey feedback is not automatically treated as a complaint especially where they are automated transactional surveys. Where any low scores or causes for concern are registered from surveys or Tenant Satisfaction Measures and tenants wish to be contacted further on the matter, our customer insight team will call them at the earliest possible opportunity to discuss the reasons for their dissatisfaction raising a formal complaint where necessary.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>We provide multiple ways to register a complaint including by:</p> <ul style="list-style-type: none"> • Phone • Letter • Email • Via our website • Face-to-face • Via social media (using our official pages only, as we are unable to monitor any other feeds) <p>This information is readily available on our website, in the compliments and complaints leaflet and in our Tenant Handbook. Our team is also on hand to advise of all methods if a tenant does not wish to raise a complaint with them at the time.</p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>Our Comments, Compliments and Complaints Policy is available in the library section of our website or via the link on our complaints page.</p> <p>The information regarding stages and timescales are also contained in the compliments and complaints leaflet and the Tenant Handbook, which again is accessible on our website.</p> <p>For those tenants with no internet access, all policies and supporting leaflets can be sent out via post at their request.</p> <p>We also offer a translation service for postal requests where required.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>Our website provides details on how to raise how to raise a complaint.</p> <p>Our Comments, Compliments and Complaints Policy and the compliments and complaints leaflet are visible from the complaint's page and the library section.</p> <p>The Tenant Handbook is also available from the library section. This also includes details on how to raise a complaint.</p>

Section 2 - Accessibility and awareness

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>We can provide additional support to tenants if they have difficulty accessing the complaints service. This may include providing information in appropriate alternative formats, via nominated third parties or a home visit.</p> <p>All known vulnerabilities information/data is captured as part of the acknowledgement process. This may include any specific requirements that a tenant/complainant may have.</p> <p>We have also completed ED&I training with Stage 1 and Stage 2 investigating officers to support their understanding of any requirements to make reasonable adjustments.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>We publish full details on the complaints page on our website.</p> <p>Our compliments and complaints leaflet, which explains the complaints process and how to contact the Housing Ombudsman are also provided with every Stage 1 acknowledgement letter along with our Tenant Handbook.</p> <p>Our Stage 1 and Stage 2 responses provided full details for the Housing Ombudsman and how tenants can get in touch if they remain dissatisfied.</p> <p>Information about our complaints process and how to make a complaint is also regularly included in our quarterly magazine Tenant Topics.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We publish the full details for the Ombudsman on our website, in our responses, Tenant Topics magazine and our compliments and complaints leaflet.</p>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	<p>When tenants raise a complaint, we make them aware at all stages of the complaint of their right to seek advice from the Housing Ombudsman Service.</p>

Section 2 - Accessibility and awareness

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	<p>We only accept complaints through our official social media channels.</p> <p>In such cases, we will validate the details via direct messaging to ensure we remain GDPR compliant.</p> <p>This is confirmed in section 5.2 of the Comments, Compliments and Complaints Policy.</p>

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>Our customer insight team lead by the Head of Customers, is a dedicated specialist team. They handle our complaints process and support the wider organisation to improve customer satisfaction and makes service improvements based on customer feedback.</p> <p>The Customer Insight Business Partner works directly with Investigating Officers to oversee complaints performance and compliance to the Code. This is also support by the customer insight team.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>The Head of Customers has worked extensively in the customer service sector, leading teams within social housing and the commercial sector with direct responsibility for complaints for over 20 years.</p> <p>The Head of Customers and the customer insight team work independently from operational teams to ensure no conflicts of interest exist.</p> <p>In addition, any Investigating Officer is not permitted to handle a complaint if they are either mentioned and/or have previously been involved in the process.</p> <p>Our Investigating Officers also receive continuous development at fortnightly working groups, feedback from audits and from a quarterly Complaints Oversight Group.</p>

