#### 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<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation  |
|-------------------|--|---------------------|---|---|
| 1.2               | A complaint must be defined as:<br>'an expression of dissatisfaction,<br>however made, about the standard<br>of service, actions or lack of action<br>by the landlord, its own staff, or<br>those acting on its behalf, affecting<br>a resident or group of residents.'  | Yes                 | Abri's Complaints Policy and<br>Procedure includes this<br>definition.                                      |   |
| 1.3               | A resident does not have to use the word<br>'complaint' for it to be treated as such.<br>Whenever a resident expresses<br>dissatisfaction landlords must give them<br>the choice to make complaint. A complaint<br>that is submitted via a third party or<br>representative must be handled in line<br>with the landlord's complaints policy.                                | Yes                 | Abri's Customer Relations<br>Procedure confirms this in the<br>Complaint Definition Section at<br>4.1.      | Update to Customer Relations<br>Procedure to reflect that<br>customer must be asked if they<br>would like a complaint to be<br>raised whenever they express<br>dissatisfaction.<br>Customer Contact team to update<br>Knowledge Base articles to ensure<br>all Customer Contact Advisors are<br>aware of the change.  |
| 1.4               | Landlords must recognise the difference<br>between a service request and a<br>complaint. This must be set out in their<br>complaints policy. A service request is a<br>request from a resident to the landlord<br>requiring action to be taken to put<br>something right. Service requests are not<br>complaints, but must be recorded,<br>monitored and reviewed regularly. | Yes                 | Abri's Complaints Policy,<br>Customer Relations Procedure<br>and Service Request Procedure<br>confirm this. | At tab 3.2, Abri's Complaints<br>Policy states, 'A complaint is<br>different to a service request<br>requiring action to be taken to put<br>something right.<br>At tab 3.3 the policy states, 'Abri<br>recognises the difference between<br>a service request and a complaint.<br>A service request is a request from |

|     |  |     |   | Abri requiring action to be taken<br>to put something right. Service<br>requests are not complaints, but<br>are recorded, monitored, and<br>reviewed regularly. '<br>Abri's Customer Relations<br>Procedure details the 'Local<br>Resolution' scheme in place with<br>Abri's Homecare Team, allowing<br>for the response to dissatisfaction<br>with service requests raised by a<br>customer, in advance of a formal<br>complaint being raised. |
|-----|--|-----|---|---|
| 1.5 | A complaint must be raised when the<br>resident expresses dissatisfaction with the<br>response to their service request, even if<br>the handling of the service request remains<br>ongoing. Landlords must not stop their<br>efforts to address the service request if the<br>resident complains.  | Yes | Abri's Customer Relations<br>Procedure and Service Request<br>Procedure confirm this. | Abri's Service Request Procedure<br>has been updated to confirm Abri<br>will raise a complaint should the<br>customer express dissatisfaction<br>with the response to their service<br>request. However, this will not<br>stop efforts to address the service<br>request.   |
| 1.6 | An expression of dissatisfaction with<br>services made through a survey is not<br>defined as a complaint, though wherever<br>possible, the person completing the survey<br>should be made aware of how they can<br>pursue a complaint if they wish to. Where<br>landlords ask for wider feedback about<br>their services, they also must provide<br>details of how residents can complain. | Yes | Abri's Customer Relations<br>Procedure confirms this.                                 | Abri's surveying tool (Rant and<br>Rave) offer customers information<br>on how they can pursue a<br>complaint via a hyperlink.  |

#### Section 2: Exclusions

| Code<br>provision | Code requirement  | Comply:<br>Yes / No | Evidence   | Commentary / explanation   |
|-------------------|---|---------------------|--|--|
| 2.1               | Landlords must accept a complaint unless<br>there is a valid reason not to do so. If<br>landlords decide not to accept a complaint<br>they must be able to evidence their<br>reasoning. Each complaint must be<br>considered on its own merits. | Yes                 | Abri's Customer Relations Procedure<br>confirms under what circumstances a<br>complaint may not be accepted at<br>section 5.7. | Updated Procedure to make<br>it clear that onus is on<br>complaint officer/decision<br>maker, who must evidence<br>reasons for rejecting a<br>complaint.<br>Section 5.7 of the Customer<br>Relations Procedure states,<br>'If Abri has valid reason not<br>to accept a complaint, or to<br>deal with it differently, we<br>will be able to evidence the<br>reasoning, and explain to the<br>customer the reasons why<br>the matter is not suitable for<br>the complaints process or<br>outline how we are dealing<br>with it and why, and the<br>right to escalate the<br>complaint, including to the<br>Ombudsman Service.' |
| 2.2               | A complaints policy must set out the<br>circumstances in which a matter will not<br>be considered as a complaint or escalated,<br>and these circumstances must be fair and  | Yes                 | Abri's Complaints Policy confirms this.  | Updated Complaints Policy to mirror Exclusion criteria.  |

