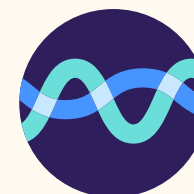




Housing Ombudsman Self-Assessment

2025-2026



**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	<i>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.'</i>	Yes	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy which was approved in May 2026)	This is clearly outlined in our Complaints, comments and Compliments Policy 2025-26 and in the new Complaints and Compliments Policy 2026-2029, on our website and in our compliments and complaints leaflet. These are available on our website. This is also included in training for investigating managers and the draft complaints page intranet site, being developed for staff.
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		Our front line teams are aware that dissatisfaction can be treated as a complaint. Training sessions carried out for complaint investigation managers in September and November 2025. Regular attendance by our Head of Customer Experience to present at all staff meeting known as 'Two Talk'. Refresher session delivered at Two Talks in November 2025 and plans are in place to roll out complaints training as part of new starter induction in 2026/27. Team specific briefing with repairs team managers and Customer Services Team. 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.

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	Page 5 Complaints, and Compliments Policy (old policy is superseded by new policy)	Our Customer Experience team as part of their role will recognise the difference between a request for service compared to where there has been a potential service failure. This was clarified at Two Talk Live – an all staff briefing in November 2025. 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. We have introduced changes to our complaint system to capture where a complaint is diverted to a service request, so we are able to log, monitor and report on it.
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	Complaints and Compliments Policy	Where an expression of dissatisfaction has been identified or where there has been a perceived service failures from any service requests, we aim to offer the formal complaint route. This will not obstruct any work continuing while the investigation is underway. This was reiterated as part of the Two Talks all staff briefing in November 2025 and training for investigating managers. This was reiterated to Customer Services Team during the May 2026 team development session.

Section 1: Definition of a complaint

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	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy)	Survey feedback is not automatically treated as a complaint where they are automated transactional surveys or through quarterly Tenant Satisfaction Measures. 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, the service area where the dissatisfaction relates to, call them at the earliest possible opportunity to discuss the reasons for their dissatisfaction raising a formal complaint where necessary. We also carry out follow up calls for dissatisfaction shown through transactional surveys (repairs). How to register a complaint is regularly shared on our social media pages, website and our tenant magazine.
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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	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy)	All complaints are accepted unless they fall into specific exclusions listed in our Complaints and Compliments Policy 2026, however this will be judged by an appropriate manager on a case-by-case basis. We made changes to the complaints case management system to improve recording of non-acceptance of complaints to enable us to monitor and report on this. This information is available through the complaints monitoring dashboard. In the case of non-acceptance of complaints, we always write to the tenant to explain the rationale and provide advice on next steps. We always provide the Ombudsman details.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. - Matters that have previously been considered under the complaints policy.	Yes	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy)	All complaints are accepted unless they fall into specific exclusions listed in our Complaints and Compliments Policy 2026, 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	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy)	Our Complaints and Compliments Policy specify that we will accept complaints within 12 months of the issues occurring and/or within 12 months of the resident becoming aware of the issue. Cases older than 12 months may be considered on a case-by-case basis.
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	Page 5 Complaints and Compliments Policy (old policy is superseded by new policy)	The reasons for not accepting a complaint are explicitly set out in our policy. 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. Where this happens, we will always provide an explanation in writing and advise of the complainant of their right to approach to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints and Compliments Policy	All exclusions are based on a case-by-case process. We will take account of individual circumstances and reasonable adjustments for the tenant or their household. We are asking if reasonable adjustments are required for all complaints and recording this information in the case management system.

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	Complaints and Compliments Policy Compliments and complaints leaflet	We provide multiple ways to register a complaint including by: • Phone • Letter • Email • Via our website • Face-to-face to a member of staff • Via social media (using our official pages only, as we are unable to monitor any other feeds). This was included in the training for investigating managers in September and November 2025. 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 or can raise a complaint on their behalf. Our Complaints leaflet makes this clear and more understandable for tenants. 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. We have introduced a new complaint case management system that includes a mandatory field to request reasonable adjustments as a way of checking this on all complaints. We have recently introduced an improvement whereby we capture which channel the complaint was made. This enables us to monitor most frequently used channels but also where we may need to raise awareness or improve accessibility of other channels. We are monitoring this through our complaints' performance dashboard.