Section 3 - Complaint handling personnel

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>We have invested in independent training from HQN to improve our complaints handling.</p> <p>Our fortnightly working group includes best practice, feedback on what has gone well and where we can improve as part of our continuous improvement plan.</p> <p>All employees received customer service training in November and December 2023, which included how to deal with distressed and upset tenants.</p> <p>The quarterly Complaints Oversight Group focusses on:</p> <ul style="list-style-type: none"> • The quality of responses. • The speed in resolution. • The supporting evidence. • If the outcome was fair, reasonable, and proportionate. <p>The Group includes a member of our Tenants' Voice panel and outcomes of these meetings form part of our ongoing improvement plans.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/ records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	<p>Where it is appropriate and in line with Ombudsman guidance, the customer insight team always clarify and agree whether the tenant wishes to try our four day early resolution process or register a formal complaint immediately.</p> <p>This information is documented on our CRM case management system to provide a full audit trail.</p> <p>If the customer insight team are unable to resolve the issues to the tenant's satisfaction within four days, a formal complaint is registered and acknowledged on the fifth day.</p> <p>This is confirmed in section 3 of the Comments, Compliments and Complaints Policy.</p> <p>We do not have extra named stages such as Stage 0.</p> <p>We acknowledge complaints within five working days of receipt. Any complaints received at 3pm will not be included in that working day and the five day acknowledgement timescale will begin from the next working day.</p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	<p>During initial conversation with the tenant, our customer insight team will seek to ensure there is a clear understanding of the reason for the complaint and the desired resolution the tenant is seeking. This will be mutually agreed prior to an acknowledgement being sent out.</p> <p>This is referred to in section 3.4 of the Comments, Compliments and Complaints Policy.</p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>Complaints are conducted by Investigating Officers who have no prior involvement in the case and will be handled fairly, objectively, and professionally at all times.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>Our Investigating Officers will have no conflict of interest or prior involvement with complaints allocated to them.</p> <p>We have provided additional training to improve how cases are managed and to look at the wider picture to reduce the potential for repeat issues.</p> <p>Our customer insight team provide all of the available logged system data including call recordings to Investigating Officers for consideration during investigations.</p> <p>All investigations remain confidential as far as possible for the both the duration of the complaint and after the complaint has been resolved. Details are restricted to Investigating Officers, Customer Insight and Senior Managers.</p>
4.11	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication</p>	Yes	<p>We endeavour to keep our tenants updated through the progress of the case.</p> <p>In the first instance, reasonable arrangements are captured by the customer insight team upon acknowledgement of the complaint.</p> <p>Investigating Officers will also outline agreements including the frequency of contact during their initial communications. This can be adjusted to any changing needs of the tenant.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> set out their position comment on any adverse findings before a final decision is made. 	Yes	<p>We will always explore key facts, review all relevant systems and any recorded conversations as part of any investigation. This includes taking statements and listening to all views to ensure all things are considered to reach a fair outcome.</p> <p>Following our continuous improvement process review, we now contact tenants to discuss the findings at each stage of the complaint to give them the opportunity to comment on any of the findings prior to a written response being sent.</p> <p>Where a tenant requests to be contacted in writing only, this may restrict our ability to contact the tenant to discuss our findings before they are sent out.</p> <p>This is confirmed in sections 3.7 and 3.9 of the Comments, Compliments and Complaints Policy.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>Our Comments, Compliments and Complaints Policy, Tenant Handbook, and compliments and complaints leaflet all confirm that tenants have 20 working days from the date of the Stage 1 response to escalate the complaint to Stage 2.</p> <p>The timescales of 20 working days for escalation are also specified in all of our Stage 1 response letters.</p> <p>Our Stage 2 responses confirm the details for escalating any complaint to the Housing Ombudsman if the tenant remains dissatisfied with our response.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	<p>Reasons for refusals are clearly set out in sections 3.18, 3.19 and 6 of the Comments, Compliments and Complaints Policy.</p> <p>We will only refuse to escalate a complaint to Stage 2 where there is valid reason to do so and/or the Stage 1 response represents our final position on the matter. An example of this would be where a tenant is not satisfied with the Stage 1 investigation but is unable to provide detail as to what they disagree with, where the service failing is, or requesting an outcome that is not reasonably possible for example an immediate eviction.</p> <p>If we decide not to escalate a complaint to Stage 2, the tenant will be provided with a written explanation detailing the reasons and advised of their right to refer the matter to the Housing Ombudsman Service.</p> <p>Reasons for refusals are set out in sections 3.18, 3.19 and section 6 of the Comments, Compliments and Complaints Policy.</p> <p>There have been no refusals to escalate to Stage 2 of our complaints process in the last 12 months.</p>
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	<p>A full record of the complaint including each Stage, together with all corresponding evidence and records are kept within a centralised filing system. This filing system has restricted access and is managed by the customer insight team.</p> <p>Following our continuous improvement assessment, contact with tenants during the complaint and any subsequent follow up contact is now recorded on our CRM and case management system for full audit purposes.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	<p>We recognise that some tenants can be frustrated, upset or angry when raising a complaint. We will always try to work with our tenants in these circumstances however, we also have a duty of care to our team members and contractors. We will not accept unreasonable behaviour from complainants or people acting on their behalf.</p> <p>In certain scenarios and to protect our team members and contractors, we may have to enact our Unacceptable Behaviour or our Zero Tolerance policies. These address circumstances where unreasonable volumes of contact, abusive or threatening behaviour (including of acts physical violence) are apparent. In these circumstances we will clearly outline what the issues are and how we will proceed.</p>

