#### 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 complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

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

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

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 3.1: A complaint is 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
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	Yes	<u>https://www.originhousing.org.uk/media/2ffd1o3n/complaints-</u> policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 3.5 and 3.6 states: The customer does not have to use the word 'complaint' for it to be treated as such.

	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.			A complaint that is submitted via a third party or representative will still be handled in line with our complaints policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 3.1, 3.2, 3.3, 3.4 and 3.5 states:</li> <li>We have a clear distinction between a request for a service (service request) and a complaint about a service. This policy relates to complaints about services. Service requests will be treated as a complaint if we fail to deal appropriately with the initial request.</li> <li>Service requests will also be logged as a complaint if further enquiries are needed to resolve the matter, or if the customer requests it.</li> <li>The customer does not have to use the word 'complaint' for it to be treated as such.</li> <li>This code section and requirement formed part of the Customer Relations Team Training under section "The Code" on 27 March 2024, and is subject of ongoing,</li> </ul>

				<ul> <li>monthly, quality assurance checks as part of our quality assurance framework.</li> <li>(The Customer Relations are the centralised team that handle complaints at Origin)</li> <li>In addition to this, all colleagues who handle complaints have completed The Housing Ombudsman Service – 'Dispute Resolution Module' and are subscribed members of the HOS Landlord Learning Hub.</li> </ul>
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 3.2, 3.3 and 3.4</li> <li>We have a clear distinction between <b>a</b> request for a service (service request) and a complaint about a service. This policy relates to complaints about services. Service requests will be treated as a complaint if we fail to deal appropriately with the initial request.</li> <li>Service requests will also be logged as a complaint if further enquiries are needed to resolve the matter, or if the customer requests it or if they express dissatisfaction with the response.</li> </ul>
1.6	An expression of dissatisfaction with	Yes	N/A	We complete customer surveys each month. It is a defined process that the

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.	Customer Relations Manager reviews the survey feedback each month. They then devise and implement an action plan, each month, so that, where possible, the person completing the survey can be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. If a resident wishes to make a complaint, how to do this is available from any staff member, on our website and in our complaints policy. We advise customers through the survey feedback process how they can raise a complaint
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### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy (copy provided) at section 4.3 and 4.8-</li> <li>Exclusions:</li> <li>Where we have advised a customer that we are not accepting a complaint, the customer will have the right to challenge this decision and raise a complaint to the Housing Ombudsman Service. Details of how to contact the Housing Ombudsman can be found at section 5.) of our complaints policy:</li> <li>Customers can also request contact details of the Housing Ombudsman from a staff member</li> <li>The responsibility for the final decision not to accept a complaint lies with the Head of Customer Services, in order to ensure any decisions to this point are made by a senior person and ensures a fair and reasonable approach.</li> </ul>
2.2	A complaints policy must set out the circumstances	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy (copy

in which a matter	provided) at section 4.2 and 4.6 -
will not be	Exclusions
considered as a	
complaint or	
escalated, and	
these	
circumstances	
must be fair and	
reasonable to	
residents.	
Acceptable	
exclusions	
include:	
The issue	
giving rise to	
the complaint	
occurred over	
twelve months	
ago.	
Legal	
proceedings	
have started. This is defined	
as details of	
the claim, such	
as the Claim	
Form and	
Particulars of	
Claim, having been filed at	
court.	
Matters that	
have	
previously	

	been considered under the complaints policy.			
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 4.2 and 4.6 - Exclusions: Complaint relating to an issue that occurred more than 12 months ago - discretion may be used if there is a valid reason for the delay or it relates to a safeguarding concern or health and safety issue. Where there is a long standing issue we will consider older reports as part of the background to the complaint if this will help to resolve the issue for the customer. The responsibility for the final decision not to accept a complaint lies with the Head of Customer Services, or an Executive Director to ensure any decisions to this point are made by a senior person and ensures a fair and reasonable approach.
2.4	If a landlord decides not to accept a complaint, an	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.2, 4.7 and 4.8 - Exclusions:

	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.			Where we do not accept a complaint, we will provide the customer with a detailed explanation setting out the reasons why the matter is not suitable for our complaints process. Where we have advise a customer that we are not accepting a complaint, the customer will have the right to challenge this decision and raise a complaint to the Housing Ombudsman Service. Details of how to contact the Housing Ombudsman can be found at section 5.0 in our complaints policy. Customers can also request contact details of the Housing Ombudsman from a staff member and contact details of the Housing Ombudsman are available in our website.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.3 and 4.4 - Exclusions: We will accept a complaint unless there is a valid reason not to do so. We adopt a fair and reasonable approach in these circumstances. Each complaint is considered on its own merits.

