



Revision Timetable

Review date	Reviewed by	Approved by
July 2020	Nazmul Ahmed. AD, Business Support	Services Committee Aug 2020
April 2022	Nazmul Ahmed. AD, Business Support	Services Committee June 2022
May 2023	Nazmul Ahmed. AD, Business Support	Services Committee June 2023
July 2023	Nazmul Ahmed. AD, Business Support	Services Committee Sept 2023

Introduction

The Housing Ombudsman introduced the Complaints Handling Code in July 2020 which sets out good practice for landlords to deal with complaints effectively and fairly. In 2022, the Ombudsman under new powers, updated its Code which came into effect on 1 April 2022. Landlords must carry out an annual assessment against the Code and publish the results.

Useful information

Customer Care & Complaints Policy Complaints Procedure Housing Ombudsman Service

	1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	As set out in Customer Care & Complaints Policy.
	1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's Customer Care & Complaints Policy.	Yes	Staff trained to capture, log, and respond accordingly. Awareness materials are circulated including reminders at team meetings
requirements	1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	All logged and acknowledged as a complaint.
equire	1.7	A landlord must accept a complaint unless there is a valid reason not	Yes	As set out in Customer Care & Complaints Policy.
, musť r		to do so.		Exclusions defined to stop channel-hopping; avoid complicating/confounding legal proceedings; and restrict to matters over which Poplar HARCA has control.
Mandatory	1.8	A Customer Care & Complaints Policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Exclusions:
Mand				a. A request which PH has not previously had an opportunity to respond to
				b. Can reasonably be decided by an alternative process
				c. Happened more than six months ago
				d. Has been referred for legal proceedings
				e. Is about a third party over which PH has no control
				f. Is about compliance with a law or regulation
				g. Is about PH as an employer
				h. Is about something which was previously subject to a

		code requirement	comply	evidence, commentary, and any explanations
				complaint, or was previously determined by a court, tribunal, or Ombudsman
				PH will explain why it considers a matter excluded from this policy, and provide information about alternative dispute resolution, including the Housing Ombudsman Service.
	1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	If excluded as a complaint, logged, and responded to as correspondence. Reason why not a complaint included in response, and explaining can approach Ombudsman.
' should' ments	1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Staff trained to capture, log, and respond accordingly.
Best practice 'sho requirements	1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Surveys include question about whether resident wants follow-up contact.

Section 2 - Accessibility and awareness

ndatory 'must' requirements	2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Variety of channels available: in-person, phone, text, portal, website, social media, letter, petition.
Manda	2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes	Yes	www.poplarharca.co.uk/about-us/complaints/ Hard copies can be sent, delivered, or talked through on demand.

	code requirement	comply	evidence, commentary, and any explanations
	for responding.		
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The Customer Care & Complaints Policy and process must be easy to find on the website.	Yes	www.poplarharca.co.uk/about-us/complaints/
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an	Yes	Staff and contractors receive training to identify safeguarding concerns and residents who need additional support.
	individual's needs. Landlords must satisfy themselves that their policy sets out how they		Dedicated Safeguarding Team to support and advocate for vulnerable and at-risk residents.
	will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.		Staff trained to signpost to variety of local independent advice and support.
			Authorised advocates can act for residents.
			Staff/contractor training includes exploring resident needs
			All policies undergo Equalities impact assessments.
			All staff attend mandatory EDI training
2.6	Landlords must publicise the Customer Care & Complaints Policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular	Yes	www.poplarharca.co.uk/about-us/complaints/ www.poplarharca.co.uk/about-us/complaints/housing- ombudsman/
	correspondence with residents.		Included in regular newsletters, and annual resident report.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Response top/tail template includes information including acknowledgement templates
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is	Yes	www.poplarharca.co.uk/about-us/complaints/ www.poplarharca.co.uk/about-us/complaints/housing- ombudsman/
	exhausted.		Response top/tail template includes information including acknowledgement templates
			Dedicated Customer Relations Team often act as 'honest broker'

		code requirement	comply	evidence, commentary, and any explanations
				and advise residents accordingly.
Best practice 'should' requirements	2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Comms Team, who manage social media channels, request contact details, and pass to the Complaints Team to follow-up using offline procedure. All staff have regular Data Protection training.