Section 4 - Complaint handling principles

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>As part of the initial complaint logging process, the customer insight team liaises with tenants to understand the complaint and any desired outcomes mutually agreeing these prior to acknowledging the complaint.</p> <p>Where there are unrealistic or unachievable outcomes for example, insisting on an eviction or demanding immediate attendance, we will be clear this will not be possible and instead look at more suitable and practicable outcomes.</p> <p>Investigating Officers will also outline what is feasible throughout the investigation process.</p>

Section 4 - Complaint handling principles

Best practice 'should' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	<p>Our customer insight team coordinates any initial contact from tenants who are dissatisfied within the timescale set out in the Housing Ombudsman Complaint Handling Code,</p> <p>In line with Ombudsman guidance, the customer insight team always clarify and agree with complainant whether they wish to try four day early resolution or register as formal complaint immediately.</p> <p>Our investigating officers will always attempt to resolve the complaint the earliest possible opportunity to provide the best solution available for the complainant.</p>
4.5	Landlords should 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 where this is reasonable.	Yes	<p>We will accept complaints from:</p> <ul style="list-style-type: none"> • any of our customers (tenants, Shared Owners, or leaseholders). • former customers. • people who have applied for housing. • non-residents. • members of the public. • a group of customers, where there is a single representative, and issues are affecting all customers equally. <p>If a tenant gives us express permission, we will accept complaints on their behalf from:</p> <ul style="list-style-type: none"> • anyone acting as their representative. • third parties. • family members. <p>We will accept complaints from anyone who is a formal representative of any of the above, including:</p> <ul style="list-style-type: none"> • MPs. • Councillors. • Citizens Advice Bureau. • the Community Legal Service. <p>This is included in Section 4 of the Comments, Compliments and Complaints Policy.</p>

Section 4 - Complaint handling principles

Best practice 'should' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Training has been provided to existing and new investigating officers to ensure any legal obligations are identified. These are also laid out in the Comments, Compliments and Complaints Policy .
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<p>Complaints about the conduct or behaviour of our team members or other parties acting on behalf of Two Rivers Housing will be addressed as internal matters following the appropriate policies.</p> <p>In these scenarios, complainants are given relevant information about the outcome of their complaint however, personal employment related information will not be shared in line with confidentiality and GDPR.</p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	<p>We endeavour to update tenants wherever possible through the investigation and through any subsequent follow up work.</p> <p>Our Head of Customers and customer insight team have oversight of progress and follow up works through a tracker to ensure all actions are completed, evidenced, and that tenants are satisfied with the outcome.</p> <p>The Complaints Oversight Group quarterly reviews all suitable evidence to ensure we keep complainant updated.</p>