# 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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf reasonable-adjustments-policy.pdf (originhousing.org.uk)	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint) and section 10 (Equality) We ensure customers can easily make a complaint without restriction. Customers can express their dissatisfaction in whichever way they choose Customers have the option of complaining to us through any of our channels – through our website, by e-mail, phone, in person, What's App, social media and through Basil Bot/Live Chat function. We manage all complaints, regardless of the channel in which they have originated, with the same expectations and timescales and in line with our Complaints Policy. Our policy sets out our approach on this further. We also address this point further in our Reasonable Adjustments Policy
3.2	Residents must be able to raise their complaints	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint)

	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.			All staff at Origin are aware of the complaints process and are aware the complaints central mailbox is the route to log all received complaints (no matter how received) in order to initiate the complaints process. Customers can independently access this route, and other complaint registering channels too.
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	N/A	Origin notes this and encourages a positive complaint handling process. Volumes of complaints are monitored weekly and monthly and shared with the MRC (Member Responsible for Complaints) and Executive team each month. Our performance in February at 12.58 complaints per 1000 homes was just below the lower quartile position of 12.81 for our London benchmark, with the median at 7.31 complaints per 1000 homes.
3.4	Landlords must make their complaint policy available in a clear and accessible	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	Complaints Policy on our website.

reside will de stage what at eau and ti timefr respo policy be pu	rames for onding. The y must also ublished on andlord's			
3.5 explain public of the policy inform about	udsman and	Yes	<u>Complaints - Origin Housing</u>	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 12 (Communication and Publicising of the Policy)</li> <li>Our complaints policy is also published on our website alongside information about our complaints procedure.</li> <li>The complaint handling code and how we work with the Ombudsman is also on our website and can be found here: <u>About Us - Origin Housing</u>.</li> <li>Copies of our self-assessments can also be found on the same page.</li> <li>We advise customers about the Housing Ombudsman Scheme, in leaflets – which can be found in our Head Office Reception and include reference to the scheme in our</li> </ul>

				complaint acknowledgement and formal complaint response emails send during the complaints process. The Housing Ombudsman Scheme is referenced in our Complaints policy too, at section 4.6.
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 4.1</li> <li>Customers are welcome to make a complaint via an advocate. Where a complaint is made via an advocate, we will need the customer's written consent.</li> <li>An advocate or representative, on behalf of the customer, can also deal with their complaint.</li> <li>They can also represent or be present or accompany the customer at any meeting with us, where this is reasonable.</li> </ul>
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	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	The Housing Ombudsman Scheme is referenced in our Complaints policy too, at section 5.0. We also include this information at each stage of our complaints process in the communications to customers. This includes the complaint acknowledgement and both stage 1 and stage 2 formal responses.

about their	We also advertise the Housing Ombudsman
complaint.	Scheme, in leaflets and posters – which can
	be found in our Head Office Reception

# 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	Yes	Team structure – available on request	<ul> <li>We have a dedicated Customer Relations Team, who are assigned the responsibility for complaint handling, comprising of four permanent colleagues. The management of this team is led by a Customer Relations and Quality Assurance Manager, who oversees the activity of the Team is the lead for all interactions with the Housing Ombudsman.</li> <li>This is further supported by our Head of Customer Services who is the 'complaints officer' and assumes responsibility for the team and updating the governing body and also the MRC (Member Responsible for Complaints).</li> </ul>
	addition to other duties.			Alongside this, our Director of Resident Services, has overall accountability.
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	Internal escalation process – available on request	<ul> <li>All Complaints Officers have access to staff at all levels to facilitate the prompt resolution of complaints.</li> <li>We have a clearly defined internal escalation process to support facilitating the investigation of all complaints, which includes Head of Service, Executive Directors, and our Chief Executive.</li> <li>Connected to compensation, each officer has a delegated authority to resolve complaints concerning compensation, to further support resolving disputes promptly and fairly.</li> </ul>
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.	Yes	N/A	We prioritise complaint handling at Origin. To support fostering a culture of learning from complaints, we conduct quarterly 'Learning from Complaints Sessions'.

