

# RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

## Section 1 – Definition of a complaint

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Our complaints policy details that we define a complaint as an expression of dissatisfaction however made, about the standard of service, actions or lack of action by RHP, our colleagues, or those acting on our behalf, affecting a customer or group of customers.  Our complaints policy can be found on our website: - <a href="#">What is RHP's Complaints Policy? - RHP</a>
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	Our Customer Advisers are trained to resolve our customer’s expressions of dissatisfaction at the first point of contact setting out what we’re going to do, to put things right. However, if this isn’t possible or our customer is not happy with the outcome or our approach, we will raise a formal complaint. The policy is aimed at all existing RHP customers, or anyone directly impacted by the services we provide. We accept complaints on behalf of our customers through anyone that has their permission.
1.6	If further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our Customer Advisers are trained to resolve our customers expression of dissatisfaction at the first point of contact setting out what we’re going to do to put things right. However, if this isn’t possible or our customer is not happy with the outcome or our approach, we will raise a formal complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our complaints policy details the circumstances where we will not accept a complaint.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Our complaints policy clearly details the circumstances where we will not accept a complaint.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	There will be some instances where we won’t accept a complaint for investigation, these are captured in our complaints policy. If we do not choose to accept a complaint, we will clearly set out the reasons why, and signpost the customer to the Housing Ombudsman Service for further advice or support. Please see section titled ‘when will we not accept a complaint’ in our policy for further details.

## Best Practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanation
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Our complaint definition in our policy details what we consider to be a complaint when our customer is unhappy with a service they have/have not received. This can be found under the heading ‘relevance’.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	We provide our customers with details on how to raise a complaint at the end of each transactional survey.

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

### Section 2 – Accessibility and awareness

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Housing Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	RHP offer customers the opportunity to log a complaint with us via the phone, email, face to face, Facebook, letter, webchat and via our website. This is detailed under 'The Process' section in our complaints policy.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our complaints policy clearly details the number of stages involved in our process, what will happen at each stage, and the timeframes for responding so it's accessible for our customers. Our policy can be found on our website, we can send a copy to our customers via email, and also send a copy in the post. We will always make reasonable adjustments to support our customers with accessing our complaints policy where required.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Our website includes information on how to raise a complaint and ensures our complaint policy and process is visible so our customers can easily access this information. Please see link - <a href="https://www.rhp.org.uk/news/our-complaints-process/">https://www.rhp.org.uk/news/our-complaints-process/</a>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Our complaints policy has a section called 'reasonable adjustments' which details how we support our vulnerable customers, and in compliance with the Equality Act 2010. Our Complaint handlers have been trained to appropriately identify where reasonable adjustments may be needed, to effectively support our customers.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	As well as being publicised online, we sent a leaflet to all of our customers in December 2022 setting out how they can contact us in relation to making a complaint. We will include this within our next communicate with our customers at the end of 2023 beginning of 2023. This information is also publicised within our transactional surveys and complaint acknowledgment and responses and details on how to contact the Ombudsman Service are included.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We sent a leaflet to all customer in December 2022 setting out how they contact us about complaints. When we next provide this to our customers at the end of 2023 beginning of 2024we will include this information and our website also details this. <a href="https://www.rhp.org.uk/news/our-complaints-process/">https://www.rhp.org.uk/news/our-complaints-process/</a>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	When we acknowledge our customer's complaint, we will confirm that should they wish to, they contact the Housing Ombudsman Service throughout their complaint and not once our complaints

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

			process is exhausted. We will also provide details in relation to how contact can be made to the service.
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### Best Practice 'should' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, Commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	We accept complaints from customers across all customer channels, this includes our social media accounts, Facebook and Twitter. These are captured and administered in in line with our complaints policy. We will however ask that customers private or direct message us to protect the anonymity of others involved, where appropriate. This is detailed in or complaints policy under section 'Social Media Complaints'.

## Section 2 – Complaint Handling Personnel

### Mandatory 'must' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	We have a dedicated Complaints team who investigate complaints and ensure a satisfactory resolution is provided to our customers in line with our complaints policy.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our complaints team have received appropriate complaints training which enables our complaint handlers to have a full understanding of our complaints policy. We will always ensure that the complaint handler has no conflict of interest in relation to the complaint's their handling.

