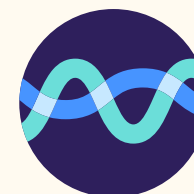




Dealing with complaints

2024-2025 Housing Ombudsman self-assessment



**Two
Rivers
Housing**

Self-assessment form

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

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website.

The governing body's response to the report must be published alongside this. Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

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



Section 1: Definition of a complaint

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Point 2.1 Complaints, Comments and Compliments Policy	This is clearly outlined in our Comments, Compliments and Complaints Policy, on our website and in our compliments and complaints leaflet. These 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		<p>Our front lines teams are aware that dissatisfaction can be treated as a complaint.</p> <p>Training session carried out for senior managers.</p> <p>Regular attendance of our Head of Customer Experience to present to various members of staff throughout the business wide meeting known as 'Two Talk Live'.</p> <p>Refresher session will be delivered in 2025/2026 and we also plan to roll this out as part of induction process in 2025/2026</p> <p>Our dedicated customer experience 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.</p>

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	Point 6.2 Complaints, Comments and Compliments Policy	<p>As part of their role, our customer experience team will recognise the difference between a request for service compared to where there has been a potential service failure.</p> <p>Where our front-line teams have any doubt, this can be checked with our customer experience team, who will confirm this and discuss any dissatisfaction with the tenant.</p>
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	Point 2.1 Complaints, Comments and Compliments Policy	<p>Where an expression of dissatisfaction has been identified or where there has been a perceived failures from any service requests, we aim to offer the formal complaint route.</p> <p>This will not obstruct any work continuing while the investigation is underway.</p>
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	Point 6.2 Complaints, Comments and Compliments Policy	<p>Survey feedback is not automatically treated as a complaint where they are automated transactional surveys.</p> <p>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 experience team will call them at the earliest possible opportunity to discuss the reasons for their dissatisfaction raising a formal complaint where necessary.</p> <p>How to register a complaint is regularly shared on our social media pages, website and in our tenant magazine.</p>

Section 2: Exclusions

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 6 Complaints, Comments and Compliments Policy	All complaints are accepted unless they fall into specific exclusions listed in our Comments, Compliments and Complaints Policy, however this will be judged by an appropriate manager on a case-by-case basis No complaints have been refused during 2024/2025.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none">• 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	Section 6 Complaints, Comments and Compliments Policy	All complaints are accepted unless they fall into specific exclusions listed in our Comments, Compliments and Complaints Policy, however this will be judged by an appropriate manager on a case-by-case basis.

Section 2: Exclusions

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Section 6.2 Complaints, Comments and Compliments Policy	<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 customer becoming aware of the issue.</p> <p>Cases older than 12 months may be considered by the Head of Customer Experience on a case-by-case basis.</p>
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Section 6.3 Complaints, Comments and Compliments Policy	<p>This is explicitly set out in our policy.</p> <p>In circumstances where a formal complaint or part of a complaint is refused, our customer experience 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 Housing Ombudsman.</p> <p>No complaints have been refused during 2024/2025.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 6.2 Complaints, Comments and Compliments Policy	<p>All exclusions are based on a case-by-case process.</p>

Section 3: Accessibility and Awareness

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Section 3.8 and 4 Complaints, Comments and Compliments Policy Compliments and Complaints Leaflet	<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 experience 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 check or assess against vulnerabilities, and anything raised during the acknowledgement calls and emails. This is recorded on the investigation template for example 'communication by email as tenant hard of hearing' or 'can only be contacted after a specific time'. This is common practice.</p>

Section 3: Accessibility and Awareness

3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Section 5.2 Complaints, Comments and Compliments Policy	<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>Staff are aware of our complaints process, and we have a dedicated centralised email address for expressions of dissatisfaction to be registered.</p> <p>Training sessions were delivered by Head of Customer Experience at all staff meetings in 2024/2025. Refresher sessions will be delivered in 2025/2026 and we also plan to roll this out as part of induction process from 2025/2026.</p>
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	Compliments and complaints leaflet	<p>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.</p> <p>Our complaint volumes are similar to other registered providers in the locality.</p>

Section 3: Accessibility and Awareness

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	Complaints, Comments and Compliments Policy Compliments and Complaints Leaflet Tenant Handbook (section 7)	<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>
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	Sections 2.4,3.20 and 5.3 Complaints, Comments and Compliments Policy	We have updated our Comments, Compliments and Complaints Policy to reflect our practice in publicising complaints policy and information about Housing Ombudsman 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	Sections 4.3 and 4.4 Complaints, Comments and Compliments Policy	Our Comments, Compliments and Complaints Policy outlines who can make a complaint including representatives and their right to be accompanied.