Section 4 - Complaint handling principles

Best practice 'should' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>We seek feedback from our Tenant Satisfaction Measures, which is completed three times per year.</p> <p>Our customer insight team complete follow up satisfaction calls with most Stage 2 complaints to seek further feedback on how the overall process was handled and could be improved upon.</p> <p>We recognise the importance of tenant involvement and complaint performance is an ongoing agenda item in our bi-monthly Tenant Voice scrutiny committee. This group also contains the Two Rivers Housing Chair of the Board and Tenant Board Member providing direct access to complaint feedback from our tenants to the Board.</p> <p>Our Complaint Oversight Group lead by the Head of Customers is in place to audit complaints on a quarterly basis. The group is inclusive of tenants. We have received direct feedback from a tenant involved in this group on how insightful the meeting was, and how encouraged they were to see how we act upon complaints and the level of detail that is investigated.</p>
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	<p>We use any complaints as an opportunity for improvement even when a complaint has not been upheld.</p> <p>The Complaints Working Group discuss ongoing issues, lessons learnt and develop action plans for best practice to reduce the risk or recurrence.</p> <p>The customer insight team monitor any follow up works and seek evidence for lessons learnt through a tracker system. The Customer Insight Business Partner holds weekly progress meetings with relevant head of service flagging any concerns to the Head of Customers.</p> <p>Complaints performance and themes are regularly reviewed by the Senior Management Group and the Assistant Directors for continuous improvement across the organisation.</p>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	<p>Restrictions put in place from the Unacceptable Behaviour and Zero Tolerance policies, such as single points of contact, will be appropriate to the needs of the tenant and in line with the Equality Act 2021.</p> <p>There have been no occurrences of any contact restrictions in the last 12 months.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>We aim to resolve all complaints with the timescales set out in Housing Ombudsman Complaint Handling Code.</p> <p>The average life of a Stage 1 complaint is within 10 working days as outlined in the Code. There have been some complaints that have taken longer than 10 days to resolve and have exceeded this at times during the last 12 months.</p> <p>To minimise cases where this has occurred, we have adopted a new process where three-day reminders are sent from our customer insight team ahead of deadline date to Investigating Officer.</p> <p>Any extensions must have approval from the Head of Customers with a clear explanation to why an extension is required. If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.</p>
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	<p>Our Investigating Officers provide written responses once the investigation stage has been completed. Wherever possible, we highlight in the complaint response the timescales where we expect all outstanding action will be completed.</p> <p>Any outstanding actions are tracked by our customer insight team and monitored in weekly business partner meetings with the appropriate department.</p> <p>Although responses are sent, cases are not fully closed until all outstanding actions and lessons learned have been completed and evidenced.</p> <p>Our Customer Insight Business Partner holds weekly progress meetings with appropriate business areas.</p>
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>As part of our Complaints Oversight Group findings and continuous improvement, we have provided additional training to Investigating Officers to ensure that all points are addressed with clear rationale behind the decision.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1 (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	<p>We have updated our standard templates and provided additional training to ensure all points are covered.</p> <p>We have recognised improvement was needed in this area, and subsequently introduced a checklist which is included within investigation reports to ensure all points addressed.</p> <p>The Head of Customers and the customer insight team review random selections of responses to ensure all criteria is reached.</p> <p>The Complaints Oversight Group also assess the quality and detail in responses are in line with the Housing Ombudsman Complaint Handling Code.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	<p>If the tenant is not satisfied with the outcome of the Stage 1 investigation, they can escalate the complaint Stage 2. The tenant should request a Stage 2 review within 20 working days. In exceptional circumstances, the Head of Customers may consider a Stage 2 (review) after this period has expired.</p> <p>In the event we decide not to escalate a complaint to Stage 2, the tenant will be provided with a written explanation detailing the reasons and advised of their right to refer the matter to the Housing Ombudsman Service.</p> <p>Reasons for refusals are set out in sections 3.18, 3.19 and section 6 of the Comments, Compliments and Complaints Policy.</p> <p>There have been no refusals to escalate to Stage 2 complaint in the last 12 months.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 2 (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	The customer insight team and the complainant will mutually agree what the grounds are for escalating the complaint, the outstanding issues and the requested outcome when acknowledging the Stage 2 request.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Agreed
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	If a Stage 2 escalation is requested, this will be reviewed by an independent person who has not previously considered the complaint. Stage 2 complaints are managed by Assistant Directors or Executive Directors. This is confirmed in section 3.14 of the Comments, Compliments and Complaints Policy .
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	We aim to resolve all complaints within the timescales set out in Housing Ombudsman Complaint Handling Code. All Stage 2 complaints have been responded to within the target time or within an extended timeframe agreed with the tenant. Three day reminders are sent from our customer insight team ahead of deadline date to Investigating Officer managing the Stage 2 complaint. Any extensions must gain approval from the Head of Customers with a clear explanation to why an extension is required. If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 2 (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>We have updated our standard templates and provided additional training to ensure all points are covered and a checklist is included within investigation reports to ensure all points addressed.</p> <p>The Head of Customers or the customer insight team review all Stage 2 responses to ensure all criteria is reached.</p> <p>The Complaints Oversight Group also assess the quality and detail in responses are in line with the Housing Ombudsman Complaint Handling Code.</p> <p>We operate a two stage process, and details are included in written response on how to escalate the matter to the Housing Ombudsman Service if they remain dissatisfied.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	<p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.</p>	N/A	<p>Two Rivers Housing does not have a three stage process.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 3 (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	Two Rivers Housing does not have a three stage process.