### Best practice 'should' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• Be able to act sensitively and fairly</li> <li>• Be trained to handle complaints and deal with distressed and upset residents</li> <li>• Have access to staff at all levels to facilitate quick resolutions of complaints.</li> <li>• Have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>Our complaint handlers have been provided with training and are committed to always handling complaints fairly and sensitively in order to support our customers who may feel upset and distressed throughout the complaints process. The team last had refresher training in June 2023 and will receive further refresher training on 10<sup>th</sup> November 2023 as a result of this self assessment. All staff at RHP undergo training of our internal 'Stellar Standards' which sets out what we expect in delivering a great service to our customers.</p> <p>Our complaints team have the commitment from our teams across the organisation to resolve our customers complaints quickly and fairly, and all teams understand the importance of this to fulfil a good complaint experience for our customers.</p>

# RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

## Section 4 –Complaint handling principles

### Mandatory ‘must’ requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord’s audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident’s concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘pre-complaint stage’) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	<p>We understand the importance of agreeing a resolution with our customer and will always ensure we discuss our customers desired outcome with them before we provide our complaint response.</p> <p>To demonstrate the above, we will always ensure there is good record keeping on the complaint case and that any agreed decisions with our customer or conversations are logged on the customer’s complaint case. We will always ensure that access to our complaints policy is not obstructed which could also incur delays for our customer.</p> <p>We have a two-tier complaint process and investigate complaints at stage one and stage two, which is our appeal stage. We believe this process provides us and our customers with sufficient opportunity to resolve their complaint satisfactorily.</p> <p>Our stage one complaints are acknowledged and logged withing five days of receipt.</p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	<p>Within our complaint acknowledgement, we ensure we set out our understanding of the complaint and the outcome our customer is seeking.</p> <p>If any aspect of our customers complaint is unclear, we will ask for clarification and agree the full definition with our customer before we investigate and respond.</p>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	<p>We understand the importance to investigate our customers complaints in an impartial manner and will always ensure our customers complaint is investigated fairly.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<p>Our Complaint Advisors have received appropriate complaint training and will always ensure they investigate complaints on their own merits, act independently and have an open mind, take measures to address any actual or perceived conflict of interest, consider all information and evidence carefully and will always keep the complaint confidential as far as possible.</p> <p>If our Complaint Advisors require support with any of the above, our Complaint Manager will support them with this.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>We understand the importance of identifying with our customers where reasonable adjustments may be necessary to support our customers. We will work with our customer to ensure any agreed reasonable adjustments are fulfilled and they are supported as best we can.</p>
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:	Yes	<p>We will always ensure that our customer and where applicable, a member of our staff who is the subject of the complaint, will be given a</p>

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

	<ul style="list-style-type: none"> <li>• set out their position.</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>		<p>fair chance to set out their position and comment on any adverse findings before a final complaint decision is made.</p> <p>We recognise the importance of a fair and impartial investigation and are dedicated to ensuring that every complaint is approached in this manner.</p> <p>Complaints relating to an RHP employee's conduct will be fully investigated in line with our HR policies, but we cannot divulge the outcome of these investigations for reasons of confidentiality.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes	<p>Our complaints policy details we need to receive a complaint within 6 months of the problem occurring. We will always review any request outside of this timeframe and discretion may be applied. If it does fall outside of this time we may decide, after understanding the customer's personal circumstances, to investigate.</p> <p>Our customers should respond to their stage 1 complaint within 6 months of us issuing our formal reply. A reasonable adjustment to this approach may be considered depending on the customer's personal circumstances.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	<p>We will not unreasonably refuse to escalate a complaint throughout all stages of our complaints process. If we decline to escalate a stage one complaint, we will provide a clear and valid reason for this outcome.</p> <p>We would not escalate a complaint if we are taking or defending legal action and it could impact the ongoing proceedings. The reasons are listed within our complaints policy.</p>
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	<p>All complaint records are logged and stored on our housing management system. The complaint case on our system will include all information in relation to the complaint to include the steps taken in the investigation, conversations with our customer and any other relevant party. The outcome of the complaint and any associated documents will be stored on the case file.</p>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	<p>Our complaints Policy has a section titled 'unreasonable or vexatious complainants' which details how we manage and handle unacceptable behaviours from our customers and their representatives when handling their complaint.</p>

### Best practice 'should' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	<p>We understand the importance of managing our customers' expectations from the outset. When a desired outcome is unreasonable or unrealistic, we will always ensure we provide a detailed explanation as to how a decision has been made to ensure clear communication.</p>

