

AGENDA ITEM 5 - Appendix 2



Complaints Code Self-assessment 2024-25

We have assessed that we are compliant with the new Code. We continue to have a Complaint Handling Improvement Plan to take account of learning, service development and best practice. The information provided in this assessment covers Newlon Housing Trust and Access Homes.

Section 1: Definition of a complaint

Code provision	Code requirement	Compliant: 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	Complaints Policy states in section 5 'A complaint is 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'. In relation specifically to staff complaints we recognised that we needed to revise and strengthen our approach and we have publicised this to staff through our Team Brief, as well as attending key services team meetings.	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's Complaints Policy.	Yes	Complaints Policy states in section 5 'The resident does not have to use the word complaint for it to be treated as such. Staff should recognise the difference between a service request (pre- complaint), survey feedback and a formal complaint and take appropriate steps to resolve the issue for residents as early as possible.' Briefing sessions were held with staff to ensure that they are clear on this following recent Ombudsman determinations. Carried out between June and September 2024.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	<p>Complaints Procedure states the following in Section 1</p> <p>‘A service request is a first request requiring action to be taken to put something right. This could relate to a repair, provision of service or action, where the timeframe for delivering that repair or action has not yet passed or where it can be easily resolved to the customer’s satisfaction at the first point of contact’.</p> <p>‘Where there is a clear breach of service standards, or it is not possible to provide an explanation and a resolution to the resident’s dissatisfaction at the first point of contact and the resident is dissatisfied with the handling of repairs/repetitiveness of the issue then this should be logged as a formal Stage 1 complaint. An example of this is a complex repair matter where there have been several failed appointments and there are several different activities still outstanding’.</p> <p>All service requests whether it be reporting ASB or reporting a repair are logged on the Customer Relationship Management system and these cases are managed by relevant teams. All contacts are then monitored as part of review of levels of customer contact.</p> <p>To strengthen awareness briefings were held with staff between June and September 2024.</p> <p>We are developing our reporting on service requests to provide a better overview and improve transparency of reporting and this is part of our ongoing improvement plan.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	<p>Complaints Procedure has been updated to state in Section 1.4</p> <p>‘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. At this time efforts to address the service request should not be stopped if the resident complains’.</p> <p>Briefing sessions were held with staff to ensure that they are clear on this. These were carried out between June and September 2024</p>	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>Complaints Policy states in Section 1</p> <p>‘Where residents are expressing clear dissatisfaction with a service as part of their feedback in a survey that Newlon have carried out, this should be passed on to the Service Resolution Team to log as a complaint’.</p> <p>The survey company working on Newlon’s behalf ensure residents are aware of the complaints process if they are dissatisfied. The survey company flags this and passes on to us. We categorise it depending on the severity of the issue. The case is then triaged to key service leads to manage. We are developing some automation around this for greater efficiency.</p>	