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	Complaints and Compliments Policy	We accept complaints made in any way, including: • 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. Staff are aware of our complaints process, and we have a dedicated centralised email address for expressions of dissatisfaction to be registered. i.e. complaints@2rh.org.uk Refresher briefing held at Two Talks, all staff November meeting. We also plan to roll this out as part of induction process in 2026/27.
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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	Compliments and complaints leaflet Complaints are welcomed and seen as a positive way of learning and hearing our customers' voice. We have revised our Compliments and Complaints Policy to ensure tone and language reflect our positive complaints culture. We recognise that complaints are a valuable source of learning to help us develop exemplar services based on lived experience of our tenants. We are developing a complaint culture within the organisation where colleagues value complaints and are not defensive. This has been included in our training with investigating managers in November 2025. Two Rivers Member Responsible for Complaints (MRFC) champions this approach. The average complaint volumes for housing associations of our size are 28% for stage 1. We are slightly lower at 26%. The average for the sector is 53.5% We are slightly below the average (in our complaint volumes) compared to other registered providers of a similar size. For stage 2 the average is 10.3% we are 4.4%. Of the 13 lowest in the pool, we are 12th.
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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 time-frames for responding. The policy must also be published on the landlord's website.	Yes	Complaints and Compliments Policy Compliments and complaints leaflet Tenant Handbook (section 7)	Our Complaints and Compliments Policy is available in the library section of our website or via the link on our complaints page. The information regarding stages and time-scales is 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	Complaints and Compliments Policy	We have updated our complaints policy to reflect our practice in publicising complaints policy and information about the Ombudsman Code. We have updated template letters so that the right to refer to the Ombudsman is included at every stage of the complaint process.
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	Complaints and Compliments Policy	Our Compliments and Complaints Policy 2026 outlines who can make a complaint including representatives and their 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	Two Rivers Housing website Tenant Topics Spring 2024 Compliments and complaints leaflet	We publish the full details for the Ombudsman on our website, in our complaint response letters, Tenant Topics magazine and our compliments and complaints leaflet, also via social media channels. When tenants raise a complaint, we make them aware at all stages of the complaint of their right to seek advice from the Housing Ombudsman Service.

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		Our Customer Experience team led by the Head of Customer Experience, is a dedicated specialist team. They oversee our complaints handling process and support the wider organisation to improve customer satisfaction and make service improvements based on customer feedback. The Customer Experience Business Partners work directly with Investigating Officers to oversee complaints performance and compliance to the Housing Ombudsman Complaint Handling Code. They offer guidance and support by carrying out a day 2 meeting to discuss the approach to the investigation and day 7 meeting, to check in on progress. The completion of these meetings are monitored by the Head of Customer Experience.
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		Our Customer Experience team led by the Head of Customer Experience and all complaints investigating officers have full access to staff at all levels and have autonomy to resolve complaints fully, promptly and based on what is fair, reasonable and proportionate. The Executive Team have weekly oversight of what complaints are due the following week.

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	Annual Complaints Report	Complaints are seen as a core function and as a way of tailoring, developing, and improving our services. 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. Refresher session will be delivered in 2025/2026 and we also plan to roll this out as part of induction process in 2026/2027. Our complaint investigation complaint management system includes lessons learned and actions planned to deliver improvements. 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. We have also made system improvements, which will help with capturing complaints, escalation to prompt action, and reporting on themes and trends around complaints.
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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 and Compliments Policy	Our Complaints and Compliments Policy 2026 clarifies our approach to complaints which aligns with the Ombudsman code. Raising a complaint does not affect a tenant's ongoing interactions with us. This is something that is being monitored regularly by the Member Responsible for Complaints.
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	Page 11 Complaints and Compliments Policy	In January 2026 we carried out a review of 'Early Resolutions' to provide assurance that we were working in line with the Housing Complaint Handling Ombudsman Code. Learning from the review of the concerns logged as 'early resolutions' found that the criteria was too ambiguous which could lead to inconsistencies in categorisation. We found of 14 early resolutions logged in 2025/26, we identified that 5no. of these were stage 1 complaints. Following a review, 2no. of these had already been captured as a stage 1 complaint, so 3 no. early resolutions were restated as stage 1 complaints in our 2025/26 end of year figures. As a result, we have removed Early Resolutions from our revised Complaints and Compliments Policy 2026 and approach.
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	Page 11 Complaints and Compliments Policy	We operate a 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 under our Complaints and Compliments policy and the complaint is investigated by a Two Rivers complaint investigating officer. This will continue to align to our two-stage process. Regular contractor management meetings take place with those delivering services on behalf of Two Rivers Housing to feedback on any dissatisfaction as a result of complaint findings.