Section 3: Accessibility and Awareness

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	Two Rivers Housing website Complaints page Tenant Topics Out now: Tenant Topics Spring 2024 Page 9 Compliments and complaints leaflet	<p>We publish the full details for the Housing Ombudsman on our website, in our responses, in our Tenant Topics magazine and in our compliments and complaints leaflet.</p> <p>When tenants raise a complaint, we make them aware at all stages of the complaint process and of their right to seek advice from the Housing Ombudsman Service</p>
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Section 4: Complaint Handling Staff

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		<p>Our customer experience team lead by the Head of Customer Experience, 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 Experience Business Partners work directly with Investigating Officers to oversee complaints performance and compliance to the Code.</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 experience team lead by the Head of Customer Experience 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>

Section 4: Complaint Handling Staff

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>The Head of Customer Experience held a complaint workshop for all Investigating Officers on 30th July 2024 and has previously presented at all staff meetings, known as Two Talk Live.</p> <p>Refresher session will be delivered in 2025/2026 and we also plan to roll this out as part of induction process in 2025/2026.</p> <p>Our complaint investigation form includes lessons learned and actions planned to deliver improvements.</p> <p>We have recently made some improvements in how we are reviewing lessons learned and implementing actions which will include support from Customer Experience Business Partners for Investigating Officers to identify route cause, lessons learned, and actions to improve the experience of our tenants.</p> <p>We have also made system improvements, which will help with capturing complaints, escalation to prompt action, and reporting on themes and trends around complaints.</p>
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Section 5: The Complaint Handling Process

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints, Comments and Compliments Policy	<p>Our Comments, Compliments and Complaints Policy clarifies our approach to complaints which aligns with the Housing Ombudsman Code.</p> <p>Raising a complaint does not affect a tenant's ongoing interactions with us.</p>
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	Section 3.2 Complaints, Comments and Compliments Policy	<p>Where it is appropriate and in line with Housing Ombudsman guidance, the customer experience 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 experience 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>

Section 5: The Complaint Handling Process

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Point 3.5 Complaints, Comments and Compliments 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 relating to services provided by or on behalf of Two Rivers Housing are managed by a representative within Two Rivers Housing. This will continue to align to our two-stage process. Regular meetings take place with those delivering services on behalf of Two Rivers Housing to feedback on any dissatisfaction.
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	Point 3.4 Complaints, Comments and Compliments Policy	During initial conversations with the tenant, our customer experience 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. The understanding and resolution sought is set out in the acknowledgement letter. This approach is mirrored for any complaints escalated to Stage 2.

Section 5: The Complaint Handling Process

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 experience team liaises with tenants to understand the complaint and any desired outcomes are mutually agreed 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 that is not managed by us.</p> <p>Investigating Officers will also outline what is feasible throughout the investigation process.</p>
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Section 5: The Complaint Handling Process

5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully	Yes		<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> <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 experience 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, the customer experience team and Senior Managers.</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes		<p>During 2024/2025, 21 complaints were extended as agreed with the tenant, allowing an extra 10 working days for the response. When an extension has been agreed, correspondence is provided to the tenant to confirm the new date of response.</p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes		<p>In the first instance, reasonable adjustments are captured by the customer experience team upon acknowledgement of the complaint.</p> <p>Systems are updated where any disabilities have been shared.</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	Points 3.18 and 3.19 Section 6 Complaints, Comments and Compliments Policy	<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 advised 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 experience 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> <p>We recognise this is an area for improvement and have put measures in place to address this. All complaints are being reviewed by the customer experience team and the introduction of the new case management system will mean improved capturing of information, escalation if action is not taken and auditing and monitoring through improved reporting.</p>

Section 5: The Complaint Handling Process

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 experience team and Investigating Officers are fully empowered to provide suitable remedies in line with the relevant policies and procedures.</p> <p>The Head of Customer Experience or relevant Senior Manager 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>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Zero Tolerance Policy	<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> <p>We have had no cause to enforce this policy during 2024/2025.</p>

Section 5: The Complaint Handling Process



5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Point 4.1 Unacceptable Behaviour Policy	<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. Our Unacceptable Behaviour Policy sets this out.</p> <p>We did not place any contact restrictions under the Unacceptable Behaviour policy in 2024/2025.</p>
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Section 6: Complaints Stages

Stage 1

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes		<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>Complex complaints, on occasion, may require extensions but this will be agreed with the complainant with a clear reasoning why an extension is required. All extensions require approval from the Head of Customer Experience.</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>Point 3.1</p> <p>Complaints - Comments and Compliments</p>	<p>91% of complaints were acknowledged within five working days of being received. There was a small percentage delayed due to requiring further information from complainants taking it over the five days since the initial notification was 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, where a complaint is received after working hours this will not be included as the first working day.</p>

