

## Introduction

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1. Focusing particularly on our Corporate Values of Customer First, Listen, Act & Learn and Together, this report provides the annual review of the Complaints Service, detailing what has changed, what we have learnt, how we are responding to lessons learnt and the trends and themes that have arisen with the detail regarding how these are being addressed.

## Updates

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2. In June 2023, we held the first meeting of our Customer Complaint Panel, as overseen by our Customer Engagement Team. The panel reviewed two cases that had been investigated to stage 2 of our process, against a set of criteria linked to our corporate values. The panel focused on the quality of the investigation and response, any outcomes and follow on works and whether the complaint was handled in line with the Housing Ombudsman Complaint Handling Code and our own LHP Complaints Policy.
3. A second meeting of the panel was held in October 2023 and all feedback on the cases has been shared with the teams responsible as part of the monthly review meetings. The goal for this group was to be able to offer their review as part of the next options available to our customers once they have exhausted our process, alongside that of any service offered by the Housing Ombudsman Service. With further training we had hoped to go live with this option by the end of Q3.
4. A third panel meeting took place in January 2024. The panel had increased in number to 6 engaged customers. A review of possible outcomes of the new complaint handling code was shared to expand the panels knowledge of the Codes influence. The panel then reviewed our stage 2 complaints process with new cases and offered helpful insight and discussion with a recommendation regarding how we inform customers of recharges on their account.
5. The Customer Experience Manager is a part of a customer experience/complaints networking group that shares queries and best practice across the sector. The investigation template report that was created by the customer experience manager has been adopted as a starting template for MHS Homes Group, Beyond Housing and Believe Housing.
6. Believe Housing are also in discussion with the customer experience manager on LHP's delivery of complaints training in house to seek support and advice on how to adopt a similar approach.
7. Monthly complaint review meetings have been integral to the understanding of learning from complaints and to drive improvement on the quality of investigations and responses. Meetings include CLT and Managers from across the customer and property services directorates and have led to improvements on the investigation template to promote greater use of "together" working.

8. Investigating officer training for all colleagues who will investigate or contribute to the investigation of a complaint took place over Q2 with 78 colleagues attending over 6 sessions delivered by the Customer Experience Manager and the Talent and Acquisitions Manager. The sessions focused on improvements to the process to ensure accountability on follow on actions from complaints and improving the quality of written responses.
9. In Q3 the Risk and Assurance Team completed a mystery shopping review on complaints. They found 100% compliance with MGI principles on complaint calls by the Customer Experience Team. Recommendations included amending the investigation report template and letter templates to ensure they captured all complaint information and to increase quality of complaint responses.
10. In response to these recommendations the Customer Experience Manager arranged letter writing training through the Housing Quality Network. Colleagues responsible for investigating and responding to complaints attended across two sessions, with excellent engagement and feedback.
11. All complaint response letter templates have now been reviewed to ensure they are more concise, use plain English and prioritise the important information for the customer. This has resulted in a more 'human' and empathetic tone which speaks to the ethos of the Code.
12. The Housing Ombudsman Service published an update to their Complaint Handling Code in February 2024. This was reviewed by the Customer Experience Manager, with a completed gap analysis for changes to policy and process shared with the Operations Committee to offer assurance. The Code is now a statutory requirement for member landlords and came into effect on 1 April 2024.
13. The LHP Complaints Policy and process has been updated to reflect these changes, and this was approved by the Board in March 2024. The complaints webpage has been updated as well as our template letters, reports and internal logging systems and reporting.
14. The changes to the Code have influenced how our Complaint Panel will conduct their reviews going forward. The Panel will now focus on performance on complaints with emphasis on themes, trends, and learning. The Panel will then be provided feedback to customers via the customer magazine, the LHP website and Your Voice.

