

Housing Ombudsman Complaints Handling Code Self Assessment December 2024



Self assessment form

This self assessment form has been completed by the Complaints Officer and is reviewed and approved by our Group Board at least annually.

Once approved, we publish the self assessment as part of our annual complaints performance and service improvement report on our website. We also publish the Group Board's response to our complaints performance in our Annual Complaints Report.

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

The Housing Ombudsman recognises that there may be a small number of circumstances where we are unable to meet the requirements. In these circumstances, it expects us to deliver the intentions of the Code in an alternative way. This document sets out how we have delivered against and met the Housing Ombudsman's Complaints Code during 2024.

Section 1 - Definition of a complaint

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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Complaints, Comments and Compliments Policy Compliments and Complaints Leaflet Website	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 documents are available on our website.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes		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.

Section 1 - Definition of a complaint

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	Please see section 6.2 Complaints, Comments and Compliments Policy	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	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	Please see section 2.1 Complaints, Comments and Compliments Policy.	All expressions of dissatisfaction where there have been perceived failures from any service requests will be offered the formal complaint route. This will not obstruct any work continuing on the service request while the investigation is underway.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Tenant Topics Spring 2024	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. How to register a complaint is regularly shared on our social media pages, website and our in our tenant magazine.

Section 2 - Exclusions

<p>2.1</p>	<p>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</p>	<p>Yes</p>	<p>Please see section 6 of the Complaints, Comments and Compliments Policy.</p>	<p>All complaints are accepted unless they fall into specific exclusions listed in our Comments, Compliments and Complaints Policy (section 6). Examples 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. • An issue that has previously been considered as a complaint and completed the process. • Where legal proceedings have started. • The issue giving rise to the complaint occurred over 12 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 AntiSocial 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.
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Section 2 - Exclusions

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p><u>Please see section 6 of the Complaints, Comments and Compliments Policy.</u></p>	<p>Our Comments, Compliments and Complaints Policy clearly outlines the specific circumstances where a complaint will not be considered in Section 6.</p>
2.3	<p>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.</p>	Yes	<p><u>See section 6.2 of the Complaints, Comments and Compliments Policy.</u></p>	<p>Our Comments, Compliments and Complaints Policy specifies that we will accept complaints within 12 months of the issues occurring and/or within 12 months of the tenant becoming aware of the issue.</p> <p>Cases older than 12 months may be considered by the Head of Customers on a case by case basis.</p>
2.4	<p>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.</p>	Yes	<p><u>This is confirmed in section 6.3 of the Comments, Compliments and Complaints Policy.</u></p>	<p>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.</p> <p>If the tenant is dissatisfied with this decision, we will advise the complainant of their right to approach to the Housing Ombudsman Service.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p><u>This is confirmed in section 6.2 of the Comments, Compliments and Complaints Policy.</u></p>	<p>All exclusions are based on a case-by-case process.</p>

Section 3 - Accessibility and awareness

<p>3.1</p>	<p>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.</p>	<p>Yes</p>	<p><u>Please see section 3.8 and 4 of the Comments, Compliments and Complaints Policy.</u></p> <p><u>This is also included in our Compliments and Complaints Leaflet.</u></p>	<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> <p>Our customer insight team and investigating managers will check if any reasonable adjustments are required to support customers during the complaint process, taking into consideration any vulnerabilities within the household.</p> <p>We also check and assess against vulnerabilities and anything raised during the acknowledgement calls and emails. This is recorded on the investigation template for example: please communicate by email as tenant is hard of hearing or tenant can only be contacted after a certain time. This is common practice</p>
<p>3.2</p>	<p>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.</p>	<p>Yes</p>	<p><u>Please see section 5.2 of the Comments, Compliments and Complaints Policy.</u></p>	<p>We accept complaints made in any way, including:</p> <ul style="list-style-type: none"> • Phone • Letter • Email • Via our website • Face-to-face • Through social media (using our official pages only, as we are unable to monitor any other feeds). Any complaints initially highlighted by Social Media will be direct messaged from the platform for confidentiality purposes <p>Our team are fully conversant with our complaints process, and we have a dedicated centralised email address for expressions of dissatisfaction to be registered.</p>