It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	We also share these learnings with our MRC (Member Responsible for Complaints).         All complaint handling colleagues received regular training and review and take learnings from all determinations received from the Housing Ombudsman.         All staff who handle complaints have completed the HOS 'Dispute Resolution Module' and are subscribed to the HOS Learning Hub.
	We have a dedicated Customer Relations Team, who are assigned the responsibility for complaint handling, comprising of four permanent colleagues. The management of this team is led by a Customer Relations and Quality Assurance Manager, who oversees the activity of the Team

### 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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	See complaints policy.

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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	Our complaints policy sets out our only 2 stage complaints policy, in line with the requirements of the Code. See section 4.11
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	Our complaints policy sets out our only 2 stage complaints process, in line with the requirements of the Code. See section 4.11
5.4	Where a landlord's complaint	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	Our complaints policy sets out our only 2 stage complaints process, in line with the requirements of the Code – See section 4.11

	response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We do not delegate the handling of complaints	We do not delegate the handling of complaints
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>When a complaint is logged at Stage 1 or escalated to Stage 2, we set our understanding of the complaint and the outcomes the customer is seeking. This is covered in our complaints policy at section 4.11 (Complaint stages) and applies to both stage 1 and stage 2 complaints:</li> </ul>

	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.			At the start of a stage 1 (or 2) complaint investigation, we will contact the customer via their channel of choice, to gain an understanding of the issues and the outcomes the customer is seeking. We call this the "complaint definition". If any aspect of the complaint is unclear, the customer is asked for clarification and the full definition agreed between both us and the customer.
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	N/A	We address this using our 'Initial contact' approach. In this contact with customers at the start of a stage 1 or stage 2 compliant investigation we agree with the customer the "complaint definition". This enables us to have a clear understanding and agreement with the customer about the full complaint investigation.
5.8	At each stage of the complaints process,	Yes	N/A	Complaints are allocated and overseen by the Customer Relations and Quality Assurance Manager. If there is any potential conflict, for example investigating a complaint about the conduct of a staff member, this will be

	complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant			<ul> <li>investigated by a line manager, independent from the colleague being complained about.</li> <li>Where any conflict of interest is highlighted, this will be addressed and managed by our Head of Customer Services and/ or Executive Director, to remove and manage the conflict of interest.</li> <li>How we handle sensitive complaints is covered in section 6.0 of our Complaints Policy.</li> <li>We continue to take a pragmatic approach in this respect and outline our approach in our policy.</li> <li>The complaint handlers regularly receive training, feedback, coaching and attend professional training courses. This is further supported by regular training.</li> </ul>
	interest; and			supported by regular training.
5.9	Where a response to a complaint will fall outside the timescales set	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages)

	out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.			
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf reasonable-adjustments-policy.pdf (originhousing.org.uk)	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint) and section 10 (Equality) All colleagues have the ability to enable the recording of any disabilities on our (Customer Relationship management System) CRM. Any reasonable adjustments are kept under active review

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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.3, 4.7 and 4.8 (Exclusions)
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	Yes	N/A	We have specific mandatory fields on our CRM system (where we record all complaints). This enables us to ensure we effectively keep full records of: - The complaint - Outcomes at each stage - Original complaint - Date received We adopt a best practice approach which enables us to record the following onto the timelines of all complaints:

with other parties, and any relevant supporting documentation such as reports or surveys.			<ul> <li>all correspondence with the customer</li> <li>correspondence with other parties</li> <li>and any relevant supporting documentation such as reports or surveys.</li> </ul>
Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. 5.13 Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	N/A	<ul> <li>All Complaints Officers have access to staff at all levels to facilitate the prompt resolution of complaints.</li> <li>We have a clearly defined internal escalation process to support facilitating the investigation of all complaints, which includes Head of Service, Executive Directors, and our Chief Executive.</li> <li>Connected to compensation, each officer has a delegated authority to resolve complaints concerning compensation, to further support resolving disputes promptly and fairly.</li> <li>We adopt an approach which enables us to ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. For example, where a request for escalation to stage 2 is made, careful consideration will be given to determine if it warrants a review at stage 2 of our process. If the only element that the customer remains dissatisfied with is compensation, we will carry out a review of</li> </ul>

				the compensation amount offered rather than a full stage 2 investigation. This supports the complaints officers being able to resolve complaints without the need for unnecessary escalation.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	unacceptable-behaviour-policy.pdf (originhousing.org.uk)	Unacceptable actions policy
5.15	Any restrictions placed on contact due to unacceptable behaviour must	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	Complaints Policy and Unacceptable actions policy

be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	unacceptable-behaviour-policy.pdf (originhousing.org.uk)	
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### Section 6: Complaints Stages

<u>Stage 1</u>

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	N/A	All complaints are triaged at the point of being logged and acknowledged. We have a dedicated Complaints Support Officer who supports and fulfils this role. This helps to identify those complaints which can be responded to as early as possible. Through this same process, if any customer is vulnerable or at risk – this enables us to prioritise the issue or complaint.