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	<p>We will always complete a thorough investigation in relation our customers complaint and our Complaint Advisors will always aim to resolve a complaint at the earliest opportunity once they've assessed the evidence required and actioned any urgent concerns.</p> <p>We will always call our customer to discuss their complaint whilst investigating to ensure their issues are fully considered.</p>
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	<p>We support our customers who would like the opportunity to have a representative support or deal with their complaint and welcome them to any meetings or conversations where reasonable.</p> <p>Our complaint policy under section 'who can complain' details that we accept complaints on behalf of our customers through anyone that has their permission. We will request that a third-party authority form is completed before we're able to discuss our customers complaint with the representative. This protects our customers personal information and is in line with GDPR regulations.</p>
4.8	Where a key issue of a complaint relates to the parties legal obligations, landlords should clearly set out their understanding of the obligations of both parties.	Yes	<p>We will always clearly set out our understanding of our legal obligations as the landlord and our customers obligations as either our tenant, homeowner or our shared owners. We recognise the importance of ensuring clear communication when responding to these types of requests.</p>
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<p>When communicating with our customers, we will not generally identify individual members of staff or contractors unless we deem it appropriate to our investigation.</p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	<p>We understand the importance of communication with our customers and will ensure our customers are kept regularly updated in relation to the progress of their complaint investigation.</p>
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>We encourage our customers to provide us with feedback in relation to our complaint handling so we can make positive improvements where necessary and learn from our complaints to improve our service.</p> <p>We provide a link to our complaint handling survey at the bottom of our letter or email within our stage one and stage two response for our customers to complete so we can capture this. A copy of this survey can also be sent in paper format if requested by our customer. We also use feedback from our TSM surveys around complaints handling to capture customer feedback.</p> <p>Feedback from customers is reported to our Executive Group and our Service Delivery Transformation Committee through our 'Voice of Customer' report and Complaints Performance Report.</p>

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	We believe that our customers complaints provide us with an opportunity to review and shape the services we provide to them so we can continually improve the the service we deliver. We're committed to learning from our complaints and our Complaint Advisors are supported to ensure they are engaged in this process. We hold a monthly Complaints Meeting with attendance from our leadership team to review and track customer feedback and lessons learnt. These are also reported and tracked through our Service Delivery Transformation Committee.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	When placing a warning on our customer's account, we will take into account any known vulnerabilities.

### Section 5 - Complaint stages

#### Mandatory 'must' requirements Stage 1

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b>within 10 working days</b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	We always aim to respond to our customers complaint within ten working days following the complaint being logged and our acknowledgment provided to our customer.  Where we require an extension of time to respond to the complaint, this will not exceed a further 10 working days without good reason and we will always provide a good and detailed reason for the required extension of time to respond the complaint. We have strengthened our approach to ensure compliance with SLAs by making changes to our system to enable us to track and monitor compliance.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Our complaint response is sent to our customer once the answer to their complaint is known and not when the outstanding actions detailed within the complaint are actioned.  Once we've provided our stage one complaint to our customer, the appropriate team who manage the service area relating to the complaint, will monitor the outstanding actions, ensure the complaint journey is running smoothly and keep our customer updated on progress through to resolution.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	We ensure that all aspects of our customers complaint are addressed, and we clearly detail the reasons for any decisions which have been made. We also ensure we make reference to any policy or law where appropriate in coming to a decision.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>The complaint stage.</li> <li>The decision on the complaint.</li> </ul>	Yes	We always ensure our complaint responses are written in clear, plain responses and that they comply with the Housing Ombudsman Complaint Handling Code. Our responses include:

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

	<ul style="list-style-type: none"> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• Details of how to escalate the matter to stage two if the resident is not satisfied with the answer.</li> </ul>		<ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The decision of the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• Details of how to escalate the matter to stage of our complaints policy if our customer is not satisfied with the outcome.</li> </ul>
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### Stage 2