## Trends and Themes

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15. When complaints are received and logged through QL, they are assigned a type to ensure that trends and themes can be analysed at each monthly reporting stage.
16. Trends and themes are reported to CLT and ELT as well as being utilised in the monthly complaint review meetings to highlight any areas for improvement.
17. They will be used to report areas of learning to customers in the magazines and going forward in our annual report and on our website through recommendation of the KPMG audit report and a reporting requirement of the Code.
18. The top three themes from the past year are:
  - **44.67% Quality of service** – this is where there may be multiple issues such as lack of communication, progress, issues/repairs not resolved at first attempt etc.
  - **29.79% Lack of progress** – where works/issues have been reported but nothing has happened to resolve.
  - **7.61% Lack of communication** – although a lower percentage than above, customers routinely cite this as a part of their complaint in terms of no phone calls returned or lack of updates and follow on.
19. One of the main issues of complaint is where customers have not been informed of repairs appointments or follow on works. This has been addressed through the introduction of the planning team to the Customer Service Centre (CSC), with appointments being made at first point of contact.

## Learning

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20. All learning outcomes are added to Pentana, our performance software and tracked until they are delivered in the same way as Internal Audit Actions are monitored.
21. An audit of our pest control process found issues with the delivery of the service by our current contractor. This was having a negative impact on satisfaction with this service by customers. A working group was formed, and this process has now been updated to reflect the feedback received from customers as well as undertaking a procurement process to obtain a new contractor.
22. Following recent complaint feedback, a working group has been formed to review the new build rental/shared ownership process to look at improvements to how customers are communicated with in the first month of tenure/ownership to address any defects within the property. These will now be logged through QL to allow greater scrutiny of developer performance in resolving issues.

## Performance

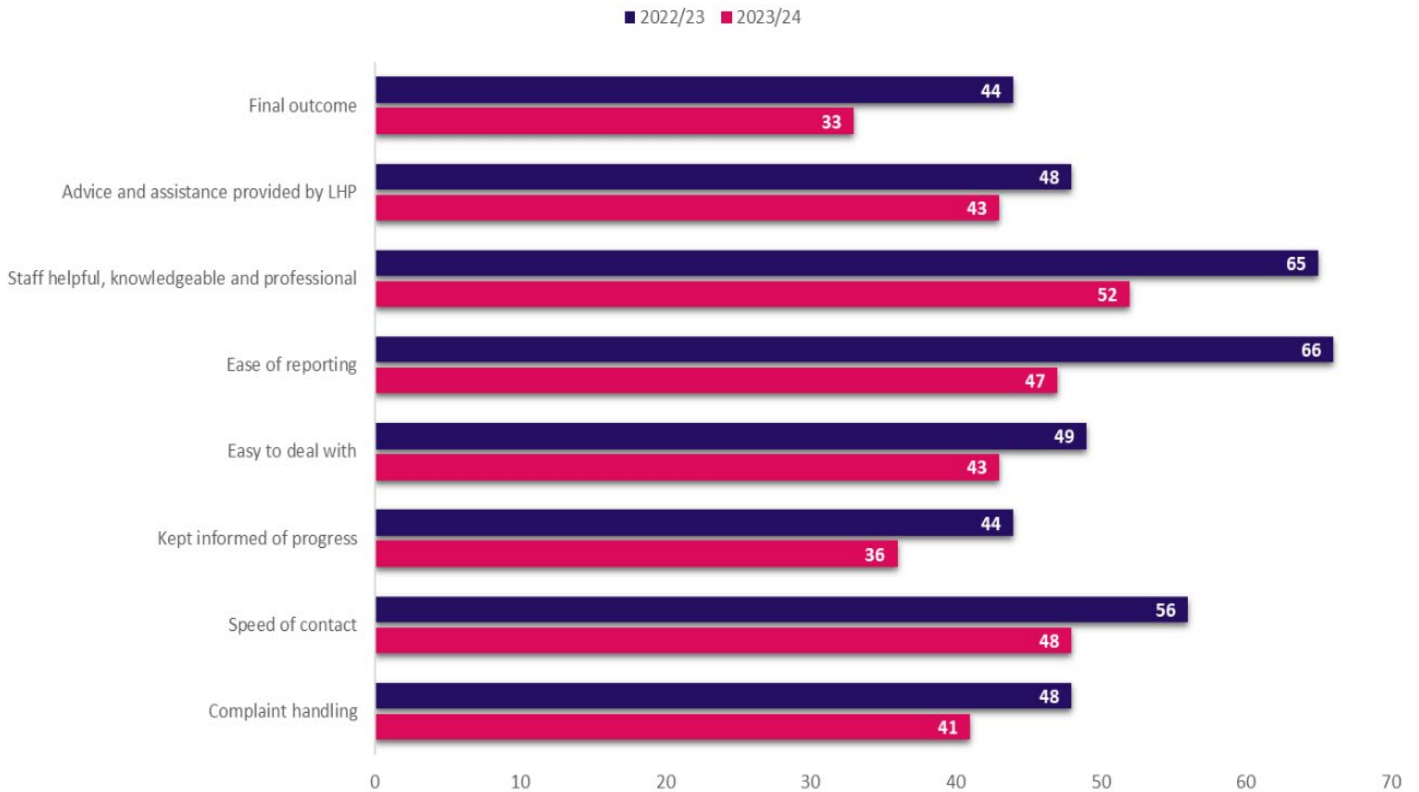
	Target	Q4 2022/23	Target	Q4 2023/24
<b>Total Complaints received</b>	95	127	This target has been replaced by Complaints per 1000 properties (3.83)	3.72 (88 complaints)
<b>% responded in target</b>	95	95.2	98.6	98.8
<b>Average days to respond</b>	10	10.2	10	11.5
<b>Satisfaction – handling</b>	74.3%	45%	65.6%	20%
<b>Satisfaction - outcome</b>	64.8%	40%	63.4%	16.67%

