

## PH Self-Assessment

## Housing Ombudsman Complaints Handling Code

### 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          |
| March 2024   | Nazmul Ahmed. AD, Business Support           | Services Committee June 2024          |
| May 2025     | Kim Hayman, Head of Customer Services        | Services Committee June 2025          |
| August 2025  | Nazmul Ahmed, DD, Strategy                   | Services Committee, Sep 2025          |
| January 2026 | Nazmul Ahmed, Director of Corporate Services | Chair, Services Committee, March 2026 |
| May 2026     | Nazmul Ahmed, Director of Corporate Services | Chair, Services Committee, June 2026  |

### 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 2024, the Ombudsman, under new powers, updated its Code which came into effect on 1 April 2024. Landlords must carry out an annual assessment against the Code and publish the results.

### Useful information

[Customer Care & Complaints Policy.](#)

[Housing Ombudsman Service](#)

| code                                          | requirement                                                                                                                                                                                                                                                                                                                                           | comply? | evidence, commentary, and any explanations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>section 1 – definitions of a complaint</b> |                                                                                                                                                                                                                                                                                                                                                       |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1.2                                           | A complaint must be defined as: <i>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.</i>                                                                           | Yes     | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. ‘Section 3 – what will be logged as a complaint’</p> <p>Outlined in our Complaints section of the <a href="#">website</a> – ‘what is a complaint?’</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                                                                                                                                           |
| 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     | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. ‘Section 3 – what will be logged as a complaint’ and ‘Who can complain?’</p> <p>Outlined in our Complaints section of the <a href="#">website</a> – ‘what is a complaint?’</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Awareness materials are circulated including reminders at team meetings.</p> <p>Complaints submitted by third party or representatives are handled in line with our <a href="#">Customer Care &amp; Complaints Policy</a>.</p> |
| 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>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. ‘Section 3 – Service requests</p> <p>Outlined in our Complaints section of the <a href="#">website</a> – ‘what’s not a complaint?’</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                                                                                                                                                           |
| 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>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. ‘Section 3 – service requests’</p> <p>Outlined in our Complaints section of the <a href="#">website</a> – ‘what’s not a complaint?’</p> <p>Staff trained to identify and log service requests resulting in a complaint.</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                                                                      |

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| 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 | Survey responses are analysed individually. Where dissatisfaction is evident, contact is made with the complainant when the complainant has consented to contact. If a person wishes to make a complaint, this will be logged as such.                                                                                                                                                                                                                                                                                                                                         |
| <b>section 2 - exclusions</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 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 | <p>As set out in <a href="#">Customer Care &amp; Complaints Policy</a>. 'Section 3 - what won't be logged as a complaint'</p> <p>Exclusions are also found on our website under <a href="#">'What's not a complaint'</a></p> <p>Exclusions mirror HOS policy.</p> <p>Customer Relations Team triage individual complaints against the policy.</p>                                                                                                                                                                                                                              |
| 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"> <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> | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a> 'Section 3 – what will be logged as a complaint' and 'what won't be logged as a complaint'.</p> <p>Exclusions are also found on our website under <a href="#">'What's not a complaint'</a></p> <p>The substance and circumstance of each complaint will be considered on its merits against the policy</p> <p>PH will explain a decision to exclude a complaint from its formal process, and provide information about alternative dispute resolution, including the Housing Ombudsman Service.</p> |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 3 – what will be logged as a complaint' and 'what won't be logged as a complaint'.</p> <p>Exclusions can also be found on our website under <a href="#">'What's not a complaint'</a></p> <p>The substance and circumstance of each complaint will be considered on its merits against the policy</p>                                                                                                                                                                                      |