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 in line with our Complaints and Compliments Policy 2026, and all complaints are handled by a Two Rivers Housing complaints investigation officer.
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	Complaints and Compliments Policy	During initial conversations with the tenant, we will seek to ensure there is a clear understanding of the reason for the complaint and the desired resolution the tenant is seeking mutually agreeing these before acknowledging the complaint. The understanding and resolution sought is set out in the acknowledgement letter. This approach is mirrored for any complaints escalated to stage 2. This is confirmed by investigating officers at the start of the complaint investigation, and in the response letter. The desired outcome/resolution is also agreed with the customer and included in the acknowledgement letter.
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		As part of the initial complaint logging or escalation process, we liaise with tenants to understand the complaint and any desired outcomes mutually agreeing these prior to acknowledging the complaint. If further clarity is needed the customer is contacted by the Customer Experience Team. 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. Where there are aspects that are not the responsibility of Two Rivers Housing, we will clarify why, and signpost to the relevant association responsible, for example the local authority for non-TRH managed land. Investigating Officers will also outline what is feasible throughout the investigation process.

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	We aim to ensure complaints are conducted by Investigating Officers who have no prior involvement in the case and will be handled fairly, objectively, and professionally always. This is confirmed in the template outcome letter at stage 2. We have recently introduced complaints being investigated by officers outside of the service area to add impartiality. This was the focus of the training for investigating managers in September and November 2025. 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 Experience and Senior Managers. These standards also form part of the training delivered to Investigating managers in September and November 2025.
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	To date in 2025/2026, 57 Stage 1 complaints were extended and 10 stage 2 were extended as agreed with the tenant. When an extension has been agreed, correspondence is provided to the complaint to confirm the new date of response. In 2025/26 we fell outside of the target time-scales in 21 instances (stage 1 and stage 2). We are taking steps to avoid further slippage. The Customer Experience Business Partners now meet with investigating officers on day 2 of allocation of the complaint and day 7. This helps maintain close oversight and provide any support needed to ensure we do not go over target time-scale for completion. Investigation Officers contact customers to discuss their complaint. At this point they arrange a follow up call to discuss the outcome of the complaint prior to sending the response (if contact has been agreed by telephone).

Section 5: The Complaint Handling Process

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		In the first instance, reasonable adjustments are captured by the customer experience team upon receiving a complaint. We have introduced a field with the new complaint case management system to update any reasonable adjustments and can report on this. Systems are also updated where any medical information or disabilities have been shared. We launched our Reasonable Adjustment Policy in September 2025 and an all-staff briefing was given at August 2025 Two Talks. In 2026 we launched the Getting to Know Our Tenants initiative. This is part of the outreach work to engage Neighbourhood Officers into communities. During these visits we ask if there are any vulnerabilities in the home. This information is then updated onto the customer's account along with any reasonable adjustments needed.
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	Page 5 Complaints and Compliments Policy	Our policy clearly states reasons why we would refuse a complaint. In 2025/26 we have refused 48 complaints. These 48 consisted of service requests, MP enquiries, legal proceedings, reports of ASB and cases being older than 12 months. We write to the tenant and clearly set out the reasons for refusal and provided the Housing Ombudsman's details. To date, none of these cases have been escalated to the HOS. 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. In 2025/26 we have not refused to escalate any complaints to stage 2. We have introduced an improved system for capturing where complaints are deferred to service requests (e.g. Reports of ASB). We started capturing this in quarter 2 and between July and September we had 18 cases that originally came into complaints but were dealt with as service requests as per our policy. In these cases, tenants were provided with the details for the Housing Ombudsman Service.