Section 3 - Accessibility and awareness

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes		Complaints are welcomed and seen as a positive way of learning and hearing our customer's voice. This is set out in the tone of our communication on complaints. Our complaint volumes are similar to other registered providers in the locality.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p><u>Comments, Compliments and Complaints Policy.</u></p> <p><u>Compliments and Complaints Leaflet</u></p> <p><u>Tenant Handbook</u></p>	Our Comments, Compliments and Complaints Policy is available in the library section of our website or via the link on our complaints page. 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. For those tenants with no internet access, all policies and supporting leaflets can be sent out via post at their request. We also offer a translation service for postal requests where required.
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	<u>Please see sections 2.4, 3.20 and 5.3 of the Comments, Compliments and Complaints Policy</u>	We have updated our Comments, Compliments and Complaints Policy to reflect our practice in publicising complaints policy and information about the Housing Ombudsman Complaint Handling Code.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<u>Please see sections 4.3 and 4.4 of the Comments, Compliments and Complaints Policy</u>	We have updated our Comments, Compliments and Complaints Policy to reflect our practice and outline who can make a complaint including representatives and the tenant's right to be accompanied.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p><u>Website complaints page</u></p> <p><u>Tenant Topics Spring 2024</u></p>	We publish the full details on how to contact the Housing Ombudsman on our website, in our responses, in our Tenant Topics magazine and in our Compliments and Complaints Leaflet. When tenants raise a complaint, we make them aware of their right to seek advice from the Housing Ombudsman Service at all stages of their complaint.

Section 4 - Complaint handling staff

4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		<p>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 Partners work directly with Investigating Officers to oversee complaints performance and compliance to the Housing Ombudsman Complaint Handling Code. This is also supported by the customer insight team.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes		<p>Our customer insight team, lead by the Head of Customers, and all investigating officers have full access to staff at all levels and autonomy to resolve complaints fully, promptly, and based on what is fair, reasonable, and proportionate.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes		<p>Complaints are seen as a core function and as a way of tailoring, developing, and improving our services.</p> <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>

Section 5 - The complaint handling process

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	Please see Comments, Compliments and Complaints Policy	Our Comments, Compliments and Complaints Policy clarifies our approach to complaints. This aligns with the Housing Ombudsman Complaint Handling Code. Raising a complaint does not affect a tenant's ongoing interactions with us.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Please see sections 3.1 – 3.3 of the Comments, Compliments and Complaints Policy	Where it is appropriate and in line with Housing Ombudsman's 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. This information is documented on our CRM case management system to provide a full audit trail. 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. This is confirmed in Section 3 of the Comments, Compliments and Complaints Policy. We do not have extra named stages such as Stage 0. We acknowledge complaints within five working days of receipt. Any complaints received after 3pm will not be included in that working day and the five day acknowledgement timescale will begin from the next working day.
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	Please see point 3.5 of the Comments, Compliments and Complaints Policy	We operate two stage complaint process.
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		All complaints are managed by a Two Rivers Housing representative. This will continue to align to our two stage process.