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|                                                |                                                                                                                                                                                                                                                                                                                                                                                    |     | PH will explain a decision to exclude a complaint from its formal process, and provide information about alternative dispute resolution, including the Housing Ombudsman Service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 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 | <p>As per <a href="#">Customer Care &amp; Complaints Policy</a>. – ‘Section 3 – what won’t be logged as a complaint’.</p> <p>If exclusion policy is exercised, matter is logged and responded to as correspondence. Reasons included in response with details of how to contact the Ombudsman to review the decision. The decision is logged on our database.</p> <p>This is also outlined on our website under <a href="#">‘What’s not a complaint’</a></p>                                                                                                                                                                                                                                                                                            |
| 2.5                                            | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.                                                                                                                                                                                                                                             | Yes | <p>As per <a href="#">Customer Care &amp; Complaints Policy</a></p> <p>Each complaint is considered against the policy.</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>section 3 – accessibility and awareness</b> |                                                                                                                                                                                                                                                                                                                                                                                    |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 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>As per <a href="#">Customer Care &amp; Complaints Policy</a>. – ‘Section 3 – who can complain?’</p> <p>This can also be found on our website under <a href="#">‘What is a complaint?’</a></p> <p>All channels acceptable: in-person, phone, text, portal, website, social media, letter, petition.</p> <p>The Team also calls or arranges meeting to capture complaints.</p> <p>Representatives can make complaints when authorised by the complainant. As per <a href="#">Customer Care &amp; Complaints Policy</a></p> <p>Staff/contractor training includes taking into consideration complainant needs.</p> <p>All policies undergo Equalities impact assessments.</p> <p>All staff attend mandatory EDI training, and staff and contractors</p> |
| 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 | <p>As per <a href="#">Customer Care &amp; Complaints Policy</a>. – ‘Section 3 – who can complain?’</p> <p>This can also be found on our website under <a href="#">‘What is a complaint?’</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|     |                                                                                                                                                                                                                                                                                  |     | <p>Reinforced in regular training/awareness sessions</p> <p>Complaints are regularly passed on by the teams to the corporate complaints mailbox.</p>                                                                                                                                                                                                                                                                                                                                                                                   |
| 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 | <p>Complaints are increasing year on year.</p> <p>Complaints are monitored and reported periodically</p> <p>Complaints are benchmarked with peers locally (Tower Hamlets Housing Forum) and nationally (Customer First Club) to identify trends.</p> <p>Complaints Annual Report will be available on our website from September each year. TSM information will also be available on the website from September each year.</p>                                                                                                        |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>, 'Section 2 – our commitment'.</p> <p>Policy on website <a href="#">Customer Care &amp; Complaints Policy</a></p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Hard copies can be sent, delivered, or talked through on request, or when identified as preferable.</p> <p>Information also circulated in regular newsletter.</p>                                                               |
| 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 | <p>As per <a href="#">Customer Care &amp; Complaints Policy</a> – 'Section 1 – Introduction'.</p> <p>Dedicated webpage <a href="http://www.poplarharca.co.uk/about-us/complaints/">www.poplarharca.co.uk/about-us/complaints/</a></p> <p>Including information on Housing Ombudsman Service, Housing Ombudsman Scheme, complaint handling code and self-assessments</p> <p><a href="https://www.poplarharca.co.uk/about-us/complaints/housing-ombudsman/">https://www.poplarharca.co.uk/about-us/complaints/housing-ombudsman/</a></p> |
| 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 | <p>As per <a href="#">Customer Care &amp; Complaints Policy</a> – Section 3 – Who can complain?</p> <p>Information also available on our website under '<a href="#">What is a complaint?</a>'</p>                                                                                                                                                                                                                                                                                                                                      |