|     | <ul> <li>reasonable to residents. Acceptable exclusions include:</li> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul> |     |   |   |
|-----|--|-----|---|---|
| 2.3 | Landlords must accept complaints referred<br>to them within 12 months of the issue<br>occurring or the resident becoming aware<br>of the issue, unless they are excluded on<br>other grounds. Landlords must consider<br>whether to apply discretion to accept<br>complaints made outside this time limit<br>where there are good reasons to do so.  | Yes | Section 5.5 of the Customer Relations<br>Procedure confirms this.   |   |
| 2.4 | If a landlord decides not to accept a<br>complaint, an explanation must be<br>provided to the resident setting out the<br>reasons why the matter is not suitable for<br>the complaints process and the right to<br>take that decision to the Ombudsman. If<br>the Ombudsman does not agree that the<br>exclusion has been fairly applied, the<br>Ombudsman may tell the landlord to take<br>on the complaint.  | Yes | A new rejected complaint template<br>will be sent to the resident in the<br>event of a complaint being rejected.<br>The letter will contain the reasons<br>for rejection along with the evidence<br>behind the decision. The letter will<br>contain contact information for the<br>Ombudsman. |   |
| 2.5 | Landlords must not take a blanket<br>approach to excluding complaints; they<br>must consider the individual circumstances  | Yes | Abri's Customer Relations Procedure confirms this.  | Section 5.7 states cases will<br>be considered on an<br>individual basis - 'If Abri has |

| of each com | plaint. | valid reason not to accept a  |
|-------------|---------|-------------------------------|
|             |         | complaint, or to deal with it |
|             |         | differently, we will be able  |
|             |         | to evidence the reasoning,    |
|             |         | and explain to the customer   |
|             |         | the reasons why the matter    |
|             |         | is not suitable for the       |
|             |         | complaints process or outline |
|             |         | how we are dealing with it    |
|             |         | and why, and the right to     |
|             |         | escalate the complaint,       |
|             |         | including to the Ombudsman    |
|             |         | Service.'                     |

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation  |
|-------------------|--|---------------------|---|---|
| 3.1               | Landlords must make it easy for residents<br>to complain by providing different channels<br>through which they can make a complaint.<br>Landlords must consider their duties under<br>the Equality Act 2010 and anticipate the<br>needs and reasonable adjustments of<br>residents who may need to access the<br>complaints process. | Yes                 | Abri have multiple channels for<br>residents to make a complaint.<br>Abri's Reasonable Adjustments<br>Policy and procedure provides<br>advice on how to support anyone<br>with a vulnerability that wishes to<br>make a complaint.<br>Section 8.1 of the Customer<br>Relations Procedure confirms Abri<br>make it's complaint process<br>accessible to all. | Equality Impact Assessment<br>has been reviewed to ensure<br>out channels reflect our<br>resident's needs. New<br>measures include having a<br>conversation with the<br>customer if their needs are<br>not identified on their current<br>files (on Open Housing). We<br>aim to use Language Line (LL)<br>across Abri. Language Line<br>provides services such as easy<br>read, larger fonts, or braille<br>for customers with specific<br>needs. Language Line will also<br>provide translation and<br>interpretation services<br>including sign language.<br>Abri's website has been<br>updated to clearly show the<br>different channels where the<br>customer can raise a<br>complaint.<br>Abri's offline complaint form<br>and complaint process |

# Section 3: Accessibility and Awareness

|     |  |     |   | information will be offered to<br>residents who are unable to<br>access online services.  |
|-----|--|-----|---|---|
| 3.2 | Residents must be able to raise their<br>complaints in any way and with any<br>member of staff. All staff must be aware of<br>the complaints process and be able to pass<br>details of the complaint to the appropriate<br>person within the landlord.   | Yes | Abri's Customer Relations Procedure<br>confirms this at section 3.1 and at<br>section 3.7 of the Complaints Policy.   | There is a dedicated Customer<br>Complaints/Customer<br>Relations Team Information<br>and Training page, accessible<br>for all Abri staff on Abri's<br>Internal Information page<br>called The Arc.<br>Further training for all |
|     | person within the landlord.  |     |   | new/existing staff members to<br>ensure there is a positive<br>complaints culture across the<br>organisation.   |
| 3.3 | High volumes of complaints must not be<br>seen as a negative, as they can be<br>indicative of a well-publicised and<br>accessible complaints process. Low<br>complaint volumes are potentially a sign<br>that residents are unable to complain.  | Yes | Abri are committed to providing a high quality, well-publicised and accessible complaints process.  | Wording will be added to the<br>footer of Governance reports<br>to reflect this new code and<br>that high volumes of<br>complaints must not be seen<br>as a negative.   |
| 3.4 | Landlords must make their complaint<br>policy available in a clear and accessible<br>format for all residents. This will detail the<br>two-stage process, what will happen at<br>each stage, and the timeframes for<br>responding. The policy must also be<br>published on the landlord's website. | Yes | Abri's Complaint Policy confirms<br>this at tab 3.8 and is available on<br>the Abri website.<br>The Customer Relations Procedure<br>confirms this at section 8.1. | Abri's Complaints Policy is<br>hosted on it's website, and<br>includes confirmation of the<br>Stages of Abri's internal<br>complaints process (ICP).  |
| 3.5 | The policy must explain how the landlord<br>will publicise details of the complaints<br>policy, including information about the  | Yes | Abri's Complaint Policy confirms this and is available on the website.  | Abri's Complaints Policy, the<br>Complaint Handling Code and<br>information on the Housing<br>Ombudsman Scheme are  |