Section 5 - Complaint stages

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<p>We aim to resolve all complaints with the timescales set out in Housing Ombudsman Complaint Handling Code.</p> <p>Any extensions must gain approval from the Head of Customers with a clear explanation to why an extension is required. If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.</p>
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	<p>In the event an agreement is unable to be reached for an extension, we will refer the tenant to the Housing Ombudsman Service.</p> <p>We publicise the Housing Ombudsman Services contact details at all stages and within the compliments and complaints leaflet (included with initial acknowledgement communication). The details are also available on our website and in the Tenant Handbook and are regularly published in our quarterly Tenant Topics magazine.</p>

Section 5 - Complaint stages

Best practice 'should' requirements

Stage 1 (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	If the problem is a recurring issue, any data or information relevant to the complaint, whether present or historic, is considered during the complaint investigation.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	<p>There are occasions where further issues are highlighted during the investigation stage. If they are relevant to the complaint, these details will be recorded and included in the investigation.</p> <p>Where the Stage 1 response has been issued, or it would unreasonably delay the response, a new complaint will be registered.</p> <p>If the additional complaint points are not relevant to initial complaint i.e. a separate issue, a further complaint will be raised to address this new matter.</p>

Section 5 - Complaint stages

Best practice 'should' requirements

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<p>We aim to resolve all complaints with the timescales set out in Housing Ombudsman Complaint Handling Code.</p> <p>Any extensions must gain approval from the Head of Customers with a clear explanation to why an extension is required. If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.</p>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	<p>In the event an agreement is unable to be reached for an extension, we will refer the tenant to the Housing Ombudsman Service.</p> <p>We publicise the Housing Ombudsman Services contact details at all stages and within the compliments and complaints leaflet (included with initial acknowledgement communication). The details are also available on our website and in the Tenant Handbook and are regularly published in our quarterly Tenant Topics magazine.</p> <p>Outlined in section 3.15 of the Comments, Compliments and Complaints Policy.</p>

Section 5 - Complaint stages

Best practice 'should' requirements

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	Two Rivers Housing does not have a three stage process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Two Rivers Housing does not have a three stage process

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	<p>The customer insight team coordinates any contact from tenants who are dissatisfied. In line with Ombudsman guidance, the customer insight team always clarify and agree with complainant whether they wish to try four day early resolution or register as formal complaint immediately in a bid to resolve any issues at the earliest opportunity.</p> <p>As part of the investigation process, the Investigating Officer will acknowledge where we have gone wrong, confirm how we intend to put things right, and wherever possible, highlight the learnings to minimise the risk of the issue reoccurring.</p>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	<p>Agreed. We offer a clear definition on any awards within the Compensation Policy.</p> <p>Any other remedies offered will be fair, reasonable, and proportionate to the service failure taking into account the impact it has caused including any vulnerabilities</p>

Section 6 - Putting things right

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.5	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	Remedies may include an action plan agreed with the tenant setting out agreements on timescales wherever possible for example agreed appointment dates for repair works in addition to any discretionary compensatory awards. Our customer insight team monitor outstanding remedies through to completion before closing the case fully on the internal complaint tracker.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Our Compensation Policy clearly outlines the difference between statutory payments (such as the right to repair) and any quantifiable loss, which is awarded separately from any discretionary award and is based on an impact assessment. This is confirmed in our Compensation Policy . We also use any learning from previous Housing Ombudsman determinations in relation to remedies to improve our approach in this area as best practice.