Section 5 - The complaint handling process

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		All complaints are managed and overseen by a Two Rivers Housing representative.
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	<u>This is referred to in section 3.4 of the Comments, Compliments and Complaints Policy</u>	<p>During initial conversations 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 approach is mirrored for any complaints escalated to Stage 2.</p>
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		<p>As part of the initial complaint logging or escalation 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>Where there are aspects that are not the responsibility of Two Rivers Housing, we will clarify why, and signpost to the relevant organisation responsible for example, the local authority for land not managed by us.</p> <p>Investigating Officers will also outline what is feasible throughout the investigation process.</p>

Section 5 - The complaint handling process

<p>5.8</p>	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> 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. 	<p>Yes</p>		<p>Complaint investigations 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> <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 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>
<p>5.9</p>	<p>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.</p>	<p>Yes</p>		<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>Investigating Officers will also outline agreements including the frequency of contact during their initial communications and any subsequent follow up activities after the complaint response has been sent. This can be adjusted to suit any changing needs of the tenant.</p>
<p>5.10</p>	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	<p>Yes</p>		<p>In the first instance, reasonable arrangements are captured by the customer insight team upon acknowledgement of the complaint.</p> <p>Disclosed disabilities are registered on the investigation forms and any further information provided during the investigation will be updated on our CRM system.</p> <p>All reasonable adjustments will be kept under review and can be amended based on the changing needs of the tenant.</p>

Section 5 - The complaint handling process

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	<p><u>Reasons for refusals are set out in sections 3.18, 3.19 and 6 of the Comments, Compliments and Complaints Policy.</u></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.</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 advising them of their right to refer the matter to the Housing Ombudsman Service.</p> <p>There have been no refusals to escalate to Stage 2 of our complaints process in the last 12 months.</p>
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes		<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>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes		<p>Our customer insight team and Investigating Officers are fully empowered to provide suitable remedies in line with the relevant policies and procedures.</p> <p>The Head of Customers or relevant Senior Manager will provide additional support where a suitable remedy is outside of our standard procedures for example compensatory awards over £1,000 that require executive approval.</p>

Section 5 - The complaint handling process

<p>5.14</p>	<p>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.</p>	<p>Yes</p>	<p><u>Unacceptable Behaviour Policy</u></p> <p><u>Zero Tolerance Policy</u></p>	<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 and/or abusive or threatening behaviour (including acts of physical violence) are apparent. In these circumstances we will clearly outline what the issues are and how we will proceed.</p>
<p>5.15</p>	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	<p>Yes</p>	<p><u>Please see section 4.1 of the Unacceptable Behaviour policy.</u></p>	<p>Protected characteristics under the Equality Act 2010 are considered prior to any contact restrictions or other sanctions being applied to ensure all reasonable adjustments have been made. We have updated our Acceptable Behaviour Policy to reflect this practice.</p> <p>We did not place any contacts restrictions under the Unacceptable Behaviour Policy in the financial year. (2023-2024)</p>

Section 6 - Complaints stages

Stage 1

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		<p>Complaints are investigated and responded to at the earliest opportunity.</p> <p>Risk of vulnerabilities are factored in and all follow ups and/or works are prioritised.</p> <p>On occasion, complex complaints may require extensions, but this will be agreed with the complainant with a clear reasoning why an extension is required.</p>
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	<p>Please see section 3.1 of the Comments, Compliments and Complaints Policy.</p>	<p>All complaints are acknowledged within five working days of the complaint being received.</p> <p>If the complaint is received after 3pm, this will not count towards a working day and the acknowledgement timescales will start from the next working day. For example, a complaint received after working hours will not be included as the first working day.</p>
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	<p>Please see section 3.10 of the Comments, Compliments and Complaints Policy.</p>	<p>We aim to resolve all complaints with the timescales set out in Housing Ombudsman Complaint Handling Code.</p> <p>A response with a clear outcome will be sent within 10 working days of the acknowledgement of the complaint. Where there are future actions needed to resolve a complaint, we will agree this with customers and provide clear timescales wherever possible.</p> <p>The average life of a Stage 1 complaint is within 10 working days as outlined in the Housing Ombudsman Complaint Handling Code. There have been a small number of complaints that have taken longer than 10 days to resolve and have exceeded this at times during the last 12 months.</p>
6.4	<p>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.</p> <p>Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.</p>	Yes	<p>Please see section 3.13 of the Comments, Compliments and Complaints Policy.</p>	<p>Any extensions must gain approval from the Head of Customers with a clear explanation to why an extension is required.</p> <p>If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.</p>