Section 2: Exclusions

Code provision	Code requirement	Compliant: 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	Complaints Policy states in Section 5 'If a request to make a complaint is not accepted, (see Complaints Procedure section on exceptions to procedure for more details) then the reasons for this must be clearly outlined and the person given the right to appeal. Each case should be considered on its own merits. This appeal should be considered by the Assistant Director for Housing or in their absence the Head of Service Improvement'.	We have created a case type of 'refused complaint', so that these can be monitored. We have not refused any complaints.
2.2	<p>A Complaints Policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the Complaints Policy. 	Yes	Complaints Procedure outlines exceptions, listed in Appendix 2 including these three.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	Complaints Procedure states in Appendix 2 'Complaints will not generally be accepted if the issue giving rise to the complaint occurred over twelve months ago, unless there are good reasons to apply any discretion'.	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	The Complaints Policy states in Section 5 'if a request to make a complaint is not accepted, (see Complaints Procedure section on exceptions to procedure for more details) then the reasons for this must be clearly outlined and the person given the right to appeal. Each case should be considered on its own merits. This appeal should be considered by the Assistant Director for Housing or in their absence the Head of Service Improvement. When writing to advise the resident of the decision, this should include information on their right to take that decision to the Ombudsman'.	We have created a case type of 'refused complaint', so that these can be monitored. We have not refused any complaints.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	See above wording.	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Compliant: 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	<p>Complaints Policy states in Section 1 'The complaints process must comply with the Equality Act 2010 and we may need to adapt normal policies, procedures, or processes to accommodate an individual's needs and make reasonable adjustments to address this. (See our Reasonable Adjustments Policy for further details.)'</p> <p>The Complaints Policy outlines in Section 1.1. how residents can make complaints by the following methods; online, by letter, by e-mail, by phone, in person – by appointment only, as well as via an advocate.</p> <p>The Complaints Policy states in Section 1.1 'Where complaints are made via social media channels that Newlon uses, if it is possible to identify the complainant then the Communications Team will notify the Service Resolution Team of this in order that they may manage this complaint from then on. Where it is not possible to identify the complainant, a reply will be sent where possible asking them to contact the Service Centre'.</p> <p>We have updated our Reasonable Adjustments policy, incorporating our Vulnerability policy. This has drawn from the Spotlight report on Attitudes, Respect and Rights.</p> <p>In March 2025 we held sessions for the whole organisation on our new standards and focused on communication, data and diverse needs to ensure staff are clear on responsibilities.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Policy states they can be made to any member of staff. Briefings have taken place to ensure that all staff are clear on this	
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	We believe that our approach shows we have made it easy for residents to make a complaint. We have a relatively high level of complaints and believe that this demonstrates our open access to the complaints process. We also regularly promote the complaints process in our residents' newsletters and on our website.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	The policy makes clear that it is a 2-stage process. Our complaints process is accessible, we publicise this on the website, in leaflets, promote in newsletters, report on it annually in our residents' annual review and give it to new residents before they move into their home and. The leaflet explains how residents can contact Newlon to ask for an alternative format such as Braille, large print or easy read.	We have carried out Quality Audit to test this with 100% compliance achieved.

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
3.5	The policy must explain how the landlord will publicise details of the Complaints Policy, including information about the Ombudsman and this Code.	Yes	Complaints Policy outlines in Section 2 how we publicise our policy and lists the following; this is done during the sign-up process, when you first become a Newlon resident, on our website, in our 'contact us' section. Information is also available in our Head Office reception area, from any staff members and in our residents' newsletter, where there is also information on how we use feedback.	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy states in Section 3 'A person acting on behalf of a resident can make a complaint on behalf of a resident tenant, but unless Newlon has express permission in writing to liaise with them as an advocate, all communication around the complaint will be with the resident. If a resident lacks capacity to authorise a representative, adequate evidence of their legitimate authority must be provided. This also includes a person with authority to make a complaint on behalf of any people described above who are deceased'.	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Our Complaints Procedure includes a clear explanation of the different complaint stages, including residents' right to take the matter to the Ombudsman, detailing what will happen at each stage and timeframes for responding. This is documented throughout the procedure. The website includes the Ombudsman's details, and we regularly publicise the complaints process, including the Ombudsman's role in our newsletter. The standard templates used for Stage 1 and 2 complaint responses has information about the Ombudsman.	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>Complaints Procedure states 'Whilst the Service Resolution team will largely be responsible for responding to the complainant, the Service Manager will need to take responsibility for ensuring that actions are delivered, and solutions identified. This can involve identifying a series of actions within agreed timescales to resolve the complaint and identifying alternative solutions in a timely manner should the original actions not resolve the issues'.</p> <p>In addition, the Service Improvement team (SI team) are responsible for liaising with the Ombudsman over individual cases as well as reviewing spotlight and other good practice reports. The SI team are also responsible for reporting to the Board on complaints performance. This is documented in the Complaints procedure in Section 9.</p> <p>Actions required for resolving complaints are managed using tasks on our CRM system and weekly reminders are sent out for these.</p>	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<p>The Complaints Procedure states in Section 4.3 'The service resolution managers will consult with the relevant teams but will have the authority to decide on the best resolution for the complaint. In the case of complaints about the repairs service, they will need to consider budgetary constraints, but may choose to:</p> <ul style="list-style-type: none"> • Instruct a contractor to expedite repairs. • Instruct a contractor to provide a written plan to fully remedy an issue including consideration of a 'plan B' in case original assumptions are incorrect or timescales are not met. • Obtain a second opinion on a complex repair issue. • Use an alternative contractor. • Undertake a remote video inspection of issues with the agreement of the resident. 	We have improved the visibility of performance reporting on complaint handling to ensure that complaints staff are better supported by the rest of the organisation to enable them to more promptly