|     | Ombudsman and this Code.                  | 1                                   | regularly montioned in  |
|-----|---|-------------------------------------|---|
|     | Umbudsman and this code.                  |                                     | regularly mentioned in  |
|     |   |                                     | customer correspondence,  |
|     |   |                                     | including newsletters, the                                      |
|     |   |                                     | annual report, and online.                                      |
|     |   |                                     | Abri's Customer Relations                                       |
|     |   |                                     | Procedure states: "2.3 To                                       |
|     |   |                                     | evidence compliance with the                                    |
|     |   |                                     | Housing Ombudsman Code,   |
|     |   |                                     | Abri will complete a Self-                                      |
|     |   |                                     | Assessment annually, at the                                     |
|     |   |                                     | end of the financial year. Abri                                 |
|     |   |                                     | -   |
|     |   |                                     | will also proactively complete<br>an assessment outside of this |
|     |   |                                     |   |
|     |   |                                     | schedule if significant changes                                 |
|     |   |                                     | are made to either the Code                                     |
|     |   |                                     | or our internal processes."                                     |
|     |   |                                     | In line with our Data   |
|     |   |                                     | Protection Guidelines, Abri will                                |
|     |   |                                     | need the resident to complete                                   |
|     |   |                                     | an Authority to Discuss (ATD)                                   |
|     |   |                                     | form, giving permission for any                                 |
|     |   |                                     | personal information to be                                      |
|     | Landlords must give residents the         |                                     | shared with a representative,                                   |
|     | opportunity to have a representative deal |                                     | unless they have Power of                                       |
| 3.6 | with their complaint on their behalf, and | Abri's Customer Relations Procedure | Attorney. Abri can talk to a                                    |
| 5.0 | to be represented or accompanied at any   | and Complaints Policy confirm this. | representative if the resident                                  |
|     | meeting with the landlord.                |                                     | is present at the time and                                      |
|     |   |                                     | gives verbal permission to                                      |
|     |   |                                     | discuss the complaint whilst                                    |
|     |   |                                     | they are together.  |
|     |   |                                     | The Completete Deline states                                    |
|     |   |                                     | The Complaints Policy states                                    |
|     |   |                                     | 'Should we receive a  |
|     |   |                                     | complaint via a representative                                  |

| 3.7 | Landlords must provide residents with<br>information on their right to access the<br>Ombudsman service and how the individual<br>can engage with the Ombudsman about<br>their complaint. | Yes | Abri's Customer Relations Procedure<br>and Complaints Policy confirms this. | or advocate, permission will<br>need to be provided by the<br>customer, where possible.'<br>Section 3.8 of Abri's<br>Complaints Policy states, We<br>will provide contact<br>information for the Housing<br>Ombudsman, or other relevant<br>Ombudsman service, as part of<br>the complaints process. We<br>are bound by the terms of the<br>Housing Ombudsman's scheme<br>and will fully co-operate will<br>all requests for information<br>made by the Ombudsman,<br>work with them in resolving<br>complaints effectively, and<br>adhere to recommendations<br>made to put things right.<br>This is also highlighted in<br>section 24 of Abri's Customer<br>Relations Procedure. |
|-----|--|-----|---|--|
|-----|--|-----|---|--|

# Section 4: Complaint Handling Staff

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation   |
|-------------------|--|---------------------|---|--|
| 4.1               | Landlords must have a person or team<br>assigned to take responsibility for<br>complaint handling, including liaison with<br>the Ombudsman and ensuring complaints<br>are reported to the governing body (or<br>equivalent). This Code will refer to that<br>person or team as the 'complaints officer'.<br>This role may be in addition to other<br>duties. | Yes                 | Abri's Customer Relations Procedure<br>cites the Customer Relations Team<br>as the responsible team assigned to<br>take responsibility for complaint<br>handling, and the Executive<br>Director for Operations as<br>responsible for ensuring complaints<br>are reported to the governing body.<br>In addition to this, Abri have a<br>dedicated HOS liaison team that<br>deal with HOS Investigation<br>requests from the HOS in a<br>professional and timely manner.  | There are ongoing discussions<br>about where the functional<br>ownership of this Ombudsman<br>team will sit.   |
| 4.2               | The complaints officer must have access to<br>staff at all levels to facilitate the prompt<br>resolution of complaints. They must also<br>have the authority and autonomy to act to<br>resolve disputes promptly and fairly.   | Yes                 | As outlined in section 14.1 of the<br>Customer Relations Procedure, the<br>Complaints Officer will work with<br>relevant teams or departments<br>within Abri to investigate all aspects<br>of the customer's complaint. Whilst<br>teams, departments, and colleagues<br>at all levels may be asked for input,<br>it is the role of the Complaint<br>Officers to come to an independent<br>and fair outcome to the complaint,<br>and to decide what action, if any,<br>we should take to put things right<br>for our customer. | Redress authorisation limits<br>have been reviewed on 4<br>March 2024 to ensure that<br>complaints officers have the<br>authority to resolve disputes<br>promptly and fairly, without<br>the need for higher level<br>approval for a majority of<br>cases. |
| 4.3               | Landlords are expected to prioritise   | Yes                 |   | In addition to this, Abri have   |