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| 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 | <p>Information on how to access Ombudsman Service is included on website <a href="http://www.poplarharca.co.uk/about-us/complaints/">www.poplarharca.co.uk/about-us/complaints/</a> and in our regular newsletter.</p> <p>Complainants are signposted to Ombudsman when.</p> <ul style="list-style-type: none"> <li>• Complaint falls under policy exclusion.</li> <li>• Complaint acknowledgement</li> <li>• Complaint response at stage 1</li> <li>• Complaints escalation acknowledgment</li> <li>• Complaint response at stage 2</li> </ul> |
| <b>Section 4 – complaint handling staff</b> |                                                                                                                                                                                                                                                                                                                                      |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 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>Dedicated Customer Relations Team responsible for complaint handling, with direct line to CEO and Corporate Management Team.</p> <p>Dedicated complaint investigator in Technical Team which receives a significant proportion of complaints.</p> <p>Head of Customer Services / Director of Corporate Services, responsible for liaising with Ombudsman and reporting to governing body.</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>Customer Relations Team has good working relationship across the organisation, working with teams and management on a day-to-day basis.</p> <p>The Team has authority to champion complainants to resolve disputes promptly and fairly.</p>                                                                                                                                                                                                                                                                                                  |
| 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>Customer Relations Team sits in Corporate Services directorate, with direct and immediate access to CEO, ELT and CMT.</p> <p>Each department follows Customer Care &amp; Complaints Policy, and complaints procedure.</p> <p>Complaints and lessons learnt reported centrally and monitored by Corporate Management Team and Services Committee.</p> <p>Resources regularly reviewed against changes in demand and complexity.</p> <p>Staff have undertaken Ombudsman’s Complaints Handling Training.</p>                                    |

| Section 5 – complaint handling process |                                                                                                                                                                                                                                                                                                                          |     |                                                                                                                                                                                                                                                                                                                                                                            |
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| 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 | As per <a href="#">Customer Care &amp; Complaints Policy</a>                                                                                                                                                                                                                                                                                                               |
| 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 | As per <a href="#">Customer Care &amp; Complaints Policy</a> ‘Section 4 – Process’<br>We operate a two-stage process.<br>Information also available on our website under <a href="#">‘What’s our complaints process’</a>                                                                                                                                                   |
| 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 per <a href="#">Customer Care &amp; Complaints Policy</a> ‘Section 4 – Process’<br>We operate a two-stage process.<br>Information also available on our website under <a href="#">‘What’s our complaints process’</a>                                                                                                                                                   |
| 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 | All complaints managed internally.<br>Third party RLOs manage concerns in-line with Poplar HARCA’s Customer Care & Complaints Policy.<br>Contractors included in complaints briefings and training.                                                                                                                                                                        |
| 5.5                                    | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                                                                   | Yes | All complaints managed internally.<br>Third party RLOs manage concerns in-line with Poplar HARCA’s Customer Care & Complaints Policy.<br>Contractors included in complaints briefings and training                                                                                                                                                                         |
| 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 | As set out in our <a href="#">Customer Care &amp; Complaints Policy</a> . ‘Section 4 – Process’.<br>Our Customer Care Code requires contact with complainant <a href="#">Customer Care &amp; Complaints Policy</a><br>Training includes how to elicit better understanding from complainant.<br>Understanding of complaint is summarised in acknowledgement and responses. |

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| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>This is also outlined on our website under <a href="#">‘What’s our complaints process?’</a></p> <p>When exclusion policy exercised, this is explained to the complainant. This is also outlined on our website under <a href="#">‘What’s not a complaint’</a></p> <p>Customer Relations Team triage complaints centrally and make clear aspects of complaints we are and aren’t responsible for within the acknowledgement.</p> <p>Complaint responses will also signpost to third party responsibility for complaints.</p> |
| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <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 interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes | <p>Stage 1 complaint is responsibility of service manager.</p> <p>Stage 2 is managed by the Customer Relations Team</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Residents invited to meet before investigation</p> <p>All staff have regular training and awareness briefings; have access to senior colleagues; and can escalate any matter of concern at any stage. Customer Relations Team triage to avoid conflict of interest.</p>                                                                                                                                                                          |
| 5.9 | 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.                                                                                                                                                                                                                                              | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>This is also outlined on our website under <a href="#">‘What’s our complaints process?’</a></p> <p>Reinforced in regular training/awareness sessions</p>                                                                                                                                                                                                                                                                                                                                                                    |