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			<ul style="list-style-type: none"> Schedule an inspection by a surveyor. In some exceptional cases they may even consider something outside of normal arrangements if it is in the interests of resolving the complaint. Where appropriate the cost will be met by the incumbent contractor. <p>In the past year we have increased resources within the Service Resolution team, as well as in Property services focusing on resolving complaints.</p> <p>Following a summer spike in complaint numbers we launched a Complaints Recovery Plan, which focused on effectiveness of complaints handling; more speedily delivering actions promised in complaints and tackling the root cause of complaints to reduce new complaints. This plan was shared with all staff to raise the priority of this work.</p> <p>Our Team Brief has updates on our progress and fortnightly KPI updates go to service leads.</p>	resolve complaints.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes	<p>Complaints Procedure states in Section 10.2 'Complaints provide senior staff and service managers and team leaders with an insight into day-to-day operations allowing them to assess effectiveness and drive service improvement by learning'.</p> <p>Monthly meetings are held with service leads to look at learning from complaints and discuss progress on the actions. In addition, we have a programme of reviewing Stage 2 complaints that have been replied to but have actions outstanding for more than 3 months to ensure that appropriate actions are in place to resolve the complaint.</p> <p>Complaints are communicated as a high priority with corporate messages, reporting to executive meetings, Leaders Forum and staff All in Days. This ensures that all are clear on their role in the successful management of complaints.</p>	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy and procedure in place.	
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	We have a two-stage process. We closely monitor the escalation rate from stage one to two, and we aim to resolve as many complaints as possible at stage one, reducing resident effort.	
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	As above.	A recent Quality Audit has provided assurance on this.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Newlon are responsible for complaints about their services. Our Complaints policy & procedure covers how complaints about operatives will be managed and makes clear that complaints regarding contractors are treated as Newlon's complaints.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See above.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<p>Complaint procedure states in Section 4.1 ‘logging and acknowledgement of complaint – five working days within receipt of complaint, this should make it clear who will be responding and within what timescale, as well as outlining what our understanding of the complaint is, and the outcomes sought. If this is unclear this should be clarified with the resident’.</p> <p>We have introduced Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether the officer managing the complaint captured what the complaint was about and the resolution being sought.</p>	
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	Complaints Procedure states in Section 4.1 ‘it must be made clear which aspects of the complaint Newlon are, and are not, responsible for, and clarify any areas where this is not clear’.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind. b. give the resident a fair chance to set out their position. c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	<p>Complaints Procedure states in section 4.2 'we deal with complaints on their merits:</p> <ul style="list-style-type: none"> • Act impartially and have an open mind. • Consider all information and evidence carefully. • Take measures to address any actual or perceived conflict of interest'. 	
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<p>Complaints Procedure states in Section 4.1:</p> <p>'Stage one response outlining the decision – 10 working days from the date the complaint was logged and acknowledged'</p> <p>'Extensions – where this is not possible, an explanation to the resident containing a clear timeframe for when the response will be received should be sent. This should not exceed a further 10 days without good reason. This is to be done by the Service Resolution team. If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties'.</p> <p>Complaints Procedure states in Section 5 'The Service Resolution team will be responsible for the case management of all Stage 2 complaints, providing regular feedback to residents and ensuring</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
			<p>actions agreed as the resolution for the Stage 2 complaints are carried out. They are responsible for keeping the customer informed about any delays and progress of responding or dealing with the complaint’.</p> <p>The Complaints Procedure states in Section 2 ‘Keep the complainant updated or regularly informed even if there is no specific update, we should make telephone contact, so the resident is aware the issue is still being managed’.</p> <p>It also states in Section 4 ‘The Service Manager will be responsible for ensuring the Service Resolution Managers’ instructions are executed. The Service Resolution Managers will be responsible for the case management of all stage 1 complaints, providing regular feedback to the complainant, ensuring actions agreed as the resolution for the stage 1 complaints are carried out, and keeping the customer informed about any delays and progress’.</p> <p>We have introduced Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether the resident was contacted throughout the complaint and updated with progress. We measure complaint extensions as a KPI.</p>	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>The Complaints Policy states in Section 1 ‘The complaints process must comply with the Equality Act 2010, and we may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs and make reasonable adjustments to address this. (See our Reasonable Adjustments Policy for further details.)’</p> <p>We have reviewed our Reasonable Adjustments policy and merged this with the Vulnerability policy and briefed staff.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	<p>Complaints Procedure states in Section 5</p> <p>‘Where it is felt, following an initial review that the Stage 1 response is the final position, and the matter should not be escalated to Stage 2, then the matter should be raised with two of the following senior managers to review: Housing Services Director, Assistant Director of Housing or Head of Service Improvement’.</p> <p>‘If this is agreed then an explanation of the decision not to escalate must be given to the resident. It should make clear that the previous response was Newlon’s final response to the complaint and provide information on how the complainant can make a referral to the Ombudsman’.</p>	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint, and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	The Complaints procedure states in Section 3 ‘A full record of the complaint must be recorded on Dynamics with clear outcome at each stage, this includes all correspondence with the resident and relevant parties as well as any relevant documentation such as reports or surveys’.	We have carried out a Quality Audit to check on record keeping for complaints. There were high levels of compliance.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<p>Complaints Procedure states in Section 3 ‘Whilst the Service Resolution team will largely be responsible for responding to the complainant, the Service Manager will need to take responsibility for ensuring that actions are delivered, and solutions identified. This can involve identifying a series of actions within agreed timescales to resolve the complaint and identifying alternative solutions in a timely manner should the original actions not resolve the issues’.</p> <p>Both stage 1 and stage 2 complaints are dealt with by the Service Resolution team and staff have experience of managing both stages</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
			so are empowered to resolve complaints at stage 1 without the need for 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	<p>This is documented in Appendix 1 of our Complaints Procedure – managing unacceptable behaviour from complainants.</p> <p>We have a policy around this which has been reviewed in the past year. Sessions have been held at staff All in Days to ensure staff are clear of their responsibilities.</p>	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	The Unacceptable Behaviour Policy outlines how services are delivered when restrictions are put in place. This has been updated in the past year to strengthen reference to the Equality Act 2010 and reflect the key staff we have now in place to offer support to residents.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy in Section 6 states ; We aim to 'triage' complaints to ensure complaints that can be resolved promptly are done so and that where there are vulnerabilities these are prioritised to reduce any risk or impact on the resident.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the Complaints Procedure within five working days of the complaint being received .	Yes	Complaints Procedure states in Section 4.1 'logging and acknowledgement of complaints must be completed within five working days within receipt of complaint'. 'This should make it clear who will be responding and within what timescale, as well as outlining what our understanding of the complaint is, and the outcomes sought. If this is unclear this should be clarified with the resident'.	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints Procedure states in Section 4.1 'stage one responses outlining the decision – 10 working days from the date the complaint was logged and acknowledged'.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>Complaints Procedure states in Section 4.1 'Extensions – where the timescale is possible to be met, due to the complexity an explanation to the resident containing a clear timeframe for when the response will be received should be sent. This should not exceed a further 10 days without good reason. This is to be done by the Service Resolution team. If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties'.</p> <p>We have introduced Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether a complaint was extended with good reason. Cases that have been extended are being checked monthly by the Service Resolution Team Leader</p>	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This has been added to Procedure and complaint template letters.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>Complaints Procedure states under Section 4.2.</p> <ul style="list-style-type: none"> • 'The details of any remedy offered to put things right, including an assessment of compensation where appropriate. Any remedy should reflect the level of impact that the service failure it has had on the resident. • The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied'. <p>We monitor progress for all complaints that are open and have been responded to, but where the actions promised in the response have yet to be delivered and this information is shared with our executive team and Resident Services Committee of the Board. We need to</p>	Outstanding actions for complaints are tracked and chased on weekly basis, with reporting to all leaders and executive team.