Section 6: Complaints Stages

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	No	<p>Point 3.10 Complaints, Comments and Compliments 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 should be sent within 10 workings 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 Code. There were eight occasions where Stage 1 responses fell outside of the 10 working days without extension in 2024/2025.</p> <p>During 2024/2025 we have seen an improvement with less complaints going over the 10 working days, although we acknowledge that more needs to be done.</p> <p>Therefore for 2025/2026 meeting reviews will take place between the Investigating Officer and a member of our customer experience team at day eigh, which will ensure that no complaints go over the 10 working days.</p> <p>22 Stage 1 complaints were extended with agreement of the complainant.</p>
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Section 6: Complaints Stages

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Point 3.13 Complaints, Comments and Compliments Policy	<p>Any extensions must have approval from the Head of Customer Experience 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>
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	Point 3.13 Complaints, Comments and Compliments Policy	<p>All extensions are confirmed in writing and contact details for the Housing Ombudsman service are included.</p>

Section 6: Complaints Stages

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 actions will be completed.</p> <p>Any outstanding actions are tracked by our customer experience team and monitored in regular 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 Experience Business Partners hold regular progress meetings with appropriate business areas.</p> <p>To further strengthen this, we have made some significant system improvements to enable follow up actions to be tracked individually through to completion, which will improve visibility and ownership.</p> <p>We have also created an additional Customer Experience Business Partner role to support Investigating Officers.</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 experience team to ensure all points are addressed and are in line with the Housing Ombudsman Code.</p>

Section 6: Complaints Stages

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 initial complaint for example they relate to a separate issue, a further complaint will be raised to address this new matter.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none">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; andg. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes		<p>A checklist is included within investigation reports to ensure all points addressed.</p> <p>The Head of Customer Experience and the customer experience team review responses to ensure all criteria is reached.</p> <p>We have template letters to support consistency with responses.</p>

Section 6: Complaints Stages

Stage 2

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Point 3.12 Complaints, Comments and Compliments Policy	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 Customer Experience may consider a Stage 2 (review) after this period has expired.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Point 3.14 Complaints, Comments and Compliments Policy	The customer experience team work with the complainant to understand the reason for escalating the complaint, the outstanding issues and the requested outcome. Stage 2 escalations are acknowledged within five working days.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes		The customer experience team will provide our understanding of the reasons for escalation and what the required outcome is 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	Point 3.14 Complaints, Comments and Compliments Policy	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 investigated by Assistant Directors or Executive Directors.

Section 6: Complaints Stages

6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Point 3.14 Complaints, Comments and Compliments Policy	<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>Three day reminders are sent from our customer experience team ahead of the deadline date to the Investigating Officer managing the Stage 2 complaint.</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	Point 3.15 Complaints, Comments and Compliments Policy	<p>Any extensions must have approval from the Head of Customer Experience 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> <p>Only one extension was required at Stage 2, this was due to the complexity of the case.</p>
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	Point 3.15 Complaints, Comments and Compliments Policy	<p>All extensions are confirmed in writing and contact details for the Housing Ombudsman service are included.</p>

Section 6: Complaints Stages

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 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 experience 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 Experience Business Partners hold monthly 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 experience team to ensure all points are addressed and are in line with the Housing Ombudsman Code.</p>

Section 6: Complaints Stages

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none">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; andg. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes		<p>A checklist is included within investigation reports to ensure all points addressed.</p> <p>The Head of Customer Experience and the customer experience team review responses to ensure all criteria is reached.</p> <p>We have template letters to support consistency with responses.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes		<p>Stage 2 complaints are managed by an appropriate Assistant Director or Executive Director who have access to all areas of the business.</p> <p>These responses are reviewed by the Head of Customer Experience or a member of the customer experience team to ensure it aligns with the code.</p>

Section 7: Putting things right

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • 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 experience team coordinates any contact from tenants who are dissatisfied.</p> <p>In line with Housing Ombudsman guidance, the customer experience team always clarify and agree with the complainant whether they wish to try our four day early resolution process or register a 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 and apologise 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 including any vulnerabilities.</p>

Section 7: Putting things rights

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 experience 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 Housing Ombudsman's recommendations.</p>

Section 8: Self-assessment, reporting and compliance

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
8.1	<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. 	Yes	<p>HOS Self Assessment</p> <p>Annual Complaints Report</p>	<p>The annual self-assessment evidencing compliance to the Complaint Handling Code is published on our website.</p> <p>Our website also houses the Annual Complaints Report which includes learnings.</p> <p>The annual Housing Ombudsman report is included on this page.</p> <p>We are compliant with the code in all areas.</p>

Section 8: Self-assessment, reporting and compliance

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual Complaints Report	The group position statement from our Chair, Member Responsible for Complaints and Tenant Representative is on page two of our Annual Complaints Reports.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Housing Ombudsman Complaints Handling Code HOS Self Assessment	The self-assessment will be reviewed every quarter by the Head of Customer Experience to ensure any changes are captured and we remain compliant with the Complaint Handling Code. We are developing a new subcommittee of the Board (Customer, Colleague and Culture) and they will deep dive into complaints and receive routine reviews of self-assessment throughout the year. This is being launched in 2025/2026
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 is prevented due to exceptional circumstances, we will update tenants via social media and our website while informing the Housing Ombudsman Service including updates on timescales. There have been no scenarios of this during the last 12 months.