Section 5: The Complaint Handling Process

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		We have introduced the new complaints case management system (within Active H and EDRM for storing documents). This better captures the full correspondence and full complaint investigation case management (e.g. calls, emails, Tasks, repairs logs). This is timestamped, stores everything in one place and allows for improved reporting and monitoring. It also improves access of information for key services such as Customer Services so we can aim to provide excellent customer experience when a customer contacts us. We have made improvements with keeping complaints recording up to date.
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		Our Customer Experience team and Investigating Officers are fully empowered to provide suitable remedies in line with the relevant policies and procedures. 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.
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	Unacceptable Behaviour Policy	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. 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. We have had no cause to enforce this policy during 2024/2025.

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	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. We did not place any contact restrictions under the Unacceptable Behaviour policy in 2024/2025.
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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		Complaints are investigated and responded to at the earliest opportunity. We take account of reasonable adjustments /vulnerabilities in how we respond to complaints. These are being picked up and captured in the initial complaint review by Customer Experience Team and documented in the complaints handling system. We aim to try and resolve the complaint as early as possible. 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. Extensions are being monitored by the Head of Customer Experience, and a new performance indicator has been introduced for 2026/27 to improve transparency and oversight at an Executive level.
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	Page 11 Complaints and Compliments Policy	Measures are in place to track that acknowledgements are sent on time.

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	Page 11 Complaints and Compliments Policy	We aim to resolve all complaints within the timescales set out in Housing Ombudsman Complaint Handling Code. A response with a clear outcome is 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 customer and provide clear time-scales wherever possible. These are recorded in the complaint response and captured in the new complaint case management system where we can monitor follow up actions to ensure they are completed within agreed time-scales. The average life of a Stage 1 complaint is within 10 working days as outlined in the Code. There were 18 occasions where stage 1 responses fell outside of the HOS target time-scales. A complaint satisfaction transactional survey has been developed and launched. This has been built into the case management system. On closing a case, a survey is automatically sent 5 days after.
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	Complaints and Compliments Policy	Any extensions must be agreed by the Head of Customer Experience and we provide a written confirmation with a clear explanation to why an extension is required, and confirmation of the new date. We will always provide the Housing Ombudsman's details. The complaints case management system has been updated to include the only acceptable reasons for extension, as per the Housing Ombudsman's Code for Complaints Handling. This will improve our data on the rationale for extensions. A letter is sent to the customer following an extension being agreed detailing the new dates that a response to their complaint will be received and the reason for the extension. We have updated acknowledgement letters to clearly set out that there may be occasions where we may need to extend complaint investigations to help with transparency.

Section 6: Complaints Stages

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	Page 10 Complaints and Compliments Policy	All extensions are confirmed in writing and contact details for the 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		Our Investigating Officers provide written responses once the investigation stage has been completed. We always highlight in the complaint response the timescales where we expect all outstanding action will be completed. Any outstanding actions are tracked by our Customer Experience team. Once a complaint response is sent to the customer the investigating officer closes the case via the case management system. This ensures we are able to monitor that responses have been sent within the HOS time-frames. 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. We have also created an additional Customer Experience Business Partner role to support investigating officers.
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		We have provided refresher and first-time training for new investigating officers in October and November 2025 Template letters provide a clear format to follow to ensure the response addresses all the points in a complaint, reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. Customer Experience business partners are also checking every letter prior to it being sent for tone and language, and quality. Feedback is provided back to the Investigating Officer, and changes are agreed before final sign-off.

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		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 and complaint outcome. Where the Stage 1 response has been issued, or it would unreasonably delay the response, a new complaint will be registered. If the additional complaint points are not relevant to initial complaint i.e. a separate issue, a further complaint will be raised to address this new matter.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered 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		A new template letter has been developed that covers all of the points to ensure they are addressed with every complaint. The Customer Experience team review responses to ensure all criteria is reached.