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
			improve how speedily we deliver on our promises and will continue to focus on this.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Complaints Procedure states in Section 4.2 'the response should include a response on all the issues that have been complained about, an explanation where appropriate for the service failure, the reasons for any decisions made referencing the relevant policy, law and good practice where appropriate'.</p> <p>Briefing sessions have been held with staff to ensure all staff are clear on this.</p> <p>We have introduced Score buddy, which scores a selection of complaint responses on a variety of measures, including whether all aspects of the resident's complaint were captured in the response.</p>	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p>Complaints Procedure states in Section 4.3 'Where a resident has raised new issues, these should be included in the investigation and the Stage 1 response, where they are related. Where the Stage 1 response has been issued, or it would cause a delay in the response being sent or the issues are not related, then a separate and new complaint should be logged regarding these. Where the resident then wishes to escalate both matters and they are both at the same stage then these would be managed better if they were merged to ensure that there is clear communication on all outstanding matters'.</p> <p>Briefing sessions have been held with staff to ensure all staff are clear on this.</p>	A recent Quality Audit showed that staff are clear that new issues should be treated as separate complaints

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage. the complaint definition. the decision on the complaint. the reasons for any decisions made. the details of any remedy offered to put things right. details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Section 4.2 of Complaints Procedure has been amended to reflect this. Complaints template letters have also been updated.	