23. There has been a significant decrease in the number of complaints received in the same period for 2023.
24. There has been greater emphasis on aiming to resolve issues raised by customers at first point of contact, which has contributed to the decrease in formal complaints being received.
25. Going forward these types of service request complaints will be logged on QL to allow for reporting and analysis for lesson learned. This is in line with the new Code.

	LHP 23/24	Housemark Median
<b>Handling Satisfaction</b>	40.70%	51.2%
<b>Outcome Satisfaction</b>	33.33%	47.5%

26. Customer satisfaction on complaint handling and outcome remain disappointing despite work to drive improvements. Customer surveys were piloted for incentive over Q2 to increase response rates, however numbers remained like Q1. For context it is important to note LHP's position against the sector as per Housemark figures for complaints satisfaction. The above Housemark Median is from Q2 as they have not yet updated for year end, so this may not be reflective of the wider sector.
27. Satisfaction scores for 23/24 against key complaints surveying metrics for comparison with 22/23 can be seen below.

## Annual Comparison of Complaints Satisfaction (%) 2022/23 vs 2023/24



### Trend Analysis

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#### Disability

28. Customers who have indicated they are disabled average satisfaction was higher than that of non-disabled customers, seeing a 32% difference in satisfaction of complaint handling and 49% difference for complaint outcome. The largest disparity across other questions on the survey was relating to the assistance and advice given by LHP colleagues, with the 23/24 average score for non-disabled satisfaction being 26% and disabled customer 70%, a 44% difference.

#### Gender

29. On average male customers scored 57% for advice and assistance offered by LHP in relation to their complaint compared to female customers who scored 44% - a difference of 13%.

### Ombudsman Determinations

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30. The Housing Ombudsman Service (HOS) decide which complaints qualify to be investigated as a case by them. Below are determinations have received from the Ombudsman in 2023/23:

Determination Date	Investigation remit	Outcome	Orders	Comment
March 2024	Landlord handling of anti-social behaviour report (ASB)	In accordance with paragraph 52 of the Housing Ombudsman Scheme, there was service failure in respect of the landlords handling of the customers' report of anti-social behaviour.	The landlord to write to resident within four weeks with apology for its failure to call them back in August and to follow its policy in full in August 2020.	Letter of apology sent to former resident within four-week deadline. Copy provided to the HOS as evidence of compliance of case determination.
May 2023	Landlords handling of customers reports of animal cruelty by neighbour.  Landlord decision not to open an ASB case regarding neighbours' behaviour.  Landlords handling of allegations of staff misconduct.  Landlord complaint handling.	In accordance with paragraph 52 of the HOS, there has been no maladministration with regards to not opening an ASB case.  In accordance with paragraph 52 of the HOS, there was no maladministration of mishandling allegations of staff misconduct.  In accordance with paragraph 53(b) of the HOS, the landlord has made reasonable offer of redress in relation to complaint handling prior to investigation, which in the Ombudsman's opinion, resolves the complaint satisfactorily.	None	None
Jan 2024	Landlords handling of customers Preserved Right to Buy application.	In accordance with paragraph 52 of the HOS, there was no maladministration by the landlord in its handling of the customers Preserved Right to Buy application.	RECOMMENDATION – to re-offer compensation previously rejected by the complainant in previous complaint responses.	Compensation was re-offered and accepted by complainant. HOS informed of this outcome to show compliance with their recommendation.
July 2023	Response to customers claim that property did not meet their disability needs when let.  Handling of resident's request for adaptation works and repairs.  Complaint handling.	In accordance with paragraph 52 of the HOS, there was maladministration in relation to landlords handling of adaptation requests and complaint handling.  There was no maladministration in	Write to resident to apologise and pay direct compensation to the sum of £1100 within 4 weeks.  Inspect rear doors and carry out repair or replacement.  Update complaint letter to include details of how	Apology letter and compensation payment sent to customer within 4 weeks of determination.  Doors had already been inspected ahead of the determination with them being manufactured and

		landlords' response that the property did not meet the customers disability needs upon being let.	to escalate complaint to the HOS.  Provide complaint training to frontline staff.	fitted following determination.  Complaint letters were already reviewed and amended during annual review before determination was received.  Complains training had already taken place ahead of determination being received.  All evidenced to HOS in compliance with the determination.
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### Learning from Complaints

31. The complaints process is used as a tool to inform where learning and service improvements can be made. Below are learning points that have come from complaint investigation and scrutiny by the customer complaint panel:

Complaint	Learning	Comment
Customer states they were not informed of credit on rent account being used to cover repairs recharge arrears.	Although there were notes on system supporting that this had verbally been discussed, the complaint panel identified it would be advantageous to have formal notification.	Income Manager added formal letter notice for use of credit for arrears as per policy, to the process.
Customer not informed of property being added to roofing programme following report of repair.	Ensuring customers are informed of programme and kept updated to ensure no further repair issues until replacement.	Updates made to the Component Replacement Request (CRR) process to include lead responsible for informing customers. This is discussed at each CRR meeting.
Customer not informed of cancelled and re-arranged appointment.	Ensure clear process for ownership of communication of cancelled/re-arranged appointments.	Comprehensive email reminder to all Planning Team on responsibility of updating customers on appointment changes.

## **Conclusion**

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32. Through consistent review and challenge we believe that we can continue to improve our customers' experience and achieve improved satisfaction responses.
33. Customer Experience Team will continue to manage the complaints process and support, develop and guide colleagues across the business to influence a customer first service.

## **Recommendations**

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34. The Committee is asked to approve the Complaints Handling Code Self-Assessment and recommend to Board for approval.
35. The Committee is asked to consider and issue a response to the report which will be shared with customers and the Housing Ombudsman Service as part of their code compliance framework.



## Appendix A: Self-assessment form

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

Once approved, landlords must publish the self-assessment as part of the annual complaint's 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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced through quality audit of customer service calls, whereby advisors inform customers of the LHP complaints process and how they can assist.	N/A
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	Yes	Service request process introduced.	Flow charts provided by the Housing Ombudsman Service have been shared as part of this process. Service requests are logged on systems to capture any learning opportunities.

	recorded, monitored, and reviewed regularly.			
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	Evidenced through quality audit of customer service calls, whereby advisors inform customers of the LHP complaints process and how they can assist.	Service requests that have also escalated or been logged as complaints will be reported on a quarterly basis to senior leadership.
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	Surveying partner, Acuity, email 'flags' of comments or feedback provided during survey that could be actionable by LHP. These are reviewed and actioned by the Customer Experience Manager and updates provided to the performance team on outcomes.	N/A