Code Section	Code Requirement	Comply: Yes/No	Evidence, Commentary and any explanations
5.9	If all or part of the complaint is not resolved to the residents satisfaction at stage one, it must be progressed to stage 2 of the landlord procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint, it must clearly communicate in writing its reasons for not escalating aswell as the residents right of approach the Ombudsman about its decision.	Yes	<p>We will not unreasonably refuse to escalate our customers complaint if they are unhappy with our stage one response.</p> <p>Our complaint policy under the heading 'when will we not accept a complaint' confirms that for our customers complaint to escalate to stage two of our complaint policy, our customer should respond to their stage 1 complaint within 6 months of us issuing our formal reply. A reasonable adjustment to this approach may be considered depending on the customers personal circumstances.</p> <p>In instances where we will not accept an escalation to stage two, we will clearly communicate the reasons to our customer and also advise our customer of their right to approach the Ombudsman Service if they remain unhappy.</p>
5.10	On receipt of the escalation request, landlord must set out their understanding issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	<p>When we acknowledge a stage two complaint escalation, we will ensure we set out our understanding of the complaint, and the outcomes our customer is seeking.</p> <p>If any aspect of our customers complaint is unclear, we will ask for clarification and agree the full definition with our customer before we investigate and respond.</p>
5.11	Landlord must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	We will only escalate a complaint to stage two of our complaints policy once we have provided our customer with a stage one response and they have requested this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	To ensure the stage two complaint is approached in a fair manner, we will ensure the person considering the complaint is not the same person who considered the stage one complaint. As per our complaint policy, one of our managers will respond to our customers stage two complaint.
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeline for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>We always aim to respond to our customers complaint within twenty working days following the complaint being logged and our acknowledgment provided to our customer.</p> <p>Where we require an extension of time to respond to the complaint, this will not exceed a further 10 working days without good</p>



## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

			reason and we will always provide a good and detailed reason for the required extension of time to respond the complaint. We have strengthened our approach to ensure compliance with SLAs by making changes to our system to enable us to track and monitor compliance.
5.16	<p>Landlord must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• details of any outstanding actions.</li> </ul> <p>And</p> <ul style="list-style-type: none"> <li>• If the landlord has a third stage, details of how to escalate the matter to stage three.</li> <li>• If this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the residents remains dissatisfied.</li> </ul>	Yes	<p>We always ensure our complaint responses are written in clear, plain responses and that they comply with the Housing Ombudsman Complaint Handling Code.</p> <p>Our responses include:</p> <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The decision of the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> </ul> <p>Our complaints policy does not have a stage three escalation and stage two is the final stage of our complaints process. We always ensure we confirm to our customers in our stage two response that this the final stage of our complaint process and provide details on how to contact the Housing Ombudsman if our customer remains dissatisfied.</p>

### Stage 3

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	<p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.</p>	Yes	<p>We investigate complaints under a two-tier stage process. We initially investigate a complaint under stage one, and if our customer requests escalation to stage two, this is the final stage and is considered the 'appeal' stage. We believe this process enables us to fully investigate our customers complaint and enables us to provide a resolution to support our customers complaint.</p>
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• The complaint stage.</li> <li>• The complaint definition.</li> <li>• The decision on the complaint.</li> <li>• The reasons for any decisions made.</li> <li>• The details of any remedy offered to put things right.</li> <li>• Details of any outstanding actions.</li> <li>• Details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	<p>As per our complaints policy, we do not have a stage three complaint escalation. After stage two, we advise our customers to contact the Housing Ombudsman Service if they remain dissatisfied with the resolution of their complaint.</p>

### Best practice 'should' requirements Stage 1

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and explanations
5.2	<p>If an extension beyond 20 working days is required to enable the landlord to respond to the</p>	Yes	<p>We will always discuss any further extension beyond twenty working days with our</p>

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

	complaint fully, this should be agreed by both parties.		customers and ensure we clearly communicate the reasons for this and ensure our customer is happy to agree to the extension. We have strengthened our approach to ensure compliance with SLAs by making changes to our system to enable us to track and monitor compliance.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	We signpost our customers to the Housing Ombudsman Service if we're unable to agree an extension period with our customer. We will provide the contact details for the Ombudsman service, to ensure we are transparent and our customers are able to have easy access to their service.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	When investigating a complaint, we consider any previous reports and the background to the complaint to support our customer with a resolution to their complaint.
5.7	Where a resident raises additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would be unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	We incorporate any issues relating to the stage one complaint within our investigation and response if they are relevant and our stage one response has not been sent.  If we have sent our stage one response, or the issues would unreasonably delay our response, we will log a separate stage one complaint to investigate and advise our customer.

### Stage 2

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.		We always discuss any further extension beyond ten working days with our customer and we will ensure we clearly communicate the reasons for this and ensure our customer is happy to agree to the extension. We have strengthened our approach to ensure compliance with SLAs by making changes to our system to enable us to track and monitor compliance.
5.15	Where agreement over an extension period cannot be reached, landlord should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord response.	Yes	We signpost our customers to the Housing Ombudsman Service if we're unable to agree an extension period with our customer. We will provide the contact details for the Ombudsman service, to ensure we are transparent, and our customers are able to have easy access to their service.