Stage 2 Code provision	Code requirement	Compliant: 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	We have a two-stage process allowing the complainant to escalate their complaint if they are unhappy with the outcome of the Stage 1 process.	

Stage 2 Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	Complaints Procedure states in Section 5.1 'Stage 2 responses should be acknowledged within five working days of the request to escalate, this should include a definition of the Stage 2 Complaint'.	
6.1.	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	Complaints Procedure states Section 5.1 'In accordance with the Code, residents are not required to explain their reasons for requesting an escalation and instead reasonable efforts must be made to understand the reasons why a resident remains unhappy'.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy states in Section 6 'the Stage 2 complaint will be managed within the Service Resolution team by a member of staff who has not previously been involved with the complaint'.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints Procedure reflects this. Performance is monitored and demonstrated in the Board and Residents Forums papers.	
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.	Yes	Policy reflects this in Section 5.1 We have introduced Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether a complaint was extended with good reason.	

Stage 2 Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
	Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	The Complaints Policy and template letters reflect this.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>Complaints Procedure states in Section 5.1 'we will respond with 'the details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied'.</p> <p>We recognise that this is an area where we need to improve. We have been focusing on this and will continue to do so until we are satisfied that there have been improvements in this area.</p> <p>We have added new resource into this area to ensure that complaints can be resolved much quickly.</p> <p>We send out weekly reminders to service leads for all outstanding tasks and escalate to Executive leads where needed.</p>	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Procedure reflects this in Section 5.1.</p> <p>Briefing sessions have been held with staff to ensure all staff are clear on this.</p> <p>We have introduced Score buddy, which scores a selection of complaint responses on a variety of measures, including whether all aspects of the resident's complaint were captured in the response.</p>	

Stage 2 Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> The complaint stage; The complaint definition. The decision on the complaint. The reasons for any decisions made. The details of any remedy offered to put things right. Details of any outstanding actions; and Details of how to escalate the matter to the ombudsman service if the individual remains dissatisfied. 	Yes	<p>The Complaints Procedure States Section 5.1 the Stage 2 responses should include:</p> <ul style="list-style-type: none"> • ‘The complaint stage. • What the issues are that the resident remains unhappy about. • A review of the stage 1 decision and decide whether the complaint was handled: <ul style="list-style-type: none"> • In accordance with Newlon’s policies and procedures. • Thoroughly having considered all the available relevant facts. • Fairly and reasonably. • An apology for any service failure. • A response on all the issues that have been complained about. • An explanation where appropriate for the service failure. • The outcome of the complaint. • The reasons for any decisions made referencing the relevant policy, law and good practice where appropriate. <ul style="list-style-type: none"> • The details of any remedy offered to put things right, including an assessment of compensation where appropriate. • The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied. • A clear explanation of the different complaint stages, including their right to take the matter to the ombudsman, detailing what will happen at each stage and timeframes for responding’. 	In a recent Quality Audit 100% of cases checked, complainant had been advised that they could escalate the complaint and advised of HOS.
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>Our Complaints Procedure references joint working in Section 4.3.</p> <p>Newlon have a Trust Newlon plan to develop and embed greater levels of joint working to improve service delivery</p>	