Section 3 - Complaint handling personnel

idatory' must' requirements	3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Dedicated Customer Relations Team with direct line to CEO and Corporate Management Team. Reports directly to Services Committee. Can independently commission 'expert' advice.
Mandatory require	3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Stage 1 complaint is responsibility of service manager. Stage 2 is managed by the Customer Relations Team. All staff have regular training and awareness briefings.
Best practice 'should' requirement	3.3	 Complaint handlers should: be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Stage 1 complaint is responsibility of service manager. Stage 2 is managed by the Customer Relations Team. All staff have regular training and awareness briefings; have access to senior colleagues; and can escalate any matter of concern at any stage.

Section 4 - Complaint handling principles

	code requirement	comply	evidence, commentary, and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Set out in Complaints Procedure. Logged on database upon receipt. Acknowledgement within 2 working days. Complaint responder required to contact complainant to understand issues, remedy sought, and agree on next steps.
requirements	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Complaint responder required to contact complainant to understand issues, remedy sought, and agree on next steps.
Mandatory ' must' re	A complaint investigation must be conducted in an impartial manner.	Yes	Reinforced in regular training/awareness sessions. Stage 1 complaint is responsibility of service manager. Stage 2 is managed by the Customer Relations Team; heard by senior staff and/or residents.
apuaW 4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions. Stage 1 complaint is responsibility of service manager. Stage 2 is managed by the Customer Relations Team; heard by senior staff and/or residents.
4.13	Landlords must adhere to any reasonable arrangements agreed with	Yes	Set out in Complaints Procedure.

		code requirement	comply	evidence, commentary, and any explanations
		residents in terms of frequency and method of communication		Reinforced in regular training/awareness sessions.
	4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: set out their position comment on any adverse findings before a final decision is made.	Yes	Complaint responder required to contact complainant to understand issues, remedy sought, and agree on next steps. Stage 2 includes right to meet the Panel. Involved staff set-out chronology and meet with complaint responder/ Panel.
	4.13	A landlord must include in its Customer Care & Complaints Policy its timescales for a resident to request escalation of a complaint	Yes	As set out in Customer Care & Complaints Policy
	4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's Customer Care & Complaints Policy and must be the same as the reasons for not accepting a complaint.	Yes	As set out in Customer Care & Complaints Policy. Exclusions defined to stop channel-hopping; avoid complicating/confounding legal proceedings; and restrict to matters over which Poplar HARCA has control.
	4.15	A full record must be kept of the complaint, any review, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	Logged on database.
	4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	As set out in Customer Care & Complaints Policy.
ice , ents	4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Reinforced in regular training/awareness sessions.
Best practice 'should' requirements	4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Timescales set out in Customer Care & Complaints Policy.

	code requirement	comply	evidence, commentary, and any explanations
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	As set out in the Customer Care & Complaints Policy
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Reinforced in regular training/awareness sessions.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Reinforced in regular training/awareness sessions.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Stage 1 is responsibility of service manager. Stage 2 is managed by the Customer Relations Team Reinforced in regular training/awareness sessions. Reinforced through lessons learnt and case reviews
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Specific question included in resident survey. Customer Relations Team follow-up on stage 2 complainants. Complaints review meetings capture lessons learned.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Complaints review meetings capture lessons learned. Customer Relations Team have direct access to CEO and Corporate Management Team. You said/we did captured for resident annual report.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Set out in Customer Care & Complaints Policy. Dedicated Safeguarding Team to support and advocate for vulnerable and at-risk residents.

Section 5 - Complaint stages

	5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Set out in Customer Care & Complaints Policy.
requirement Stage 1	5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Set out in Complaints Procedure. Complaints review meetings track actions. Complaint not closed on database until all outstanding actions completed. Reinforced in regular training/awareness sessions.
musť	5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions.
Mandatory '	5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • the complaint stage • 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 • details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions. Use of response templates

		code requirement	comply	evidence, commentary, and any explanations
	5.2	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.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions.
	5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	As set out in the Complaints Procedure Reinforced in regular training/awareness sessions.
ements	5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions.
Stage 2 Best practice 'should'requirements	5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	As set out in the Complaints Procedure Reinforced in regular training/awareness sessions.
	5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one, it must be progressed to stage two of the landlord's procedure unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Set out in Customer Care & Complaints Policy. Stage 2 managed by dedicated Customer Relations Team. Reinforced in regular training/awareness sessions.
	5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Stage 2 managed by dedicated Customer Relations Team who contact the complainant directly. Reinforced in regular training/awareness sessions.
	5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Set out in Customer Care & Complaints Policy.

