

**Peaks and Plains Housing Trust – Housing Ombudsman Complaint Handling Code self-assessment form June 2024**

**Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The Ombudsman's definition of a complaint is included in the Peaks and Plains policy and procedure (4.1.6). It has also been used within training delivery provided to staff at the Trust.
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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	All expressions of dissatisfaction are logged, including when the word ‘complaint’ is not used by the customer. Service requests are logged and given to the relevant team to action within 3 working days.  Contacts are triaged by Customer Experience team to ensure the issue is logged accordingly. This is also overseen by the Complaints Coordinator. The Trust accept complaints from advocates acting on behalf of customers.

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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The difference between a service request and complaint is outlined in the policy. Staff receive ongoing training and also have access to the complaints training site to recognise the difference and respond to accordingly within the given timescales. The Trust also operate a feedback service where customers can raise suggestions about how we can improve our services.
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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	<p>All expressions of dissatisfaction are logged, including when the word 'complaint' is not used by the customer. All service requests that have not been completed within 3 working days will automatically be escalated to stage 1 of the complaints process.</p> <p>Staff receive ongoing training and also have access to the complaints training site to recognise the difference and respond to accordingly within the given timescales.</p>

1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The Complaints team contact every customer that has expressed dissatisfaction with how their complaint has been handled to ascertain if the issue can be corrected or use the feedback for learning – this applies for both the transactional surveys and also feedback from the Tenant Satisfaction Measures (TSM) survey. Negative feedback is viewed as an opportunity to improve services and we promote our complaints process to ensure that customers know how to make a complaint.
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Complaints policy</a>	All complaints will be accepted unless the issue does not meet the agreed definition, which is covered in the complaints policy within the exclusions section 4.2. We will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss this with the Complaints Coordinator.
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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	These exclusions are clearly set out in section 4.2 within the complaints policy. The Complaints Team will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss any enquiries with the team.

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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	This is stipulated in the complaints policy within the exclusions section (4.2). We will advise customers in writing of the reasons why we have refused to escalate a complaint but will use discretion on a case by case approach when making a decision. Customers can also discuss their case with the Complaints Coordinator.
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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	This is detailed in the complaints policy within the exclusions section (4.2). We will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss their case with the Complaints Team.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Complaints policy</a>	Staff receive ongoing training and also have access to the complaints training site to handle each complaint individual to the circumstances of each complaint. The decision to decline a complaint is discussed between the Manager of the team, and the Complaints Manager.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Complaints policy Equality, diversity and inclusion (EDI) (peaksplains.org)</a>	<p>Customers can make a complaint via their preferred channel:</p> <ul style="list-style-type: none"> <li>• Face to face,</li> <li>• Telephone,</li> <li>• E-mail,</li> <li>• Letter,</li> <li>• Live chat,</li> <li>• Online account,</li> <li>• Trust’s website,</li> <li>• or a social media channel.</li> </ul> <p>This is explained in the customer complaints section of our website, on the Complaints process leaflet and also detailed in the policy.</p> <p>When a complaint is raised, staff have received training to ask if there are any adjustments that are required to be made for the complaint to be handled for them which is logged on our CRM system.</p> <p>In 2022 the Trust embarked on a customer data project to reach out to all customers in order to validate the data we hold. This exercise included capturing customers contact preferences and any vulnerabilities they wished us to be aware of for the purpose of tailoring our service to meet their needs.</p>

				The Trust have an EDI Policy. All staff undergo regular EDI training. An EDI Forum operates within the Trust where complaints relating to EDI are discussed. In addition, all staff have a standard objective on PDP's around demonstrating a commitment to EDI at all levels of Trust activity.
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	<a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Complaints policy</a>	Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy, procedure and compensation policies. Mandatory training is undertaken by all new staff. Staff also have access to an online Training site and are encouraged to take online courses by the Housing Ombudsman.
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	<a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust encourage customers to let us know when something is not right. Service improvements and lessons learned from previous feedback are detailed on the website.  Feedback is welcomed by the Trust and recognise that this empowers customers to feel involved in improving services.
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	<a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Complaints policy</a>	The complaints policy and procedure is available on our website. Customers may request a hard copy, Braille, large print or translation of the policy which the Complaints Team will arrange. There is also a 'Sight Accessibility' feature on the website. The Complaints leaflet is given at sign up in sign up packs.