| complaint handling and a culture of          | Abri have a robust recruitment plan | launched its Housing            |
|--|-------------------------------------|---------------------------------|
| learning from complaints. All relevant staff | to ensure our stage 1 and stage 2   | Professional of the Future      |
| must be suitably trained in the importance   | complaint teams are resourced to    | scheme. This supports           |
| of complaint handling. It is important that  | meet the expected level of          | everyone at Abri, regardless of |
| complaints are seen as a core service and    | demand, with room for resilience to | their role, to connect to why   |
| must be resourced to handle complaints       | meet demand from seasonal peaks     | we're here, what we do as a     |
| effectively                                  | and troughs in complaints.          | housing association and why     |
|  |                                     | it's important. The relaunch    |
|  |                                     | also supports the Social        |
|  |                                     | Housing (Regulation) Act 2023.  |
|  |                                     | The Act offers greater          |
|  |                                     | protection to social housing    |
|  |                                     | tenants in their homes,         |
|  |                                     | ensuring a better service and   |
|  |                                     | quality of life. The Housing    |
|  |                                     | Management module of this       |
|  |                                     | scheme provides links to        |
|  |                                     | Complaint information,          |
|  |                                     | including the Ombudsman's       |
|  |                                     | own e-learning modules.         |
|  |                                     |                                 |
|  |                                     | Abri has put in place a         |
|  |                                     | Framework Agreement for the     |
|  |                                     | provision of services that can  |
|  |                                     | support the staffing            |
|  |                                     | requirements across the Abri    |
|  |                                     | Group. Abri seeks to work with  |
|  |                                     | suitably experienced            |
|  |                                     | Recruitment Agencies to         |
|  |                                     | consistently provide            |
|  |                                     | professional levels of          |
|  |                                     | performance and conduct         |
|  |                                     | whilst meeting the temporary,   |
|  |                                     | permanent and fixed term        |
|  |                                     | •                               |
|  |                                     | staffing requirements with top  |

| quality candidates. Through<br>tender, suppliers evidence that<br>they can deliver high quality<br>control and effective<br>monitoring providing services<br>across the Abri Group and its<br>operational areas, and meet<br>all the requirements of<br>legislation and employment<br>law including that relating to<br>equal opportunities and anti-<br>discrimination practice.Abri has a dedicated complaint<br>handling lot on it's Framework<br>Agreement, allowing for the<br>provision of complaint<br>handling services at peak<br>operating periods or times |
|---|
| where additional resource is<br>required. This includes:<br>Complaint Handler, Complaint<br>Officer, Complaints Manager,<br>Complaints Team Leader.   |
|   |

Section 5: The Complaint Handling Process

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence                               | Commentary / explanation |
|-------------------|--|---------------------|--|--------------------------|
| 5.1               | Landlords must have a single policy in place for dealing with complaints covered | Yes                 | Abri's Complaint Policy confirms this. |                          |

|     | by this Code. Residents must not be treated differently if they complain.   |     |   |  |
|-----|---|-----|---|--|
| 5.2 | The early and local resolution of issues<br>between landlords and residents is key to<br>effective complaint handling. It is not<br>appropriate to have extra named stages<br>(such as 'stage 0' or 'informal complaint')<br>as this causes unnecessary confusion.                                  | Yes | Abri have a clearly defined two-<br>stage complaint process, which is<br>confirmed within the Complaints<br>Policy and Customer Relations<br>Procedure. When the customer<br>expresses dissatisfaction, they are<br>offered the opportunity to pursue a<br>service request via our Local<br>Resolution route or raise a formal<br>complaint, as outlined in Abri's<br>Customer Relations Procedure. |  |
| 5.3 | A process with more than two stages is not<br>acceptable under any circumstances as this<br>will make the complaint process unduly<br>long and delay access to the Ombudsman.   | Yes | Abri have a clearly defined two-<br>stage complaint process, which is<br>confirmed within the Complaints<br>Policy and Customer Relations<br>Procedure. When the customer<br>expresses dissatisfaction, they are<br>offered the opportunity to pursue a<br>service request via our Local<br>Resolution route or raise a formal<br>complaint, as outlined in Abri's<br>Customer Relations Procedure. | Abri does not have a 3-stage<br>complaint process. |
| 5.4 | Where a landlord's complaint response is<br>handled by a third party (e.g. a contractor<br>or independent adjudicator) at any stage,<br>it must form part of the two stage<br>complaints process set out in this Code.<br>Residents must not be expected to go<br>through two complaints processes. | Yes | Any complaint response handled by<br>a third party will be part of Abri's<br>two-stage complaint process, as<br>outlined in our Complaints Policy<br>and Customer Relations Procedure.<br>Any contractors will be provided<br>with full training in Abri's Complaint<br>Handling process and will be<br>subject to the same quality controls  |  |

|     |   |     | and checking we have for all<br>Complaint Officers.  |   |
|-----|---|-----|--|---|
| 5.5 | Landlords are responsible for ensuring that<br>any third parties handle complaints in line<br>with the Code.  | Yes | Any third parties will be provided<br>with full training in Abri's Complaint<br>Handling process and will be<br>subject to the same quality controls<br>and checking we have for all<br>Complaint Officers. Any complaint<br>response handled by a third party<br>on behalf of Abri, will be in line<br>with the code. |   |
| 5.6 | When a complaint is logged at Stage 1 or<br>escalated to Stage 2, landlords must set<br>out their understanding of the complaint<br>and the outcomes the resident is seeking.<br>The Code will refer to this as "the<br>complaint definition". If any aspect of the<br>complaint is unclear, the resident must be<br>asked for clarification. | Yes | The Customer Relations team<br>documents including Quality<br>Checking scorecard and<br>Investigation Reports have been<br>updated to reflect the new<br>terminology 'The Complaint<br>Definition.'  | The Quality Checking<br>scorecard will also check that<br>as part of the complaint<br>acknowledgment, the<br>Complaint Officer has<br>attempted to clarify the<br>complaint definition and<br>understand the outcomes the<br>resident is seeking. |
| 5.7 | When a complaint is acknowledged at<br>either stage, landlords must be clear which<br>aspects of the complaint they are, and are<br>not, responsible for and clarify any areas<br>where this is not clear.  | Yes | Abri's Customer Relations Procedure<br>confirms this. Wording has been<br>amended at tab 13.2.   | 5   |
| 5.8 | <ul> <li>At each stage of the complaints process, complaint handlers must: <ul> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of</li> </ul> </li> </ul> | Yes | Abri's Customer Relations Procedure confirms this at tab 14.1.   |   |