		code requirement	comply	evidence, commentary, and any explanations
				Reinforced in regular training/awareness sessions.
	5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 1 complaint is responsibility of service manager. Stage 2 is managed by the Customer Relations Team; heard by senior staff and/or residents. Set out in Customer Care & Complaints Policy Set out in Complaints Procedure
	5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Set out in Customer Care & Complaints Policy.
	5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: • 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 • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions. Use of response templates
Best practice 'shoul d'	5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by	Yes	Set out in Complaints Procedure Reinforced in regular training/awareness sessions.

		code requirement	comply	evidence, commentary, and any explanations
		both parties.		
	5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	As set out in the Complaints Procedure Reinforced in regular training/awareness sessions.
	5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions.
	5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	As set out in the Complaints Procedure Reinforced in regular training/awareness sessions.
ould' ge 2	5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Set out in Complaints Procedure. Reinforced in regular training/awareness sessions.
Best practice′ should′ requirements Stage 2	5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	As set out in the Complaints Procedure Reinforced in regular training/awareness sessions.

Section 6 - Putting things right

ndat	ust	6.1	Effective dispute resolution requires a process designed to resolve	Yes	Set out in Complaints Procedure.
lan or	5 E .		complaints. Where something has gone wrong a landlord must		Reinforced in regular training/awareness sessions.
2	`		acknowledge this and set out the actions it has already taken, or		nemoreed in regular training/awareness sessions.

		code requirement	comply	evidence, commentary, and any explanations
		intends to take, to put things right.		
	6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Set out in Customer Care & Complaints Policy and Procedure. Reinforced in regular training/awareness sessions.
	6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Set out in Customer Care & Complaints Policy and Procedure. Reinforced in regular training/awareness sessions.
	6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Set out in Customer Care & Complaints Policy and Procedure. Reinforced in regular training/awareness sessions.
should' ents	6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Complaints review meetings capture lessons learned.
Best practice'sho requirements	6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	To protect complainant rights, Customer Care & Complaints Policy excludes matters which have alternative legal route. In practice, considered on a case-by-case basis; especially when supporting vulnerable and at-risk residents.

Section 7 - Continuous learning and improvement

		code requirement	comply	evidence, commentary, and any explanations
Mandatory 'must' requirements	7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutiny panels.	Yes	 Realtime performance: poplarharca.co.uk/about-us/our-performance/ Resident Annual Report: poplarharca.co.uk/about-us/who-we-are/policies-publications/category/annualreports/ Complaints: poplarharca.co.uk/about-us/complaints/service-improvement/ Quarterly reporting to Services Committee and Poplar Board Annual Report to Services Committee and Poplar Board Case studies in newsletters You said/we did in newsletters Lessons learned discussed with Estate Boards/Gatherings
requirements	7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Services Committee Chair is member of Poplar Board
Best practice 'should'requir	7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they 	Yes	Services Committee and Poplar Board receive:

	code requirement	comply	evidence, commentary, and any explanations
	 are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	 Corporate Management and Senior Leadership Teams receive: Quarterly performance reports, including HOS casework Annual overview report, including HOS casework Residents Annual Report Corporate Impact Report Self-assessment against: Complaint Handling Code HOS spotlight reports HOS annual/trend reports
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	Corporate values and behaviours, annual targets, and training materials all support, complement and encourage staff to improve complaints handling. Performance included on Team and Corporate meeting agendas. Reinforced in regular training/awareness sessions. Complaints review meetings capture lessons learned.

Section 8 - Self-assessment and compliance

Mandat ory ' must	8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its	Yes	Scheduled to be completed annually in May.	
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	code requirement	comply	evidence, commentary, and any explanations
	requirements.		
8.	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Scheduled to be completed by Business Support Team, including the Customer Relations Team.
8.	Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance	Yes	 Self-assessments: reported to Services Committee and Poplar Board. published on our website. promoted in Resident Annual Report