			<a href="#">REASONABLE ADJUSTMENTS POLICY</a>	The Trust has a reasonable adjustments policy which can be used in conjunction with the complaints policy to ensure that customers who need additional support in understanding and navigating the complaints service will have access to it.
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	<a href="#">Complaints policy</a> <a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The Trust publish the policy and code on our website. Information about the Complaints process is published online and in newsletters. The Trust issue a complaints process leaflet with every complaint acknowledgement letter. The Housing Ombudsman Service and contact details are referenced in each of these publications.
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	<a href="#">Complaints policy</a>	The Trust accept complaints from customer representatives providing we can confirm authority is in place to discuss personal information relevant to the case. Customers are advised that they can be accompanied or have a representative with them when meeting them to discuss a case.
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	<a href="#">Complaints policy</a> <a href="#">Compliments and complaints - what to do when things go wrong (peaksplains.org)</a>	This is detailed in the Trusts complaints policy and also included in every complaint acknowledgement and also our response letters. It is also on the complaints section of the Trust website and Customer Service staff are aware of the Ombudsman's contact details.



## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The complaints team comprises of a Complaints Coordinator and Customer Experience Manager and they work closely with all teams to ensure a detailed investigation and response to the customer. Managers are responsible for stage 1 'Investigations' and Senior Managers for stage 2 'reviews'
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	<a href="#">Complaints policy</a>	The Complaints Coordinator has access to staff at all levels to facilitate the prompt resolution of complaints and the authority and autonomy to act to resolve disputes promptly and fairly. The Complaints Coordinator receives ongoing training and coaching from the Customer Experience Manager to ensure they are fully equipped to handle all complaints in the correct way. They are empowered to work with staff at all levels to ensure timely responses. If there is a need to escalate any issues, this is done via the Customer Experience Manager.

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	<a href="#">Complaints policy</a>	<p>Complaints have been embedded as a core service within the Trust. the Customer Experience Manager meets with all staff responsible for complaint handling every quarter – this meeting is to discuss trends, lessons learned and to provide on-going training and support on a regular basis.. Additionally, there will be a monthly meeting with Senior Management to discuss all ‘Review’ stage complaints due to launch in July 24. All Complaints Handlers have completed the online training by the Housing Ombudsman on Dispute Resolution. The Trust are part of the Northwest complaints forum to share knowledge/best practice within the sector.</p> <p>Our Executive Management Team receive specific complaint handling performance reports on a quarterly basis. Our Board also receive an annual complaints performance report.</p>
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<a href="#">Complaints policy</a>	The Trust have one policy in place for the complaints service. All customers will be treated with respect and not treated differently following any complaint made and can still access all other services with no prejudice.
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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The Trust have a 2 stage complaints policy. In cases where the Trust can deal with an issue as a service request, the customer will be contacted within 3 days. All staff have been asked to make efforts to reach a resolution to any complaints as soon as possible We are implementing a new complaints case management system from August 2024 that will allow us to migrate from our current spreadsheet management to system based approach. This will enable us to enhance reporting capability and support early resolutions during either of our 2 stages of complaint handling.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust operate a 2 stage complaints process – Investigation – stage 1 (10 day response) and Review -stage 2 (20 working days response).

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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust takes full responsibility for all complaint responses regarding contractors and will treat all cases as per the policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust takes full responsibility for all complaint responses and will treat all cases as outlined in the policy. The Trust may seek information from third parties during an investigation but the matter will be conducted internally as per the policy.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Complaints Coordinator has undergone training to write acknowledgement letters and to break down the reasons for the complaint – demonstrating understanding of the complaint and desired outcomes in writing. If the issues are not clear, the Coordinator will contact the customer to discuss in more detail. The Investigating Officer will also contact the customer to discuss the complaint further as part of their investigation.