Section 9: Scrutiny and oversight: continuous learning and improvement

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes		<p>We use any 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>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 is regularly reviewed by the Senior Management Group and the Leadership Team.</p> <p>To strengthen our approach and ensure Board are gaining assurance and have the ability to listen and learn from tenant voices, we are introducing a new committee of the Board – Customer, Colleague and Culture Committee in 2025/2026. They will routinely receive performance information on complaints and lessons learned.</p>

Section 9: Scrutiny and oversight: continuous learning and improvement

9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>This is supported by our customer experience team who meet department heads to review complaints, assess trends and lessons learned.</p> <p>As a result, we can demonstrate learning from complaints has led to service improvements.</p> <p>Learnings form a key part of our continuous improvement and training programme for both team members and contractors.</p> <p>This is an area we will continue to improve by strengthening the role the customer experience team play in supporting heads of service and Assistant Directors to review and capture lessons learned and actions to improve services.</p> <p>Our customer experience team have oversight of all complaints. This allows wider issues to be identified outside of the individual complaint or circumstance and enables us to assess any future impact.</p>
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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	Annual Review Tenants Topics (Summer 2024) Tenants Voice Agenda (July 2024)	<p>We recognise and encourage a positive complaint handling culture.</p> <p>We include wider leaning in our Annual Report and quarterly Tenant Topics magazine.</p> <p>Feedback has been provided to our Tenants' Voice Group including themes and learning at a customer experience workshop.</p> <p>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>The Head of Customer Experience will be sponsored by the Executive Director of People and Neighbourhoods to further ensure learning is established across the organisation.</p> <p>Lessons learned from complaints will be included in our 2024/2025 Annual Complaints Report. This will be published on our website and in our Tenant Topics magazine to all tenants.</p>
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Section 9: Scrutiny and oversight: continuous learning and improvement

9.4	<p>We recognise and encourage a positive complaint handling culture. We include wider leaning in our Annual Report and quarterly Tenant Topics magazine.</p> <p>Feedback has been provided to our Tenant Voice group including themes and learning at a Customer Experience workshop.</p> <p>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>The Head of Customer Experience will be sponsored by the Executive Director of People and Neighbourhoods to further ensure learning is established across the organisation.</p> <p>Lessons learned from complaints will be included in our annual review of complaints 2024/25. This will be publicised on our website and in our Tenant Topics publication to all tenants.</p>	Yes	Complaints, Comments and Compliments Policy	<p>The Head of Customer Experience is accountable for complaint handling and leads the customer experience team.</p> <p>Themes and risks are assessed, tracked by the Head of Customer Experience as continuous improvements.</p> <p>To further improve on this, we have added significant changes to our complaints management system, allowing greater visibility.</p> <p>A secondary Customer Experience Business Partner role has been created due to the importance of supporting the work around customer experience and lessons learned.</p> <p>The customer experience team will now be included earlier in the investigation process to discuss the findings and supporting Investigating Officers in their review and to help identify and understand the route cause both at Stage 1 and Stage 2.</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>
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Section 9: Scrutiny and oversight: continuous learning and improvement

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		Non-executive Board Member Sharon Wilkins has been appointed as our Member Responsible for Complaints (MRC).
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		The MRC meets routinely with the Head of Customer Experience, customer experience team and a lead from our Tenants' Voice Group to assess performance and progress on complaints.

Section 9: Scrutiny and oversight: continuous learning and improvement

9.7	<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.	Yes	<p>As per 9.6, the MRC meets routinely with the Head of Customer Experience, and a lead from our Tenants' Voice Group to assess performance and progress on complaints.</p> <p>Regular meetings between the Head of Customer Experience and the MRC began in 2024/2025. A standard agenda has been agreed including performance reporting, learnings, Housing Ombudsman determinations plus Tenant Satisfaction Measure results and the link to complaints.</p> <p>The MRC will feed this information into a newly formed Customer, Colleagues and Culture Committee and ultimately to the Two Rivers Housing Board.</p> <p>Executive Directors and Assistant Directors have monthly key complaints performance information and summaries of issues, this information is shared with the MRC.</p> <p>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 by the Head of Customer Experience to ensure all agreed upon management actions are completed.</p>
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Section 9: Scrutiny and oversight: continuous learning and improvement

9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none">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; andc. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	<p>This is an area we continue to strengthen and forms part of the Senior Management Group meetings where complaints are discussed as part of collaborative working across departments to ensure it remains a key focus for our organisation.</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 experience 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>
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