## 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	Reasons for exclusion provided in the LHP complaints policy. Refusal letter templates providing information on reasons and where customers can seek further support or advice.	Each complaint is reviewed by the Customer Experience Team to ensure details provided by the customer fall within the complaint remit.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul>	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A

	<ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	
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	Template refusal letter sets out next steps for customer and Ombudsman details.	Any instruction from the Ombudsman is emailed to the customer experience team and reviewed by the customer experience manager for action.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Reasons for exclusion provided in the LHP complaints policy. Refusal letter templates providing information on reasons and where customers can seek further support or advice.	Each complaint is reviewed by the Customer Experience Team to ensure details provided by the customer fall within the complaint remit.

### 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 are received via telephone, email, web form, the MyLHP app, social media, in writing or in person.	LHP accepts complaints via any of its communication methods with customers.  If translation services are required, LHP will provide these to ensure no customer is disadvantaged to accessing the service.
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	All LHP staff are trained on the complaints process upon induction to the business.	N/A
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	Monthly and Quarterly complaints report to senior leadership, Committees, and the Board.	Complaints analysis of numbers, trends and themes are reported regularly to offer insight and learning to improve services.

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	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024. Policy has been updated on the LHP website March 2024.	N/A
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	will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.			
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Complaint acknowledgement and response letters.  Website	All complaint acknowledgement and response letters include Ombudsman details as standard.  The LHP website has information specific to the Ombudsman's role and how customers can make contact.



## 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	Customer experience team comprising of customer experience manager and customer experience administrator to manage the complaints process and reporting.	N/A
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	As specified in the customer experience manager job description.	N/A
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	Complaints training as standard part of employee induction process.  Investigating officers training for all staff with responsibility of investigating and responding to complaints.	N/A

## 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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	There is only a 2-stage complaint process as per the instruction of the code.  A separate process captures any service requests.
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	There is only a 2-stage complaint process as per the instruction of the code.  A separate process captures any service requests.
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	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template letters support employees to identify and respond appropriately.	N/A
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind.</li> <li>b. give the resident a fair chance to set out their position.</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> </ul>	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Covered in any complaints training.	N/A

	d. considers all relevant information and evidence carefully.			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Covered in complaints training for all investigating officers.	Prompts within the investigation report templates for any extension remind officers of this.  Dedicated extension letter templates are sent outlining the reasons for the delay and when the customer can expect a response.
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Evidenced within the Reasonable Adjustments Policy.  EDI sought from all complainants via Customer Contact Centre.	Customer accounts are updated with any new or changing disabilities or vulnerabilities to ensure wider business has information.

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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	Reasons for refusals are listed within the policy, but each case is reviewed on its own merit.
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	Yes	QL Housing Management System.  Sharepoint complaint folders for letters and investigation reports.	N/A

	any relevant supporting documentation such as reports or surveys.			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	Advice, support, and assistance is offered from customer experience team to all investigating officers, seeking approval from senior management where necessary to ensure resolution can be found.
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	Evidenced within the Limited Contact Policy.	Reported to senior management and the Board when enacted.
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	Evidenced within the Limited Contact Policy.	Working group of relevant managers and colleagues instructed when reviewing appropriate action to ensure any reasonable adjustments have been sought ahead of action.

## 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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  New service request process.	Service request is used where issue can be resolved swiftly, with apology. Customers can still choose to have their complaint investigated at stage 1.  Service requests logged to capture any learning.
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within ten working days</u></b> of the complaint being acknowledged.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024. Prompt included in investigation report template and action outcome on QL case.	N/A

	of the expected timescale for response. Any extension must be no more than ten working days without good reason, and the reason(s) must be clearly explained to the resident.			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template extension letter.	Extension letters include contact details of the Ombudsman as standard.
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Follow on action case to track outstanding actions.	Follow on actions are linked to complaint case for audit trail and are reported daily to the business.
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template response letter has prompts to include all parts of the complaint and to provide clear outcome.	Letters are quality checked by the customer experience team to ensure all information is present, correct and meets MGI principles.