6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within</u> <u>five working days</u> <u>of the complaint</u> <u>being received</u> .	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages):</li> <li>Our aim, and in line with this policy, is to it acknowledge and log a formal complaint at stage one of our complaints procedure, and within five working days of receipt.</li> <li>In the last 6 months we have been 100% complaint with this section of The Code.</li> </ul>
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): A full written response to the complaint will be sent out as soon as possible and in any event within 10 working days. We report on performance against this monthly to our Executive Team and also to our Customer Services Committee and Board.
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – Stage 1): On occasions, it may be necessary to extend the date for a full response by up to a further 10 working days to

	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			enable us to respond fully. We will not exceed this additional time estimate without good reason. Our approach is to explain this with the customer.
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – Stage 1): Where we inform a customer about any extensions to timescales, we will provide them with contact details of the Housing Ombudsman.
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	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. We will track outstanding actions and ensure these are actioned promptly with

	be tracked and actioned promptly with appropriate updates provided to the resident.			appropriate updates provided to the customer. This applies to both stage 1 and stage 2 complaints.
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	N/A	This is a standard and adopted approach to our complaint investigation. To provide further assurance on this point, the Customer Relations Manager conducts monthly quality assurance checks, where this is a specific line item, which is monitored and evaluated.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): Where customers raise additional complaints during the investigation, this will 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 unreasonably delay the response, the complaint should be logged as a new complaint.

	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: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate	Yes	Examples available on request	All these items are included in our standardised stage 1 complaint response template.

the matter to
stage 2 if the
individual is not
satisfied with
the response.

<u>Stage 2</u>

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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2):</li> <li>If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it will be progressed to stage 2 of our complaints process. A Stage 2 complaint response is our final complaint response.</li> </ul>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): We will decide whether we can accept a stage 2 within 5 working days of the escalation being received, and will carry out our investigation, and provide the customer with a response.

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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): A customer does have to explain their reasons for requesting a stage 2. We will make reasonable efforts to understand why a customer remains unhappy as part of our stage 2 response.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): At stage 2, the review will be carried out by the appropriate next level manager who has not previously been involved in the complaint, usually a Head of Service or Assistant Director. This manager will not have previously been directly involved in the complaint investigation.
6.14	Landlords must issue a final response to the stage 2 <u>within 20</u> working days of	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2):

	the complaint being acknowledged.			The allocated staff member will aim to respond to the stage 2 response as soon as possible. We will decide whether we can accept a stage 2 within 5 working days of the escalation being received, and will carry out our investigation, and provide the customer with a response within 20 working days.
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	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): In the very limited circumstances where it is not possible to provide a full response within 20 working days, we will contact the customer to explain this, setting out the reasons why and when they can expect to receive the response. In this circumstance, we may extend the time we have to investigate and respond to the complaint by a further 20 working days, but not without good reason, and we will clearly explain the reasons with the customer.
6.16	When an organisation informs a resident about an extension to these timescales, they	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2):

	must be provided with the contact details of the Ombudsman.			Where we inform a customer about an extension or where agreement over an extension period cannot be reached, we will provide customers with the Housing Ombudsman's contact details so the customer can challenge our decision.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. We will track outstanding actions and ensure these are actioned promptly with appropriate updates provided to the customer. This applies to both stage 1 and stage 2 complaints.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This is a standard and adopted approach to our complaint investigation.</li> <li>All stage 2 complaint responses are quality checked and reviewed by an Executive Director before they are issued to customers</li> </ul>

6.19	referencing the relevant policy, law and good practice where appropriate. Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the	Yes	Examples available on request	All these items are included in our standardised stage 2 complaint response template.
	g. details of			

	remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	<ul> <li>This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages):</li> <li>A Stage 2 complaint response is our final complaint response.</li> <li>All stage 2 complaint responses are quality checked and reviewed by an Executive Director before they are issued to customers and enables all suitable staff members needed to issue such a response.</li> </ul>

# Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising;	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.12 and 4.13 (Outcomes and remedies) <b>Complaint remedies</b> Where something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right. These can include:

	<ul> <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>			<ul> <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> </ul> We also revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in March 2024
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	https://www.originhousing.org.uk/media/2ffd1o3n/complaints- policy-april-2024.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.12 and 4.13 (Outcomes and remedies) Any remedy offered will reflect the impact on the customer as a result of
7.3	The remedy offer must clearly set out what will happen and	Yes	N/A	any fault or service failing identified. We currently adhere to this code requirement.

	by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			We also revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in March 2024
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	N/A	We revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in March 2024

# Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self- assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non- compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the	Yes	The annual complaints performance and service improvement report. The self-assessment against the HOS code Reports to CSC <u>Complaints - Origin Housing</u>	We produce an annual complaints performance and service improvement report Our complaint handling figures are reported in our annual report and we share complaint handling satisfaction and information with our resident panel, Spotlight. This then informs scrutiny projects. Staff are updated quarterly during the Learning from Complaints workshops. We share the drivers behind complaints and our performance as part of the annual report to residents together with the areas for service improvement that we are focusing on a result of resident feedback. Other updates are provided during the year through Resident Newsletters and website articles. Performance and complaint handling satisfaction and information is also shared with our resident panel, Spotlight Staff are updated quarterly during the Learning from Complaints workshops. The outcomes of HOS determinations and the annual HOS landlord report are shared with our Customer Services Committee and Board. This annual self assessment is shared on our website

	Ombudsman in relation to the work of the landlord.			
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	The annual complaints performance and service improvement report can be found here on our website: <u>Complaints - Origin Housing</u>	This information is provided to the Customer Service Committee on a quarterly basis and through the annual self-assessment which is then shared with the Board. We share the drivers behind complaints and our performance as part of the annual report to residents together with the areas for service improvement that we are focusing on a result of resident feedback.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	Thie code requirement is noted, and we will adhere
8.4	Landlords may be asked to review and update the self- assessment following an Ombudsman investigation.	Yes	N/A	Thie code requirement is noted, and we will adhere
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	N/A	Thie code requirement is noted, and we will adhere

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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	N/A	<ul> <li>We currently adhere to this code requirement.</li> <li>In our comlpaint investigations and responses we focus on anything we can consider to be 'put right' and use the stance of "placing the customer back in the position they were in before they needed to make the complaint"</li> <li>Our wider approach to learning from complaints is focussed in our quarterly 'Learning from Complaints Sessions', where we review, through a wider lens, any opportunities to review our policies, processes and systems and dynamically review if they remain a benefit to all residents. This can take the format of: <ul> <li>acknowledging where things have gone wrong</li> <li>providing an explanation, assistance or reasons</li> <li>apologising</li> <li>taking action if there has been a delay</li> <li>reconsidering or changing a decision</li> <li>amending a record</li> <li>providing a financial remedy</li> <li>changing policies, procedures or practices</li> </ul> </li> <li>This two option approach allows us to look beyond individual complaints, review potentially systemic issues and address them with the benefit for residents at the heart of this approach.</li> <li>We also share these findings with our (MRC) Member Responsible for Complaints for accountability at governance and Board level.</li> </ul>
9.2	A positive complaint handling culture is integral to the	Yes	N/A	We address this specific point at our quarterly Learning from Complaints Sessions.

# Section 9: Scrutiny & oversight: continuous learning and improvement

	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.			
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	N/A	Our complaint handling figures are reported in our annual report and we share complaint handling satisfaction and information with our resident panel, Spotlight. This then informs scrutiny projects. Staff are updated quarterly during the Learning from Complaints workshops.
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	N/A	Vicki Bonner, Chair of the Customer Service Committee and Board Member, has been appointed as the lead. This operational role is supported by an Exec Director, our Director of Resident Services.
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	N/A	Vicki Bonner, Chair of the Customer Service Committee and Board Member, has been appointed as the lead.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on	Yes	N/A	Our MRC is provided with monthly complaints data and has attended our Learning from Complaints sessions to support fulfilment of this role.

	<ul> <li>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.</li> <li>As a minimum, the MRC and the governing body (or equivalent)</li> </ul>			
9.7	<ul> <li>must receive:</li> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	N/A	Our MRC is provided with monthly complaints data and attends our Learning from Complaints sessions to support fulfilment of this role. The Customer Services Committee of which our MRC is chair of, also meet once a quarter and within these meetings we address and discuss the following: - regular updates on complaints - regular reviews of issues and trends - outcomes of all Housing Ombudsman investigations - annual complaints performance and service improvement plans
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;	Yes	N/A	We have a standard objective in relation to complaint handling for all relevant employees that reflect this code requirement, which commence from 1 April 2024.

<ul> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>			
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