Section 6 - Complaints stages

Stage 1 (continued)

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	Please see section 3.13 of the Comments, Compliments and Complaints Policy.	All extensions are confirmed in writing and contact details for the Housing Ombudsman Service are included.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		<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 with the complainant being updated regularly.</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 Partners hold weekly progress meetings with appropriate business areas.</p>
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		<p>We have provided additional training to Investigating Officers to ensure that all points are addressed with clear rationale behind the decision.</p> <p>Complaint responses are reviewed by the customer insight team to ensure all points are addressed and are in line with the Housing Ombudsman Complaint Handling Code.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes		<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 the initial complaint, for example they are for a separate issue, a further complaint will be raised to address the new matter.</p>

Section 6 - Complaints stages

Stage 1 (continued)

6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes		<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 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>
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Stage 2

6.10	<p>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.</p>	Yes	<p><u>Please see section 3.12 of the Comments, Compliments and Complaints Policy.</u></p>	<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>
6.11	<p>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.</p>	Yes	<p><u>Please see section 3.14 of the Comments, Compliments and Complaints Policy.</u></p>	<p>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. Stage 2 escalations are acknowledged within five working days.</p>

Section 6 - Complaints stages

Stage 2 (continued)

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		The customer insight team will provide our understanding of the reasons for escalation and what the required outcomes are in agreement with the complainant, prior to the formal Stage 2 acknowledgement.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>This is confirmed in section 3.14 of the Comments, Compliments and Complaints Policy.</u>	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.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes		<p>We aim to resolve all complaints within the timescales set out in Housing Ombudsman Complaint Handling Code.</p> <p>All Stage 2 complaints have been responded to within the target time or within an extended timeframe agreed with the tenant.</p> <p>Ahead of deadline date, three day reminders are sent to Investigating Officer managing the Stage 2 complaint from our customer insight team.</p>
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<u>This is confirmed in section 3.15 of the Comments, Compliments and Complaints Policy.</u>	<p>Any extensions must gain approval from the Head of Customers with a clear explanation to why an extension is required.</p> <p>If approved, the extension requirements are discussed and agreed with the complainant and recorded in the complaint file.</p>

Section 6 - Complaints stages

Stage 2 (continued)

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	<u>Please see section 3.15 of the Comments, Compliments and Complaints Policy.</u>	All extensions are confirmed in writing and contact details for the Housing Ombudsman Service are included.
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		<p>Our Investigating Officers provide written responses once the investigation stage has been completed. Wherever possible, we highlight the timescales where we expect all outstanding action will be completed in the complaint response.</p> <p>Any outstanding actions are tracked by our customer insight team and monitored in weekly business partner meetings with the appropriate department. The complainant is also updated regularly.</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 Partners hold weekly progress meetings with appropriate business areas.</p>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		<p>We have provided additional training to Investigating Officers to ensure that all points are addressed with clear rationale behind the decision.</p> <p>Complaint responses are reviewed by the customer insight team to ensure all points are addressed and are in line with the Housing Ombudsman Complaint Handling Code.</p>

Section 6 - Complaints stages

Stage 2 (continued)

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes		We have updated our standard templates and provided additional training to ensure all points are covered. We have introduced a checklist, which is included within investigation reports to ensure all points addressed. The Head of Customers and the customer insight team review responses to ensure all criteria is reached.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Stage 2 complaints are managed by an appropriate Assistant Director or Executive Director who have access to all areas of the business. These responses are reviewed by the Head of Customer or a member of the customer insight team to ensure it aligns with the Housing Ombudsman Complaint Handling Code.