5.7	<p>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.</p>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a>  <a href="#">Complaints policy</a></p>	<p>The Complaints Coordinator uses a template letter to acknowledge complaints and has undergone training to break down the reasons for the complaint and gain an understanding of how the complaint can be resolved. They will explain reasons if there are any aspects of the complaint the Trust may not be responsible for. The Investigating Officer will also contact the customer to discuss the complaint further as part of their investigation and to ensure clarity on each point raised.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits, act independently, and</li> <li>• have an open mind;</li> <li>• give the resident a fair chance to set out their position;</li> <li>• take measures to address any actual or perceived conflict of interest; and</li> <li>• consider all relevant information and evidence carefully.</li> </ul>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a>  <a href="#">Complaints policy</a></p>	<p>Staff use an evidence based approach where possible. If there are any areas where conflict of interest is believed to be present, steps are taken to ensure that this has no impact on the investigation. Staff undertake regular training and quality monitoring is undertaken to ensure that the investigation is conducted in the correct manner.</p> <p>Our values guide how we operate:</p> <ul style="list-style-type: none"> <li>• We are one team with one goal</li> <li>• We are solution focused</li> <li>• We are customer focused but business minded</li> <li>• We are reliable and do the right thing</li> <li>• We are respectful and celebrate our differences</li> </ul>

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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	<p>In cases where an extension is required, the Investigating Officer will contact the customer to agree a new date and explain the reasons why there is a delay.</p> <p>In cases where the customer does not accept the change in timescales, the Housing Ombudsman contact details are also provided.</p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<a href="#">Equality, Diversity and Inclusion Policy (peaksplains.org)</a> <a href="#">Vulnerable persons policy</a>  <a href="#">REASONABLE ADJUSTMENTS POLICY</a>	<p>The Trust have an EDI Policy. All staff undergo regular EDI training. An EDI Forum operates within the Trust where complaints relating to EDI are discussed. The complaints policy has been subject to an Equality Impact Assessment. When a complaint is made, staff ask if there are any reasonable adjustments we may need to be aware of in order to handle their complaint in the best way possible. The Trust has a reasonable adjustments and a vulnerable persons policy to support this approach . When a customer complains via the website, this question is also asked as part of the online form. Vulnerabilities are logged on the customer account.</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	<a href="#">Complaints policy</a>	<p>This is covered in the complaints policy (4.2). We will advise customers in writing of the reasons why we have refused to escalate a complaint although it is rare that we will do so. The Trust keep a record of any refusals.</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	Internal folders and Open Housing case management system.	All case records are held on our Customer Relationship Management (CRM) system and all relevant documentation regarding the case will be stored in online files. In late 2024, all complaints workflows will be within our CRM system and will detail relevant information including: <ul style="list-style-type: none"> <li>• The date the complaint was received</li> <li>• When it was acknowledged and all responses</li> <li>• All evidence and correspondence</li> <li>• Notes from any associated interactions</li> <li>• The outcome, including remedies offered</li> </ul>
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	<a href="#">Complaints policy</a> <a href="#">Compensation policy</a>	Staff receive ongoing training to ensure that a complaint is remedied at the earliest time with no delays to the customer where possible.
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	<a href="#">Unacceptable behaviour policy</a>	The Trust has an Unacceptable Behaviour policy which is approved by The Trusts involved tenants/Challenge Group and the Board and is published on our website. The policy clearly outlines our approach to managing unacceptable behaviour.