### Stage 3

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively request a third stage review of the complaint. Where a third stage is in place and has been requested, the landlord must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	We do not have a stage three in our complaint process.

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord response.	Yes	We do not have a stage three in our complaints process.
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### Section 6 -Putting things right

#### Mandatory 'must' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	We understand that effective dispute resolution is key when handling our customers complaints. Where something has gone wrong, we will acknowledge this, and update our customer with how we plan to put things right.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We always ensure that any remedy offered, will reflect the extent of the service failure and the impact to our customer. This could be by way of a discretionary decision and/or payments, compensation and signposting to agencies who can support our customer. Our compensation guidelines provide a breakdown with how these decisions are made to ensure fairness. We acknowledge the importance of managing our customers expectations and will always be reasonable.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Within our complaint response, we clearly set out the details of our remedy offer and when and how this will be received. Where appropriate, we will discuss this with our customer, always ensuring we deliver our offer.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	When considering offers of discretionary payments, we also identify whether any quantifiable loss has incurred which could result in also considering compensation. We work in line with our compensation guidelines when making our offer.  When investigating a complaint, we always consider the time and trouble, the service received, the inconvenience and the personal impact to our customer. We will consider offering a discretionary payment based on these factors.

#### Best practice 'should' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	To ensure we improve our services, we regularly meet with our service areas across the business to discuss the learnings from the complaints to enable us to implement or amend processes and/or systems to benefit our customers moving forward.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Where we believe our customer may have a legal entitlement to redress, we will discuss this with our solicitors to ensure any offer made is appropriate. We will ensure we

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

			communicate any decision made with our customer with the advice of our solicitor.
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### Best Practice 'should' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing bodies receive regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Our service Delivery Committee receive an annual report detailing complaint performance and review our complaints policy annually. We have an appointed board member to lead on a positive complaint handling culture. Updates are shared with them, ahead of updates to the board for commentary and feedback.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders.</li> <li>• Regular reviews of issues and trends arising from complaint handling.</li> <li>• The annual performance report produced by the Ombudsman where applicable.</li> <li>• Individual complaint outcomes where necessary, including where the ombudsman made findings of severe maladministration or referral to the regulatory bodies. The implementation of management responses should be tracked to ensure they delivered to agreed timescales.</li> <li>• The annual self-assessment against the complaint handling code for scrutiny and challenge.</li> </ul>	Yes	Our service delivery committee receive updates at every meeting held on a quarterly basis reporting on volume, categories, performance and updated on cases with the Ombudsman and compliance with orders. Our Board receives a quarterly update on cases with the Ombudsman and actions and compliance with order are monitored by our Executive team. We Also report on themes and improvements being made to our service as a result of customer feedback from complaints. We share the annual self-assessment in a 6-month report to the Service Delivery Transformation Committee. This self-assessment will be shared on the 9th of November 2023.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	We understand the importance of recognising themes and trends to identify potential systemic issues, serious risks and where policies and procedures may require revision.  Our Senior management team meet on a monthly basis to assess key trends and themes. The outcome will also be used to inform staff and contractors to improve the delivery of our service.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> <li>• Take collective responsibility for any shortfalls identified through complaints rather than blaming others.</li> <li>• Act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>		When handling complaints, our objective reflects the need to: <ul style="list-style-type: none"> <li>• Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments monitored at our monthly business wide complaints meeting.</li> <li>• Take collective responsibility for any shortfalls identified through complaints rather than blaming others.</li> <li>• Act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>

## RHP Self-Assessment against the Housing Ombudsman Service Complaints Code – November 2023

### Section 8 -Self-assessment and compliance

#### Mandatory 'must' requirements

Code Section	Code Requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We will carry out our review every year to ensure we are compliant with the Housing Ombudsman complaint Handling code and publish on our website in Q3 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We will carry out an additional review of the annual self-assessment, should we have a significant restructure or there is a change in process.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• Report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members.</li> <li>• Publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents.</li> <li>• Include the self-assessment in their annual report section on complaints handling performance.</li> </ul>	Yes	Following each annual completed self-assessment, we will report the outcome to our governing body, share the outcome on our website for our customers to review, provide a paper copy to customers if requested, include a copy in our annual report section on complaint handling performance.

APPROVED by the RHP Group Board