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| 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>Staff and contractors receive training to identify safeguarding concerns and residents who need additional support.</p> <p>Dedicated Safeguarding Team to support and advocate for vulnerable and at-risk residents.</p> <p>Staff trained to signpost to variety of local independent advice and support.</p> <p>Authorised advocates can act for complainants.</p> <p>Staff/contractor training includes identifying and responding to individual needs.</p> <p>All policies undergo Equalities impact assessments <a href="#">Customer Care &amp; Complaints Policy</a></p> <p>All staff attend mandatory EDI training</p> |
| 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>As set out in <a href="#">Customer Care &amp; Complaints Policy</a>. 'what wont be logged as a complaint'</p> <p>Exclusions are also found on our website under '<a href="#">What's not a complaint</a>'</p> <p>Exclusions mirror HOS policy.</p> <p>Customer Relations Team triage individual complaints against the policy.</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 | <p>Complaints are managed and logged on our Complaints Database. All relevant information is logged and uploaded on the database.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 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>As per <a href="#">Customer Care &amp; Complaints Policy</a>.</p> <p>Reinforced in regular training/awareness sessions</p> <p>Also covered within the Customer Care and Complaints Procedure</p>                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| 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 | As per <a href="#">Customer Care &amp; Complaints Policy</a> . 'Unreasonable Behaviour' section mirrors HOS policy.                                                                                                                                                                                                         |
| 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 | Decision is taken by a senior manager.<br><br>Decisions are reviewed regularly (every 6 months) and can be appealed through the complaints process.<br><br>Policy has been equality impact assessed.                                                                                                                        |
| <b>section 6 – complaint stages</b> |                                                                                                                                                                                                                                                                                                                                                                                                         |     |                                                                                                                                                                                                                                                                                                                             |
| <b>Stage 1</b>                      |                                                                                                                                                                                                                                                                                                                                                                                                         |     |                                                                                                                                                                                                                                                                                                                             |
| 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 | Reinforced in regular training/awareness sessions.<br><br>Triage by, and advice from, Customer Relations Team.                                                                                                                                                                                                              |
| 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 | As set out in our <a href="#">Customer Care &amp; Complaints Policy</a> . 'section 4 – Process'.<br><br>Complaints are logged, acknowledged and summarised within 5 working days.                                                                                                                                           |
| 6.3                                 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.                                                                                                                                                                                                                                                                                  | Yes | As set out in our <a href="#">Customer Care &amp; Complaints Policy</a> . 'section 4 – Process'.<br><br>Information also available on our website under ' <a href="#">What's our complaints process</a> '                                                                                                                   |
| 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 | As set out in our <a href="#">Customer Care &amp; Complaints Policy</a> . 'section 4 – Process'.<br><br>Reinforced in regular training/awareness sessions.<br><br>Discussion between complaint investigator and Customer Relations Team<br><br>Information also available on our website under ' <a href="#">What's our</a> |

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|     |                                                                                                                                                                                                                                                                                                                                                                                                               |     | <a href="#">complaints process'</a>                                                                                                                                                                                                                                                                                         |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>, 'section 4 – Process'.</p> <p>Information also available on our website under <a href="#">'What's not a complaint?'</a></p> <p>Reinforced in regular training/awareness sessions.</p> <p>Extension template used which contains HOS details</p> |
| 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>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>, 'section 4 – Process'.</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                                            |
| 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>Reinforced in regular training/awareness sessions.</p> <p>Guidance from Customer Relations Team</p> <p>Response template used</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>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>, 'section 4 – Process'.</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Guidance and advice taken from Customer Relations Team</p>                                                                                              |
| 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"> <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> <li>e. the details of any remedy offered to put things right;</li> </ul>   | Yes | <p>As per Complaints Procedure</p> <p>Stage 1 complaint response template used</p> <p>Guidance from Customer Relations Team</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                                                                                   |

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|                | <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>                                                              |     |                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>stage 2</b> |                                                                                                                                                                                                                                 |     |                                                                                                                                                                                                                                                                                                                                                                                                |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p>                                                                                                                                                                                  |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Escalations are logged, acknowledged and summarised within 5 working days</p>                                                                                                 |
| 6.12           | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Triaged and logged by Customer Relations Team</p> <p>The Stage 2 procedure offers an opportunity for complainant to meet with Panel to better understand dissatisfaction.</p> |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.                                                                                                           | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Stage 1 – investigated by manager.</p> <p>Stage 2 – investigated by Senior manager</p>                                                                                        |