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	<a href="#">Equality, Diversity and Inclusion Policy</a> <a href="#">Unacceptable behaviour policy</a> <a href="#">Complaints policy</a>	This approach is considered and detailed in the EDI and Unacceptable Behaviour policies.
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## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<a href="#">Complaints policy</a>	Contacts are triaged by Customer Experience team and the Complaints Coordinator to ensure the issue is logged accordingly. All staff are empowered to resolve complaints as early as possible.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	All complaints are acknowledged within 5 working days of receiving the complaint by the Complaints team but usually much quicker than this timescale.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	Our Stage 1 response timescale is 10 working days which is measured and reported on the Monthly KPI report, quarterly to Board and Executive team and also the Customer Challenge Group. All complaint handling staff have received training to conduct investigations within 10 working days. The responses are quality checked by the Complaints team ahead of them being sent to the customer.

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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust aim to understand as quickly as possible whether a complaint is likely to require an extension beyond the 10 day target. In cases where an extension is required, the Investigating Officer will contact the customer to agree a new date and explain the reasons why. .In cases where the customer does not accept the change in timescales, the Housing Ombudsman contact details are also provided to customers.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Complaints Coordinator includes the Ombudsman contacts details when advising of an extension of timescales. Customers are also regularly reminded of their right to approach the Housing Ombudsman at any stage of their complaint.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	<p>Staff undertake regular training and are expected to provide the response letter once the investigation is complete within the given timescales. Outstanding actions are the responsibility of the Investigating Manager to monitor and action and keep the customer informed.</p> <p>The Investigation response include the following details:</p> <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• The definition of the complaint</li> <li>• The customers desired outcome</li> <li>• The decision of the complaint (upheld / not upheld)</li> <li>• The reasons for the decisions made</li> </ul>

				<ul style="list-style-type: none"> <li>• Remedies</li> <li>• Details of any outstanding issues</li> <li>• Details about how to escalate to stage 2 if the customer is not happy with the response</li> <li>• The Housing Ombudsman’s contact details.</li> </ul> <p>Outstanding actions are currently recorded and tracked via a spreadsheet owned by the Trusts complaints coordinator. The Trust will improve the process for the recoding and monitoring of complaint actions during 2024/25 by moving the actions from spreadsheet management into an existing system with full reporting capabilities.</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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	<p>We ensure that every aspect of a complaint is responded to accordingly. All points are covered in our complaints training and regular complaints meetings held with staff. Training videos can be accessed via the Trusts e-learning system. Completing complaints e-learning is a mandatory requirement with completion rates monitored and reported through the Trusts Performance Management Group (PMG). A letter template is used for guidance for staff as a checklist.</p>

6.8	<p>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.</p>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a>  <a href="#">Complaints policy</a></p>	<p>Should any new issues arise during the investigation, we aim to incorporate these in to the original response. If matters are not related to the original complaint, or the deadline is very near, we will discuss with the customer about either extending the response due date or opening a separate case.</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> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a>  <a href="#">Complaints policy</a>  <a href="#">Compensation policy</a></p>	<p>This is required as part of our Stage 1 and letter templates. Staff have received training to ensure that every point is answered too. Letters have been structured using the Housing Ombudsman’s template which ensures all the requirements are included.</p> <p>All letters are quality checked before they are sent by the Complaints Coordinator.</p>

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	Within the written response to the Investigation, customers are informed about their right to escalate to Review stage if they remain dissatisfied with the first response. The Trust ask that the customer informs us within 28 days if they wish to escalate but we would consider requests outside of that time. We do not require a reason for the escalation as per the Housing Ombudsman code.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust will acknowledge the escalation request within 5 working days. Our Stage 2 response timescale is 20 working days which is measured and reported on the Monthly KPI report, quarterly to Board and Exec team and the Customer Challenge Group. The Senior Manager will contact the customer and ask for a face to face meeting. All responses are quality checked by the Complaints team ahead of them being issued to the customer.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	The Trust will not obstruct the customers right to progress the complaint because of the lack of clarity around why the customer remains dissatisfied but the Investigating Manager will contact the customer to aim to gain a better understanding of the desired outcome of the customer.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	Stage 2 complaints are allocated to a Senior Manager that was not previously involved in the Investigation stage response.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	Investigations and the response letter will be concluded within 20 working days. Where this is not possible, the customer will be advised and informed about the reason why.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	In cases where an extension is required, the Investigating Officer will contact the customer to agree a new date and explain the reasons why. We will endeavour to let the customer know well in advance of the due date where possible.
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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	In cases where an extension is required, the Investigating Officer will contact the customer to agree a new date and explain the reasons why. The Housing Ombudsman contact details are also provided to customers in all complaint correspondence and on our website.