|      | interest; and<br>d. consider all relevant information<br>and evidence carefully.   |     |   |   |
|------|--|-----|---|---|
| 5.9  | Where a response to a complaint will fall<br>outside the timescales set out in this Code,<br>the landlord must agree with the resident<br>suitable intervals for keeping them<br>informed about their complaint.   | Yes | Abri's Customer Relations Procedure<br>confirms this at tab 10.3 and 17.1.<br>Quality Checking scorecard to check<br>for appropriate contact. Any<br>extension beyond the original<br>timescales for stage 1 and stage 2<br>complaint handling will be<br>communicated with the resident by<br>writing. |   |
| 5.10 | Landlords must make reasonable<br>adjustments for residents where<br>appropriate under the Equality Act 2010.<br>Landlords must keep a record of any<br>reasonable adjustments agreed, as well as<br>a record of any disabilities a resident has<br>disclosed. Any agreed reasonable<br>adjustments must be kept under active<br>review. | Yes | Abri's Reasonable Adjustments<br>Policy confirms this.  | Abri's Reasonable Adjustments<br>Policy and Procedure provides<br>advice on how to support<br>anyone with a vulnerability<br>that wishes to make a<br>complaint.<br>Vulnerability Markers will be<br>clearly marked for conditions<br>like dyslexia for ensuring we<br>don't write to customers if<br>they want to be<br>communicated by other<br>means. Using a non-chemical<br>type of mould wash for an<br>asthmatic etc. Any disability<br>raised by the customer will<br>need to be taken into<br>consideration but any longer-<br>term flags wilk need to be<br>sent to Housing to be |

|      |  |     |  | evaluated in line with the<br>Customer Indicators<br>Procedure.<br>Abri will be working to ensure<br>the Language Line service is<br>used across Abri. Language<br>Line will provide services such<br>as easy read, larger fonts, or<br>braille for customers with<br>specific needs. Language Line<br>will also provide translation<br>and interpretation services<br>including sign language. |
|------|--|-----|--|---|
| 5.11 | Landlords must not refuse to escalate a<br>complaint through all stages of the<br>complaints procedure unless it has valid<br>reasons to do so. Landlords must clearly<br>set out these reasons, and they must<br>comply with the provisions set out in<br>section 2 of this Code.                               | Yes | Abri's Customer Relations Procedure<br>confirms Abri's process. The<br>exceptional reasons why a stage 2<br>escalation may be refused are listed<br>at tab 22.2. This would need the<br>consent of the Executive Director<br>for Operations and the Head of<br>Change and Service Improvement. |   |
| 5.12 | A full record must be kept of the<br>complaint, and the outcomes at each<br>stage. This must include the original<br>complaint and the date received, all<br>correspondence with the resident,<br>correspondence with other parties, and<br>any relevant supporting documentation<br>such as reports or surveys. | Yes | Abri's Customer Relations Procedure<br>confirms this at tab 14.3.  | Abri use a single system to<br>record all correspondence and<br>documentation for each<br>complaint, including the<br>outcomes at each stage and<br>the original complaint.   |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any  | Yes | Abri's Complaints Process confirms this.   |   |

|      | stage of its complaints process. Landlords<br>must ensure appropriate remedies can be<br>provided at any stage of the complaints<br>process without the need for escalation.  |     |  |  |
|------|---|-----|--|--|
| 5.14 | Landlords must have policies and<br>procedures in place for managing<br>unacceptable behaviour from residents<br>and/or their representatives. Landlords<br>must be able to evidence reasons for<br>putting any restrictions in place and must<br>keep restrictions under regular review. | Yes | Abri's Unacceptable Behaviour<br>Policy confirms this. |  |
| 5.15 | Any restrictions placed on contact due to<br>unacceptable behaviour must be<br>proportionate and demonstrate regard for<br>the provisions of the Equality Act 2010.   | Yes | Abri's Unacceptable Behaviour<br>Policy confirms this. |  |