Section 7: Putting things right

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance or reasons. • Taking action if there has been delay. • Reconsidering or changing a decision. • Amending a record or adding a correction or addendum. • Providing a financial remedy. • Changing policies, procedures or practices. 	Yes	<p>This is covered in our approach to responding to complaints in our Complaints Procedure.</p> <p>All staff are undergone 2 sets of training on Newlon New Way, the first focusing on residents and the latter focused on internal collaboration across teams.</p> <p>Our CRM system used for managing complaints has a mandatory field for all complaints to complete a learning from complaints comment. Our Scorebuddy system also checks that these are being completed and where this has not been done this is fed back to staff. These are then reviewed at our monthly Learning from complaints meetings.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>This is reflected in formulating a remedy in our Complaints Procedure in Section 4.2</p> <p>We are strengthening our approach around services to vulnerable residents and raising staff awareness in this area, as part of the action plan identified from the Spotlight report on Attitudes, Respect and rights.</p> <p>In a recent Quality Audit, there was assurance that staff demonstrated that they had taken into consideration the impact the service failure had had on the individual circumstances of the resident.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints Procedure states in Section 5.1 that we should set out ‘the details of any remedy offered to put things right, including an assessment of compensation where appropriate. Any remedy should reflect the level of impact that the service failure has had on the resident. The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied’.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>When guidance is issued by the Ombudsman the relevant policies/procedures are updated and relevant staff are advised on guidance. In addition, when spotlight reports have been published these are reviewed and action plans devised to reflect where changes and improvements are required.</p> <p>When the Ombudsman issues a new determination a review meeting is held to identify what changes are required and this is cascaded to relevant staff to ensure that remedies identified meet best practice.</p>	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept. c. any findings of non-compliance with this Code by the Ombudsman. d. the service improvements made as a result of the learning from complaints. e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>This is reflected in 3.3 of the Complaints Procedure. Regular reports go to the Residents' Forum, Residents' Services Committee (on a quarterly basis) and the Board.</p> <p>The Board paper on Complaints & Service Improvement is on the website and the Ombudsman annual report on landlords is reported to Board/RSC once published and is also available on the Newlon website.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	Procedure states in Section 11.2 'this is reported to the Board and then published on the website with the Board's response'. In previous years the Self-Assessment has been published on the website and reported to Board.	Action - This will be done following annual report to the Board in June.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	n/a	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	This is done when required.	
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	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>Complaints Procedure states in Section 10.2 'feedback will focus on the service provided/complained about and be Specific Measurable Achievable, Realistic and Timely. Learning may be about improving the complaints process and should also be about how we can stop complaints and improve services'.</p> <p>We have been building learning from complaints into our culture and hold monthly learning meetings and are continually progressing and adding to our learning from complaints plan.</p> <p>All Ombudsman determinations are reviewed and a lessons learnt template developed, listing the orders/recommendations as well as identifying key changes that are required across policy or practice. These are then followed up in the monthly learning from complaints meetings held.</p>	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Complaints Procedure states in Section 10.2 'complaints provide senior staff, service managers and team leaders with an insight into day-to-day operations allowing them to assess effectiveness and drive service improvement by learning from:</p> <ul style="list-style-type: none"> • Feedback from the Service Resolution Team. • Stage 2 complaints review meetings. • Ombudsman cases discussed with senior managers and directors responsible for cascade as relevant • Review by the residents' Complaints Panel. • Contract management meetings with contractors'. <p>We have a Learning from Complaints page on our website and regularly include this in our newsletter. In addition, reports go regularly to Executive team and include observations from the Board.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
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	We report to the Residents' Services Committee, and to residents in the newsletter, as well as the Residents' Forum and staff. We have plans to develop this further with the new role of the Residents Forum and increased transparency to residents through the website. We regularly report in our residents newsletter on Learning from Complaints. In addition, we have a page on our website specifically on this.	
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	Our Housing Service Director has been identified as the lead person.	
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	Procedure reflects this in Section 11.4 . Member of the Board appointed as MRC who is a resident.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight	Yes	Procedure reflects this in Section 11.4 . The MRC has experience of complaints as was an active member of the Residents' Complaints Panel when this was the final stage of the complaints process at Newlon. They have recently attended training around this role.	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
	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.		<p>The MRC meets regularly with the Housing Services Director and the Heads of Customer Services and Service Improvement and has attended Staff All in Days. Meetings focus on key trends in complaints as well as looking at any concerns around performance.</p> <p>The MRC was also involved in a scrutiny piece of work on which reviewed Newlon's approach to learning from complaints.</p>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling. c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>Procedure reflects this Section 11.4 .</p> <p>Reports go to RSC on a quarterly basis, bi-annually to the Residents Forum and annually to the Board on these areas.</p> <p>The MRC is a Resident Forum and Board member. The MRC was involved in the completion of the self-assessment.</p> <p>In addition, the regular meetings with staff provide regular updates on issues and trends arising from complaint handling.</p>	

Code provision	Code requirement	Compliant: Yes/No	Evidence	Commentary/ explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>This is being added as a specific objective for all staff with responsibility for complaint handling.</p> <p>To seek assurance on this, we carried out a voting poll to check with managers that this had been done, most managers confirmed that this had been done. Going forward standard wording is being provided for key service leads to ensure consistency of adoption.</p>	