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	Page 12 Complaints and Compliments Policy	If the tenant is not satisfied with the outcome of the Stage 1 investigation, they can escalate the complaint to 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. We have changed the language in our complaints leaflet and in our stage 1 response to clearly set out the actions we will take if they remain dissatisfied following Stage 1 outcome.
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	Page 12 Complaints and Compliments Policy	The Customer Experience team work with the person who has raised the complaint to understand the reason for escalating the complaint, the outstanding issues and the requested outcome. Stage 2 escalations are acknowledged within 5 working days and allocated to an Assistant Director to be investigated.
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		Where necessary, the customer experience team will contact tenants if we are not clear why a customer remains unhappy and would like to escalate. They contact within 24 hours as part of our call back service standard on receipt of the request to ensure we fully understand the tenants reasons for remaining reasons for their continued dissatisfaction and clarifying any outstanding concerns. If we are unsuccessful in contacting the tenant to clarify their reasons for explanation, we set this out in the acknowledgement letter and give the opportunity to clarify this with the investigating officer.

Section 6: Complaints Stages

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Page 12 Complaints 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. This is clearly set out in the Stage 2 acknowledgement letter and the complaint outcome letter. This is also stated in the Complaints and Compliments Policy.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Page 12 Complaints and Compliments Policy	We aim to resolve all complaints within the time-scales set out in Housing Ombudsman Complaint Handling Code. A response with a clear outcome is sent within 20 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 time-scales wherever possible. These are recorded in the complaint response and captured in the new complaint case management system where we are now able to monitor follow up actions to ensure they are completed within agreed time-scales. The average life of a Stage 2 complaint is within 20 working days as outlined in the Code. There were 3 occasions where Stage 2 responses fell outside of the Housing Ombudsman target time-scales during 2025/26.

Section 6: Complaints Stages

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	Page 12 Complaints and Compliments Policy	Any extensions must be agreed by the customer experience team, and we provide a written clear explanation to why an extension is required, and confirmation of the new date. We will always provide the Housing Ombudsman details. The complaints handling system is always updated with records of rational and conversation that took place with tenant, and letter. We are now able to easily report on extensions made. We have updated acknowledgement letters to clearly explain that there may be occasions where we may need to extend complaint investigations to help with transparency. To date in 2025/26 we have had 3 stage 2 complaints that have required extension.
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	Page 12 Complaints and Compliments Policy (old policy is superseded by new policy)	All extensions are confirmed in writing and contact details for the Ombudsman service are included in the letter.
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		Our Investigating Officers provide written responses once the investigation stage has been completed. We always highlight in the complaint response the time-scales where we expect all outstanding action will be completed. Any outstanding actions are tracked by our Customer Experience team. 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. We have also created an additional Customer Experience Business Partner role to support investigating officers.

Section 6: Complaints Stages

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		We have provided refresher and first-time training for new investigating officers in October and November 2025 Template letters provide a clear format to follow to ensure the response addresses all the points in a complaint, reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. Customer Experience Business Partners are also checking every letter prior to it being sent for tone and language, and quality. Feedback is provided back to the Investigating Officer, and changes are agreed before final sign off.
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		A new template letter has been developed that covers all the points to ensure they are addressed with every complaint. The Customer Experience 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 Customer Experience team to ensure it aligns with the code.

Section 7: Putting things right

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, 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		The Customer Experience team coordinates any contact from tenants who are dissatisfied. In line with Ombudsman guidance. 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. Our template letter addresses all these points to ensure they are addressed. It will include where the service the service failure is, lessons learned, focus on tone and apologising where we have got it wrong. This will include information on what policies and procedures have been reviewed and subsequent improvements. Even where we may not have found a service failings, we will acknowledge that tenants have felt dissatisfied and we outline where we could learn lessons to avoid this happening in future. This was a clear focus within the training for investigating officers. We are following the Housing Ombudsman Service guidance on how to apologise.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation Policy	We offer a clear definition on any awards within the Compensation Policy. Any other remedies offered will be fair, reasonable, and proportionate to the service failure considering the impact it has caused including any vulnerabilities. We are currently reviewing the compensation guidance, target date for by the end of July 2026.