## Section 6: Complaints Stages

## <u>Stage 1</u>

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation  |
|-------------------|--|---------------------|---|---|
| 6.1               | Landlords must have processes in place to<br>consider which complaints can be<br>responded to as early as possible, and<br>which require further investigation.<br>Landlords must consider factors such as the<br>complexity of the complaint and whether<br>the resident is vulnerable or at risk. Most<br>stage 1 complaints can be resolved<br>promptly, and an explanation, apology or<br>resolution provided to the resident. | Yes                 | Abri's Customer Relations<br>Administration team have a robust<br>triaging process in place, to identify<br>which cases involve a certain<br>amount of complexity and which<br>don't, taking into consideration a<br>resident's vulnerability and high-risk<br>factors such as any building under<br>the Buildings Safety Act. The<br>triaging process is optimised to pick<br>out complaints that can and should<br>be responded to quickly. |   |
| 6.2               | Complaints must be acknowledged, defined<br>and logged at stage 1 of the complaints<br>procedure within five working days of the<br><u>complaint being received</u> .  | Yes                 | Abri's Customer Relations Procedure confirms this.  | Abri aim to acknowledge all<br>complaints within two working<br>days. |
| 6.3               | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.   | Yes                 | Abri's Customer Relations Procedure confirms this.  |   |
| 6.4               | Landlords must decide whether an<br>extension to this timescale is needed when<br>considering the complexity of the<br>complaint and then inform the resident of<br>the expected timescale for response. Any<br>extension must be no more than 10<br>working days without good reason, and the   | Yes                 | Abri's Customer Relations Procedure confirms this.  |   |

|     | reason(s) must be clearly explained to the resident.   |     |   |  |
|-----|--|-----|---|--|
| 6.5 | When an organisation informs a resident<br>about an extension to these timescales,<br>they must be provided with the contact<br>details of the Ombudsman.  | Yes | Ombudsman details are provided on<br>the holding/extension letter sent to<br>the customer in such circumstances.  |  |
| 6.6 | A complaint response must be provided to<br>the resident when the answer to the<br>complaint is known, not when the<br>outstanding actions required to address the<br>issue are completed. Outstanding actions<br>must still be tracked and actioned<br>promptly with appropriate updates<br>provided to the resident.   | Yes | Abri's Customer Relations team<br>work closely with the wider<br>business and relevant departments<br>to ensure outstanding actions are<br>tracked through to completion and<br>residents are appropriately<br>updated. | We will soon have the<br>capability to use the OH<br>system to log and track follow<br>on actions from complaints.<br>We currently use our<br>Sharepoint page/spreadsheets<br>to track follow on actions to<br>ensure visibility and awareness<br>and enable prompts to be<br>given to ensure actions are<br>followed through. |
| 6.7 | Landlords must address all points raised in<br>the complaint definition and provide clear<br>reasons for any decisions, referencing the<br>relevant policy, law and good practice<br>where appropriate.  | Yes | Investigation Reports contain the complaint definition and reasons for the decisions made.  | Referencing policy, law and<br>good practice be added to the<br>Quality Checking scorecard.  |
| 6.8 | Where residents raise additional<br>complaints during the investigation, these<br>must be incorporated into the stage 1<br>response if they are related and the stage<br>1 response has not been issued. Where the<br>stage 1 response has been issued, the new<br>issues are unrelated to the issues already<br>being investigated or it would unreasonably<br>delay the response, the new issues must be<br>logged as a new complaint. | Yes | Abri's Customer Relations Procedure<br>confirms this. Wording updated at<br>tab 8.6.  |  |

| 6.9 | Landlords must confirm the following in<br>writing to the resident at the completion<br>of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions<br>made;<br>e. the details of any remedy offered<br>to put things right;<br>f. details of any outstanding actions;<br>and<br>g. details of how to escalate the<br>matter to stage 2 if the individual is<br>not satisfied with the response. | Yes | Abri's Customer Relations Procedure<br>confirms this. | Abri have a standard template<br>for all stage 1 complaint<br>responses that contains this<br>information. The stage 1<br>complaint responses are also<br>subject to a detailed quality<br>checking process. |
|-----|---|-----|---|--|
|-----|---|-----|---|--|

# <u>Stage 2</u>

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence   | Commentary / explanation  |
|-------------------|--|---------------------|--|---|
| 6.10              | If all or part of the complaint is not<br>resolved to the resident's satisfaction at<br>stage 1, it must be progressed to stage 2 of<br>the landlord's procedure. Stage 2 is the<br>landlord's final response. | Yes                 | Abri's Complaints Procedure confirms this.   |   |
| 6.11              | Requests for stage 2 must be<br>acknowledged, defined and logged at stage<br>2 of the complaints procedure within five<br>working days of the escalation request<br>being received.                            | Yes                 | Abri's Complaints Procedure confirms this.   | Abri aim to acknowledge all<br>complaints within two working<br>days. |
| 6.12              | Residents must not be required to explain<br>their reasons for requesting a stage 2<br>consideration. Landlords are expected to<br>make reasonable efforts to understand why                                   | Yes                 | Abri's Complaints Procedure<br>confirms this. Wording has been<br>amended at tab 22.1. |   |

|      | a resident remains unhappy as part of its 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 | Abri's Complaints Procedure confirms this.  |   |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.   | Yes | Abri's Complaints Procedure<br>confirms this. Wording has been<br>amended to reflect the new<br>timescales at tab 22.4.   |   |
| 6.15 | Landlords must decide whether an<br>extension to this timescale is needed when<br>considering the complexity of the<br>complaint and then inform the resident of<br>the expected timescale for response. Any<br>extension must be no more than 20<br>working days without good reason, and the<br>reason(s) must be clearly explained to the<br>resident. | Yes | Abri's Complaints Procedure<br>confirms this. Wording has been<br>amended to reflect the new<br>extension limit from 10 to 20 days<br>at tab 22.4   |   |
| 6.16 | When an organisation informs a resident<br>about an extension to these timescales,<br>they must be provided with the contact<br>details of the Ombudsman.   | Yes | Ombudsman details are provided on<br>the holding/extension letter sent to<br>the customer in such circumstances   |   |
| 6.17 | A complaint response must be provided to<br>the resident when the answer to the<br>complaint is known, not when the<br>outstanding actions required to address the<br>issue are completed. Outstanding actions<br>must still be tracked and actioned<br>promptly with appropriate updates<br>provided to the resident.                                    | Yes | Abri's Customer Relations team<br>work closely with the wider<br>business and relevant departments<br>to ensure outstanding actions are<br>tracked through to completion and<br>residents are appropriately<br>updated. | We will soon have the<br>capability to use the Open<br>Housing system to log and<br>track follow on actions from<br>complaints.<br>We currently use our<br>Sharepoint page/spreadsheets<br>to track follow on actions to<br>ensure visibility and awareness<br>and enable prompts to be<br>given to ensure actions are<br>followed through. |