Section 7 - Putting things right

7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes		<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 our 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 (including appropriate compensatory awards), and wherever possible, highlight the learnings to minimise the risk of the issue reoccurring.</p> <p>Our investigation templates include information on what policies and procedures have been reviewed and subsequent improvements.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation Policy	<p>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 and including any vulnerabilities.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes		<p>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.</p> <p>Our customer insight team monitor outstanding remedies through to completion before closing the case fully on the internal complaint tracker.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation Policy	<p>Our compensation policy outlines our approach to financial redress.</p> <p>All other forms of redress are in line with the Ombudsman's recommendations.</p>

Section 8 - Putting things right

<p>8.1</p>	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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. 	<p>Yes</p>	<p><u>Annual Complaints Report</u></p> <p><u>Annual Housing Ombudsman Landlord Performance Report</u></p>	<p>The annual self-assessment evidencing compliance with the Housing Ombudsman Complaint Handling Code is published on our website.</p> <p>Our website also houses the Annual Complaints Report, which includes learnings.</p> <p>The Housing Ombudsman Service Landlord Performance Report can be found in the Library on our website and on our complaints page.</p> <p>We are compliant with the Housing Ombudsman Complaint Handling Code in all areas.</p>
<p>8.2</p>	<p>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 m</p>	<p>Yes</p>	<p><u>Annual Complaints Report</u></p>	<p>The Group Board position statement is on page two of our Annual Complaints Report.</p>
<p>8.3</p>	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	<p>Yes</p>		<p>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 Housing Ombudsman Complaint Handling Code.</p>

Section 8 - Putting things right

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Any requests for a review or update for the self-assessment will be completed at the request of the Housing Ombudsman Service.
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		Where our ability to investigate complaints are prevented due to exceptional circumstances, we will update tenants via social media and our website while informing the Housing Ombudsman Service providing of timescales.

Section 9 - Scrutiny and oversight: continuous learning and improvement

<p>9.1</p>	<p>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.</p>	<p>Yes</p>		<p>We use complaints as an opportunity for improvement even when a complaint has not been upheld.</p> <p>Investigating managers are trained to assess if there is a wider impact and improve overall services, processes, and procedures.</p> <p>The complaints working group discuss ongoing issues and lessons learned and develop action plans for best practice to reduce the risk of 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>
<p>9.2</p>	<p>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.</p>	<p>Yes</p>		<p>This is a core function of our customer insight team who meet department heads monthly to assess trends and lessons learned.</p> <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 9 - Scrutiny and oversight: continuous learning and improvement

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		<p>We recognise and encourage a positive complaint handling culture. We include wider learning in our Annual Report and Accounts 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 Chair of the Group Board and our Tenant Board Member, providing 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 supported by the Executive Director of People and Neighbourhoods to further ensure learning is established across the organisation.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		<p>The Head of Customers is accountable for complaint handling and leads the customer insight team.</p> <p>Themes and risks are continually assessed, tracked and reviewed with the appropriate Head of Service as continuous improvements.</p> <p>Any serious risk or potential systemic issues are registered with the leadership team and monitored until assurance has been provided that the risk no longer remains.</p>
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		<p>Non-Executive Director Sharon Wilkins has been appointed as our Board Member responsible for overseeing complaints.</p>
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes		<p>The MRC meets monthly with the Head of Customers, customer insight team and a lead from our Tenants' Voice Scrutiny Committee to assess performance and progress on complaints.</p>

Section 9 - Scrutiny and oversight: continuous learning and improvement

<p>9.7</p>	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	<p>Yes</p>		<p>The MRC meets monthly with the Head of Customers, customer insight team and a lead from our Tenants' Voice Scrutiny Committee to assess performance and progress on complaints.</p> <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 Group 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 the Group Board.</p>
<p>9.8</p>	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	<p>Yes</p>		<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>

More about Two Rivers Housing

 www.tworivershousing.org.uk

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 www.linkedin.com/company/TwoRiversHousing

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 www.twitter.com/TRHousing

Company registration number: 4263691

Homes and Communities Agency number: L4385

Registered charity number: 1104723



Version: December 2024

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