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| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.                                                                                                                                                                                                                  | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Reinforced in regular training/awareness sessions.</p>                                                                             |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Extension template is used</p>                                           |
| 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 | <p>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Extension template is used which contains details of HOS</p>             |
| 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>As set out in our <a href="#">Customer Care &amp; Complaints Policy</a>. 'section 4 – Process'.</p> <p>Information also available on our website under '<a href="#">What's our complaints process</a>'</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Monitored by Customer Relations Team, Panel and relevant department.</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>Reinforced in regular training/awareness sessions.</p> <p>As per Complaints Procedure</p>                                                                                                                                                                                                                                                        |

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| 6.19                                    | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ol style="list-style-type: none"> <li>1. the complaint stage;</li> <li>2. the complaint definition;</li> <li>3. the decision on the complaint;</li> <li>4. the reasons for any decisions made;</li> <li>5. the details of any remedy offered to put things right;</li> <li>6. details of any outstanding actions; and</li> <li>7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol>                                                               | Yes | As per Complaints Procedure<br>Complaints Stage 2 response template used<br>Guidance from Customer Relations Team<br>Reinforced in regular training/awareness sessions.                                                                                                                    |
| 6.20                                    | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes | As per <a href="#">Customer Care &amp; Complaints Policy</a> .<br>Stage 2 Complaint Response template includes statement on final response.<br><br>All relevant teams and staff are involved in the resolution of cases. Pre-meets, case reviews and meetings take place to discuss cases. |
| <b>Section 7 – putting things right</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |     |                                                                                                                                                                                                                                                                                            |
| 7.1                                     | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ol style="list-style-type: none"> <li>1. Apologising;</li> <li>2. Acknowledging where things have gone wrong;</li> <li>3. Providing an explanation, assistance or reasons;</li> <li>4. Taking action if there has been delay;</li> <li>5. Reconsidering or changing a decision;</li> <li>6. Amending a record or adding a correction or addendum;</li> <li>7. Providing a financial remedy;</li> <li>8. Changing policies, procedures or practices.</li> </ol> | Yes | Reinforced in regular training/awareness sessions.<br><br>As per <a href="#">Customer Care &amp; Complaints Policy</a> .<br><br>As per Complaints Procedure<br>Complaints response template includes reference remedies                                                                    |
| 7.2                                     | Any remedy offered must reflect the impact on the resident as a result of any fault identified                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes | Reinforced in regular training/awareness sessions.<br><br>As per <a href="#">Customer Care &amp; Complaints Policy</a> . 'Section 5 - Remedy'                                                                                                                                              |
| 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 | Reinforced in regular training/awareness sessions.<br><br>Response template used                                                                                                                                                                                                           |