| 6.18 | Landlords must address all points raised in<br>the complaint definition and provide clear<br>reasons for any decisions, referencing the<br>relevant policy, law and good practice<br>where appropriate.  | Yes | Abri's Customer Relations Procedure confirms this.    |  |
|------|--|-----|---|--|
| 6.19 | <ul> <li>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> </ul> </li> <li>e. the details of any remedy offered to put things right; <ul> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> </li> </ul> | Yes | Abri's Customer Relations Procedure<br>confirms this. | Abri have a standard template<br>for all stage 2 complaint<br>responses that contains this<br>information. The stage 2<br>complaint responses are also<br>subject to a detailed quality<br>checking process. |
| 6.20 | Stage 2 is the landlord's final response and<br>must involve all suitable staff members<br>needed to issue such a response.  | Yes | Abri's Customer Relations Procedure confirms this.    |  |

## Section 7: Putting things right

| Code<br>provision | Code requirement  | Comply:<br>Yes / No | Evidence   | Commentary / explanation |
|-------------------|---|---------------------|--|--------------------------|
| 7.1               | Where something has gone wrong a<br>landlord must acknowledge this and set out<br>the actions it has already taken, or intends<br>to take, to put things right. These can<br>include: | Yes                 | Abri's Putting Things Right<br>Guidelines detail Abri's approach to<br>redress and remedies. |                          |

|     | <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> <li>Changing policies, procedures or practices.</li> </ul> |     |  |  |
|-----|---|-----|--|--|
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes | Abri's Putting Things Right<br>Guidelines detail Abri's approach to<br>redress and remedies. |  |
| 7.3 | The remedy offer must clearly set out what<br>will happen and by when, in agreement<br>with the resident where appropriate. Any<br>remedy proposed must be followed through<br>to completion.   | Yes | Abri's Putting Things Right<br>Guidelines detail Abri's approach to<br>redress and remedies. |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | Abri's Putting Things Right<br>Guidelines detail Abri's approach to<br>redress and remedies. |  |

# 8. Self-assessment, reporting and compliance

| Code<br>provision | Code requirement  | Comply:<br>Yes / No | Evidence  | Commentary / explanation   |
|-------------------|---|---------------------|---|--|
| 8.1               | Landlords must produce an annual<br>complaints performance and service<br>improvement report for scrutiny and<br>challenge, which must include:<br>a. the annual self-assessment against<br>this Code to ensure their complaint<br>handling policy remains in line with its<br>requirements.<br>b. a qualitative and quantitative<br>analysis of the landlord's complaint<br>handling performance. This must also<br>include a summary of the types of<br>complaints the landlord has refused to<br>accept;<br>c. any findings of non-compliance with<br>this Code by the Ombudsman;<br>d. the service improvements made as<br>a result of the learning from complaints;<br>e. any annual report about the<br>landlord's performance from the<br>Ombudsman; and<br>f. any other relevant reports or<br>publications produced by the Ombudsman<br>in relation to the work of the landlord. | Yes                 | We complete an annual self-<br>assessment against the Housing<br>Ombudsman's complaint code and<br>publish a copy of this on our<br>website.<br>We are complaint with the Housing<br>Ombudsman code and therefore we<br>have not been required to report<br>non-compliance.<br>Included in our annual report we<br>include a section on our complaints<br>handling and performance. This<br>report is published on our website. | <i>An</i> annual complaints<br>performance and service<br>improvement report to be<br>created. |
| 8.2               | The annual complaints performance and<br>service improvement report must be<br>reported to the landlord's governing body<br>(or equivalent) and published on the  | Yes                 | This is reflected in the Customer<br>Relations Procedure.<br>Included in our annual report we   |  |

|     | section of its website relating to<br>complaints. The governing body's response<br>to the report must be published alongside<br>this.  |     | include a section on our complaint's<br>performance, this includes lessons<br>learnt from our complaints and<br>service improvements as a result.<br>This report is published on our<br>website.   |                     |
|-----|--|-----|--|---------------------|
| 8.3 | Landlords must also carry out a self-<br>assessment following a significant<br>restructure, merger and/or change in<br>procedures.   | Yes | This is reflected in the Customer<br>Relations Procedure.  | Section 2.3 details |
| 8.4 | Landlords may be asked to review and<br>update the self-assessment following an<br>Ombudsman investigation.  | Yes | <ul> <li>This is reflected in the Customer<br/>Relations Procedure.</li> <li>We have not received a request to<br/>review and update the self-<br/>assessment following an<br/>Ombudsman investigation.</li> <li>If such a request is made, we will<br/>promptly undertake the review and<br/>update within specified<br/>timeframes.</li> </ul> |                     |
| 8.5 | If a landlord is unable to comply with the<br>Code due to exceptional circumstances,<br>such as a cyber incident, they must inform<br>the Ombudsman, provide information to<br>residents who may be affected, and<br>publish this on their website Landlords<br>must provide a timescale for returning to<br>compliance with the Code. | Yes | This is reflected in the Customer<br>Relations Procedure, and the<br>functional Business Continuity plan<br>confirms this.   |                     |