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	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stages.</li> <li>b. the complaint definition.</li> <li>c. the decision on the complaint.</li> <li>d. the reasons for any decisions made.</li> <li>e. the details of any remedy offered to put things right.</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template response letters and prompts in template investigation report.	N/A

### 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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A

	within five working days of the escalation request being received.			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	Template investigation report informs officer to make contact with the customer to discuss how complaint can be resolved at stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Prompt within investigation report and as action outcome on QL.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template extension letter	Ombudsman details are included in the extension letter template as standard.

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Follow on action case to track outstanding actions.	Follow on actions are linked to complaint case for audit trail and are reported daily to the business.
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	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.			
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template response letter has prompts to include all parts of the complaint and to provide clear outcome.	Letters are quality checked by the customer experience team to ensure all information is present, correct and meets MGI principles.
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 stages. 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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.  Template response letters and prompts in template investigation report.	N/A

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Investigation report template	Dedicated section for outlining who should be involved in the investigation and resolution of the complaint to assist the lead investigating officer.
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## 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.</p> <p>These can include:</p> <ul style="list-style-type: none"> <li>• Apologising.</li> <li>• Acknowledging where things have gone wrong.</li> <li>• Providing an explanation, assistance, or reasons.</li> <li>• Taking action if there has been delay.</li> <li>• Reconsidering or changing a decision.</li> <li>• Amending a record or adding a correction or addendum.</li> <li>• Providing a financial remedy.</li> <li>• Changing policies, procedures, or practices.</li> </ul>	Yes	<p>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Standard part of the complaints training and investigating officers training.</p> <p>Included as prompts within the investigation report template.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Evidenced in the Compensation Policy.</p> <p>Housing Ombudsman Remedies Guide used to inform.</p>	N/A

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	Complaint response letters. Included in complaints training and investigating officers training.	Follow on actions are logged through QL and monitored on daily report.
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7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Ombudsman website and remedies guide used as support for decision making.  These are referenced in the Compensation Policy.	N/A
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**Section 8: Putting things right.**

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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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.</li> <li>c. any findings of non-compliance with this Code by the Ombudsman.</li> <li>d. the service improvements made as a result of the learning from complaints.</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Annual Complaint report to the Board.	N/A

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	LHP website – dedicated complaints page.	N/A
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A
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	Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.	N/A

**Section 9: Scrutiny & 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>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Prompt within the investigation template to consider learning/service improvement.</p> <p>Covered in complaint training and investigating officers training.</p>	N/A
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>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Covered in complaint training and investigating officers training.</p> <p>Regular updates on complaints on LHP BaseCamp for colleagues.</p> <p>Regular complaint updates and reports to senior leadership.</p>	N/A

9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff, and relevant committees.	Yes	<p>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Reported to the Customer Complaint Panel.</p> <p>Reported in monthly and quarterly reports to senior leadership.</p> <p>Shared via BaseCamp news updates.</p> <p>Included in customer magazine and YourVoice.</p>	N/A
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<p>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Head of Customers is the senior lead person.</p>	To meet on a quarterly basis with customer experience manager and member responsible for complaints.

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	Board member and Chair of operations committee is currently assigned this role.	N/A
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	Quarterly reports to operations committee and the Board.  Shadowing sessions with the customer experience manager.	24/25 will introduce quarterly meets with senior lead, customer experience manager and MRC.
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	Yes	Quarterly reports to operations committee and the Board.	N/A

	d. annual complaints performance and service improvement report.			
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>Evidenced within the LHP Complaints Policy approved by the LHP Board in March 2024.</p> <p>Dedicated complaints BaseCamp page with regular complaint updates on learning and trends/themes.</p> <p>Complaint training for all new employees and investigating officers.</p>	Complaint training covers the code but aligning with LHP values to ensure a positive and proactive complaints culture.