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| 7.4                                     | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes | Reinforced in regular training/awareness sessions.<br>As per <a href="#">Customer Care &amp; Complaints Policy</a> . 'Section 5 - Remedy'<br>Mirrors HOS policy on Remedy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Section 8 – putting things right</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8.1                                     | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:<br><br>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.<br><br>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.<br><br>c. any findings of non-compliance with this Code by the Ombudsman.<br><br>d. the service improvements made as a result of the learning from complaints.<br><br>e. any annual report about the landlord's performance from the Ombudsman; and<br><br>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | Poplar Board and Services Committee receive: <ul style="list-style-type: none"> <li>• Annual self-assessment against the code</li> <li>• Annual complaints performance report</li> <li>• Non-compliance findings by the Ombudsman</li> <li>• Lessons learnt.</li> <li>• Landlord's annual performance report from the Ombudsman</li> <li>• Resident annual report</li> <li>• Self-assessment against: <ul style="list-style-type: none"> <li>○ Complaint Handling Code</li> <li>○ HOS spotlight reports</li> <li>○ HOS annual/trend reports</li> </ul> </li> <li>• Also receive operational complaint performance and trend information to each meeting.</li> </ul> |
| 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 | Annual complaints performance and service improvement report is reported to Services Committee and Board.<br><br>Complaints Annual Report is published on the <a href="#">website</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8.3                                     | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Yes | The Business Support Team review self-assessment on the back of significant restructure, merger and/or change in procedures. This was last done in March 2024 and now in May 2025, in line with changes to Customer Care & Complaints Policy.                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| 8.4                                                                            | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.                                                                                                                                                                                                              | Yes | The Business Support Team review self-assessment on the back of Ombudsman investigation or recommendations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 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 | The Business Support Team will lead on notifying the Ombudsman and complainant in the event of non-compliance with the Code.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>section 9 – scrutiny and oversight: continuous learning and improvement</b> |                                                                                                                                                                                                                                                                                                                    |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 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 review meetings capture lessons learned.</p> <p>Regular complaints trend analysis and performance reports capture lessons learnt. These are used to amend policy, procedure, training, and awareness materials.</p> <p>Trend and benchmarking analysis discussed with ELT, CMT, Heads and managers.</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 are a source of insight along with other feedback to drive improvements.</p> <p>Complaints are monitored by Poplar Board, Services Committee, SLT, and CMT.</p> <p>Lesson learnt and reviews carried out to drive improvement</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 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 | <ul style="list-style-type: none"> <li>Realtime performance: <a href="http://www.poplarharca.co.uk/about-us/our-performance">www.poplarharca.co.uk/about-us/our-performance</a></li> <li>Resident Annual Report: <a href="http://www.poplarharca.co.uk/about-us/who-we-are/policies-publications/category/annualreports/">www.poplarharca.co.uk/about-us/who-we-are/policies-publications/category/annualreports/</a></li> <li>Complaints: <a href="http://www.poplarharca.co.uk/about-us/complaints/service-improvement/">www.poplarharca.co.uk/about-us/complaints/service-improvement/</a></li> <li><a href="#">Annual Complaints Report</a></li> <li>Quarterly reporting to Services Committee and Poplar Board</li> <li>Annual Report to Services Committee and Poplar Board</li> <li>Case studies in newsletters</li> <li>You said/we did in newsletters.</li> </ul> |

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|     |                                                                                                                                                                                                                                                                                                 |     | <ul style="list-style-type: none"> <li>Lessons learned discussed with Estate Boards/Gatherings</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 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 | <p>The Director of Corporate Services is lead person for complaint handling.</p> <p>Themes and trends are assessed periodically in line with reporting and case reviews including report of risk to Board and revision of policies.</p>                                                                                                                                                                                                                                                                                                                                                                                                              |
| 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 | The Chair of the Services Committee is our lead member responsible for complaints                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 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 | Yes | <p>Poplar Board and Services Committee receive:</p> <ul style="list-style-type: none"> <li>Annual self-assessment against the code</li> <li>Annual complaints performance report</li> <li>Non-compliance findings by the Ombudsman</li> <li>Lessons learnt.</li> <li>Landlord's annual performance report from the Ombudsman</li> <li>Resident annual report</li> <li>Self-assessment against: <ul style="list-style-type: none"> <li>Complaint Handling Code</li> <li>HOS spotlight reports</li> <li>HOS annual/trend reports</li> </ul> </li> <li>Also receive operational complaint performance and trend information to each meeting.</li> </ul> |

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| 9.7 | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>          | Yes | <p>Poplar Board and Services Committee receive:</p> <ul style="list-style-type: none"> <li>• Annual self-assessment against the code</li> <li>• Annual complaints performance report</li> <li>• Non-compliance findings by the Ombudsman</li> <li>• Lessons learnt.</li> <li>• Landlord's annual performance report from the Ombudsman</li> <li>• Resident annual report</li> <li>• Self-assessment against: <ul style="list-style-type: none"> <li>○ Complaint Handling Code</li> <li>○ HOS spotlight reports</li> <li>○ HOS annual/trend reports</li> </ul> </li> <li>• Also receive operational complaint performance and trend information to each meeting.</li> </ul> |
| 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"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes | <p>Corporate values and behaviours, annual targets, and training materials all support, complement and encourage staff to improve complaints handling.</p> <p>Performance included on Team and Corporate meeting agendas.</p> <p>Reinforced in regular training/awareness sessions.</p> <p>Complaints review meetings capture lessons learned.</p> <p>CEO KPIs include targets for service satisfaction.</p>                                                                                                                                                                                                                                                               |