|                     | _    |            |            |          | 10 A 10 | •           |
|---------------------|------|------------|------------|----------|---------|-------------|
| Section 9: Scruting | / 81 | oversight: | continuous | learning | and     | improvement |
|                     |      |            |            |          |         |             |

| Code<br>provision | Code requirement   | Comply:<br>Yes / No | Evidence  | Commentary / explanation   |
|-------------------|--|---------------------|---|--|
| 9.1               | Landlords must look beyond the<br>circumstances of the individual complaint<br>and consider whether service<br>improvements can be made as a result of<br>any learning from the complaint.   | Yes                 | Abri have a dedicated Change and<br>Service Improvement Department,<br>who review complaints, provide<br>feedback and ensure positive<br>Service Improvements are made<br>when required.  | We note learnings in the<br>letters and provide feedback<br>to relevant teams.<br>Have a dedicated change and<br>service improvement<br>department.  |
| 9.2               | A positive complaint handling culture is<br>integral to the effectiveness with which<br>landlords resolve disputes. Landlords must<br>use complaints as a source of intelligence<br>to identify issues and introduce positive<br>changes in service delivery.          | Yes                 | The themes and trends in<br>complaints received to Abri are<br>shared with the 3 key customer<br>facing directorates in Abri on a<br>monthly basis, highlighting<br>systematic issues, risks, and P+Ps<br>requiring revision.       | Abri have two Root Cause<br>Analysts, who have received<br>the LEAN accreditation in<br>yellow and green belt. They<br>use complaints data to<br>identify and drive positive<br>change in service delivery.  |
| 9.3               | Accountability and transparency are also<br>integral to a positive complaint handling<br>culture. Landlords must report back on<br>wider learning and improvements from<br>complaints to stakeholders, such as<br>residents' panels, staff and relevant<br>committees. | Yes                 | Complaints themes and learnings<br>are reported in Abri's Annual Report,<br>and more frequently to involved<br>customer groups (quarterly),<br>customer facing directorates<br>(monthly), and Abri's Scrutiny Group<br>(quarterly). | Abri hold a quarterly<br>Resident's Scrutiny Meetings.<br>Abri have a Power Bi<br>dashboard is available to<br>relevant departments,<br>enabling them to view and<br>track complaints within their<br>areas.<br>Customer journey mapping<br>and case studies are<br>completed by our Root Cause<br>Analysts to ensure business<br>wide accountability. |
| 9.4               | Landlords must appoint a suitably senior   | Yes                 | The accountability of this  | Abri have a dedicated  |

| lead person as accountable for their<br>complaint handling. This person must<br>assess any themes or trends to identify<br>potential systemic issues, serious risks, or<br>policies and procedures that require<br>revision.   |     | department falls under the Head of<br>Complaints and Assurance.  | Customer Relations team<br>consisting of Complaint<br>Officers and Senior Complaint<br>Officers. |
|--|-----|--|--|
| <ul> <li>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').</li> </ul>   | Yes | Executive Director for Operations is<br>Abri's Member Responsible for<br>Complaints.   |  |
| <ul> <li>9.6 The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.</li> </ul>   | Yes | The MRC provides comprehensive<br>information and reports to our<br>governing body (group board),<br>offering detailed insights into<br>complaints handling performance. |  |
| <ul> <li>As a minimum, the MRC and the governing body (or equivalent) must receive: <ul> <li>a. regular updates on the volume,</li> <li>categories and outcomes of complaints, alongside complaint handling performance;</li> </ul> </li> <li>9.7 b. regular reviews of issues and trends arising from complaint handling; <ul> <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> </ul> </li> </ul> | Yes |  |  |

| 9.8 | d. annual complaints performance and<br>service improvement report.<br>Landlords must have a standard objective<br>in relation to complaint handling for all<br>relevant employees or third parties that<br>reflects the need to:<br>a. have a collaborative and co-<br>operative approach towards resolving<br>complaints, working with colleagues across<br>teams and departments; | Yes | Section 3.2 of the Customer<br>Relations Procedure confirms this | Abri also has a standard<br>objective in relation to<br>complaint handling for all<br>relevant staff (including third<br>parties) that reflects the need<br>to:<br>have a collaborative and co-<br>operative approach towards<br>resolving complaints, working<br>with colleagues across teams<br>and departments; |
|-----|--|-----|--|--|
| 9.8 | <ul> <li>b. take collective responsibility for<br/>any shortfalls identified through<br/>complaints, rather than blaming others;<br/>and</li> <li>c. act within the professional<br/>standards for engaging with complaints as<br/>set by any relevant professional body.</li> </ul>   | Yes | Relations Procedure confirms this                                | and departments;<br>take collective responsibility<br>for any shortfalls identified<br>through complaints, rather<br>than blaming others; and<br>act within the professional<br>standards for engaging with<br>complaints as set by any<br>relevant professional body.   |