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		Remedies may include an action plan agreed with the tenant setting out agreements on time-scales for example agreed appointment dates for repair works in addition to any discretionary compensatory awards. Our Customer Experience team monitor outstanding remedies via the Complaints dashboard.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation Policy	Our Compensation Policy outlines our approach to financial redress. All other forms of redress are in line with the Ombudsman's recommendations and guide on compensation.

Section 8: Self-assessment, reporting and compliance

Code Provision	Code requirement	Comply Yes/No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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	HOS Self Assessment Annual Complaints Report	The annual self-assessment evidencing compliance to the Complaint Handling Code is published on our website. Our website also houses the Complaints Performance report which includes learnings. The annual Ombudsman report is included on this page. Both the self-assessment and annual complaints report are scrutinised by the Member Responsible for Complaints and Tenant Voice Representative before review by Tenant Voice Panel. We are not compliant with meeting Housing Ombudsman Service time-frames this year. A Service Improvement Plan has been developed to improve performance in complaint handling for 2026/27.

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 annual complaint performance report is reported to the Customer Colleague and Culture Committee and Board. The group position statement is on page 3 of the 2025/26 report from our Chair, Member Responsible for Complaints and Tenant Representative.
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 was reviewed at quarter 2 and again at the end of year to ensure any changes are captured and we remain compliant with the Complaint Handling Code. We have developed 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. The Member Responsible for Complaints and Tenant Voice Representative meet with officers monthly to review complaints handling performance and to deep dive complaints to ensure ongoing compliance with the code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We are taking account of learning from recent ombudsman determinations in this self-assessment. We are sharing Housing Ombudsman determinations with the Member Responsible for Complaints as routine and identify any learning from the determinations.
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 Ombudsman Service providing updates on time-scales. There have been no scenarios of this during 2025/26.

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		We use any complaints as an opportunity for improvement even when a complaint has not been upheld. The recent training for Investigating managers included lessons learned and to assess if there is a wider impact and improve overall services, processes and procedures. Our new complaints letter templates now clearly set out lessons learned from the complaint, and our complaints handling system includes mandatory fields for completion for lessons learned. Complaints performance is regularly reviewed by the Senior Management Group and the Leadership Team. To strengthen our approach to ensure Board are gaining assurance and have the ability to listen and learn from tenant's voice we have introduced the new committee of the Board – Customer and Colleague committee. We report lessons learned for complaints on a quarterly basis to: • MRFC and the tenant voice representative • Tenant Voice Panel • Customer, Colleague and Culture Committee • Group Board The reports include themes in complaints and actions we are taking to improve services or how the insight is shaping plans and strategies. We have recently introduced a trackable action plan for improvement actions. In the new Complaints and Compliments Policy 2026 we have added a new section called 'Putting Things Right' to ensure learning lessons forms part of our approach and to evidence our commitment to Learning from complaints. This also aligns with the Code.

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	We see complaints as nuggets of gold. We hold briefings at Two Talks where we have set out the high value complaints bring to help improve our services to our tenants. This is supported by our customer experience team who take a lead on reviewing complaints, assess trends and lessons learned. We can demonstrate learning from complaints has led to service improvements as a result. This has been set out in our quarterly lessons learned reports. These are shared with the MRC, Tenants Voice, CCC and Board. Findings form a key part of our continuous improvement and training programme for both team members and contractors. This is an area we will continue to strengthen. The customer experience team play a vital role in supporting heads of service and assistant directors to review and capture lessons learned and action to improve services. The Customer Experience team have oversight of all complaints. This will allow wider issues to be identified outside of the individual complaint or circumstance and assessing future impacts. The Head of Customer Services regularly shares information with the Senior Management Team, continuing to strengthen our complaints culture. Each member of the Customer Experience team is registered with the HOS Learning Hub and regularly attend webinars to learn from others in the sector and hear examples of good practice in complaint handling.
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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 (2025-2026 version will be published on our website when available.) Tenants Topics (Summer 2024) Tenants Voice Agenda (July 2024)	We recognise and encourage a positive complaint handling culture. We include wider learning in our Annual Report and Tenant Topics magazine. Regular reports are provided to our Tenant Voice group including themes, and lessons learned. This group also has Two Rivers Housing Board Members and the Member Responsible for Complaints, providing direct access to complaint feedback from Tenant Voice and learnings directly into the Board. Lessons learned from complaints is included in our annual review of complaints 2025/26. This will be publicised on our website, social media and in our Tenant Topics publication to all tenants.
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Section 9: Scrutiny and oversight: continuous learning and improvement