Section 6 - Putting things right

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	<p>We use any complaints as an opportunity for improvement even when a complaint has not been upheld.</p> <p>The Complaints Working Group discuss ongoing issues and lessons learnt and develops action plans for best practice to reduce the risk or recurrence. This is completed as a cross-team discussion to understand any impact that potential changes may have on the wider business or tenants.</p> <p>Our investigation templates include the policies and procedures reviewed during the investigation and any potential changes that will need to be made. These are completed at both stages of the complaints process.</p> <p>Complaints performance and themes are regularly reviewed by the Senior Management Group and the Assistant Directors for continuous improvement across the organisation.</p> <p>This is a continuous improvement area and assessed at a Quarterly Complaints Oversight Group.</p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	<p>We always attempt to resolve issue through our complaints process. Where relevant, we may seek further legal advice, where appropriate this may include wording used in responses.</p>

Section 7 – Continuous learning and improvement

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	<p>We recognise and encourage a positive complaint handling culture. We include wider learning in our Annual Report and quarterly Tenant Topics magazine.</p> <p>Complaint performance and learning is an ongoing agenda item in our bi-monthly Tenants’ Voice scrutiny committee. This group also contains the Two Rivers Housing Chair of the Board and Tenant Board Member providing direct access to complaint feedback and learnings directly into the Board.</p> <p>Learning is included within the Complaints Working Group, Senior Management Group, Assistant Directors and Complaints Oversight Group.</p> <p>The Head of Customers will be sponsored by the Executive Director of People and Neighbourhoods to further ensure learning is established across the organisation.</p>

Section 7 – Continuous learning and improvement

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord’s complaint handling performance.	Yes	Non-executive Director Sharon Wilkins has been appointed as our Board Member responsible for overseeing complaints.

Section 7 – Continuous learning and improvement

Best practice 'should' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>The Head of Customers presents complaints performance to the weekly complaints working group and the Senior Management Group monthly including volumes, performance, trends, and learning.</p> <p>Assistant Directors and Executive Directors have monthly performance figures and summaries of issues and risks. These are subsequently presented to the Two Rivers Housing Board.</p> <p>All learning and outcomes from Severe Maladministration findings are circulated and tracked through to ensure all agreed upon management actions are completed.</p> <p>Complaint performance, learning and themes is an ongoing agenda item in our bi-monthly Tenants' Voice scrutiny committee.</p> <p>The annual self-assessment is made available for scrutiny to operational managers, involved tenants, our executive team and Board.</p>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	Yes	<p>All themes and trends from complaints are shared regularly with the Senior Management Group, Complaints Working Group and Assistant and Executive Directors, to inform service improvements.</p> <p>Findings form a key part of our continuous improvement and training programme for both team members and contractors.</p>

Section 7 – Continuous learning and improvement

Best practice 'should' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>Our Complaints Working Group and Senior Management Group has been key to delivering improved collaborative working across departments not just for complaints but also general ways of working.</p> <p>We operate a non-blame culture with a focus on putting things right, learning from our mistakes, and taking responsibility for our actions, teams, contractors, and business areas.</p> <p>All feedback is constructive with a view to looking across the wider organisation.</p> <p>We have invested in additional training in business improvement for our customer insight team as well as training in complaint handling and customer service across the organisation to encourage a positive complaint handling culture in line with professional standards.</p>

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	The annual self-assessment evidencing compliance to the Complaint Handling Code will be published by annually by 31 March.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The self-assessment will be reviewed every quarter by the Head of Customers to ensure any changes are captured and we remain compliant with the Complaint Handling Code.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none">• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents• include the self-assessment in their annual report section on complaints handling performance	Yes	<p>The self-assessment has been reported to the executive team, the Board and the Tenants' Voice scrutiny committee.</p> <p>The complaints data included within our Annual Report and the self-assessment has been published on our website.</p>

More about Two Rivers Housing

 www.tworivershousing.org.uk

 Rivers Meet, Cleeve Mill Lane, Newent, Gloucestershire, GL18 1DS

 www.linkedin.com/company/TwoRiversHousing

 www.facebook.com/TwoRiversHousing

 www.twitter.com/TRHousing

Company registration number: 4263691

Homes and Communities Agency number: L4385

Registered charity number: 1104723



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How to complain to Two Rivers Housing

You can make a complaint about our services in writing, by email, over the phone, through our official social media channels or in person.

We will work with you to try and resolve your complaint, however you can also contact the Housing Ombudsman at any time.

Write to:

The Housing Ombudsman Service
PO Box 1484
Unit D
Preston
PR2 0ET

Phone: 0300 111 3000
(Mon-Fri from 9:00am to 5:00pm)

Email: info@housing-ombudsman.org.uk

Fax: 020 7831 1942