9.4	We recognise and encourage a positive complaint handling culture. We include wider leaning in our Annual Report and quarterly Tenant Topics magazine. Feedback has been provided to our Tenant Voice group including themes and learning at a Customer Experience workshop. 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. 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. 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.	Yes	Complaints and Compliments Policy	The Head of Customer Experience is accountable for complaint handling and leads the Customer Experience team. This post was filled in December 2025. Themes and risks are assessed and tracked by the Customer Experience Team as continuous improvements. To further improve on this, we have added significant changes to our complaints management system, allowing greater visibility. A secondary Customer Experience Business Partner role has been created due to the importance of supporting the work around customer insights and lessons learned. Any serious risk or potential systemic issue are registered with the Executive team and monitored until assurance has been provided that the risk no longer remains.
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).

Section 9: Scrutiny and oversight: continuous learning and improvement

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 monthly with the Executive Director of People and Neighbours and the Customer Experience Team We have a developed a role profile for the role setting out a clear set of responsibilities for the MRC, an annual work plan, monthly meetings which are minute and action arising logs. A representative from Tenant Voice also attends the meetings to assess performance and progress on complaints and provide constructive challenge. The MRFC provides a report to every Customer, Colleague and Culture Committee to provide assurance, highlight risks, areas for improvement and good practice.
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Section 9: Scrutiny and oversight: continuous learning and improvement

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 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	As per 9.6, the MRC meets monthly with the Exec Director of People and Neighbourhoods and the customer experience team, and a lead from our Tenants' Voice scrutiny panel to assess performance and progress on complaints. An annual work plan and standard agenda have been agreed including performance reporting, learnings, reviewing Ombudsman determinations, compliments plus TSM results and the link to complaints. The MRC also carries out sample deep dives to check quality of complaints handling and assurance checks that we are compliant with the Code. The MRC has developed a set criteria which is used to assess the quality of complaint investigations and responses. The MRC will feed this information into the Customer, Colleagues and Culture committee and ultimately into the Two Rivers Housing board. Executive Directors and Assistant Directors have monthly key complaints performance information and summaries of issues; this information is shared with the MRC. These are subsequently presented to the Two Rivers Housing Board. All learning and outcomes from HOS determinations findings are shared with MRFC. During 2025/26 there were 5 determinations with 10 findings to date in 2025/26. All orders were completed on time. Our current maladministration rate is 40% compared to 70% in 2024/25 which is below the sector average.
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Section 9: Scrutiny and oversight: continuous learning and improvement

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and 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.	Yes	We embrace a listening and learning culture and this is reinforced through our objectives in our corporate plan, Customer Experience Strategy and People Strategy. We can demonstrate some direct impact on service improvement across services because of themes from complaints; e.g. grounds Maintenance, Anti Social Behaviour, Repairs and Neighbourhood Management. Following some changes in the Customer Experience team we reintroduced sharing of complaint performance and lessons learned with Senior Management Group (Heads of service) in October 2025. Here, we discuss as part of collaborative working across departments to ensure it remains a key focus for our organisation. 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. All feedback is constructive with a view to looking across the wider organisation. As we have expanded the pool of investigation officers, this has meant that investigation managers investigate complaints outside of their own service area. This has strengthened collaboration and learning of the business and our systems across the organisation. Instances of underperformance in complaint handling is managed through one to ones.
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