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	<a href="https://peaksplains.org">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	Review stage complaints may be closed with outstanding actions which are not able to be closed ahead of the response due date. Staff are responsible for remaining in contact with the customer about any outstanding actions. There is an ongoing project to log and track all outstanding actions on the Trust's CRM system that will allow staff to report on each item. This is expected to be implemented by the end of 2024.
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	<a href="https://peaksplains.org">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	All information is provided in the Review stage response. Letters have been structured using the Housing Ombudsman's template which ensures all the requirements are included. All staff responsible for dealing with complaints have received training and also have access to training videos and guidance on our Share Point site.

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 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> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	<p><a href="#">Complaints policy</a></p> <p><a href="#">Send us a complaint (peaksplains.org)</a></p> <p><a href="#">Compensation policy</a></p>	<p>Letters have been structured using the Housing Ombudsman’s template which ensures all the requirements are included.</p> <p>All letters are quality checked prior to being sent to the customer by the Complaints Coordinator.</p>
6.20	<p>Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a></p> <p><a href="#">Complaints policy</a></p>	<p>The Complaints Coordinator allocate Review stage complaints to a Senior Manager. Senior Managers are supported by the Complaints team to respond to the customer. Training manuals and videos are also available on our Complaints Share Point site.</p>



## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a></p> <p><a href="#">Complaints policy</a></p> <p><a href="#">Compensation policy</a></p>	<p>The Trust recognise that it is important to offer an apology early on in the process when something has gone wrong.</p> <p>There are a number of ways in which the Trust will offer an apology and remedy including:</p> <ul style="list-style-type: none"> <li>• Acknowledging when we have made errors</li> <li>• Providing the reasons as to why they happened</li> <li>• Saying sorry</li> <li>• Taking action where needed</li> <li>• Changing a decision</li> <li>• Updating records</li> <li>• Compensation</li> <li>• Changing policies or procedures</li> </ul>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p><a href="#">Send us a complaint (peaksplains.org)</a></p> <p><a href="#">Compensation policy</a></p> <p><a href="#">Complaints policy</a></p>	<p>Training has been provided to staff to ensure that they take in to consideration the impact of any fault/s on the customer. The Ombudsman's remedies guide is considered to decide on relevant amounts for monetary amounts.</p>

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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Compensation policy</a> <a href="#">Complaints policy</a>	Where possible, the Trust will provide dates to complete any actions within the response letter. If this is not possible, it is the responsibility of the Investigation Officer to monitor and keep in touch with the customer. The ongoing project to have all complaints cases and outstanding tasks will be complete by the end of 2024 when all outstanding promises will be logged on the CRM system.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Compensation policy</a> <a href="#">Complaints policy</a>	The Trusts policy takes account of the guidance issued by the Ombudsman and is used when considering remedies. The Trust also use the 'Remedies and Compensation guidance' issued by the Ombudsman.

## Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol>	Yes	<a href="https://peaksplains.org/your-voice/compliments-and-complaints/lessons-learned/">Complaints policy peaksplains.org/your-voice/compliments-and-complaints/lessons-learned/</a>	<p>The Trusts produces quarterly and annual reports which include a thorough review of performance and learning outcomes. Quarterly reports are reviewed by the Executive Team and the annual report is reviewed by the Board.</p> <p>The quarterly and annual reports are reviewed by the Trust's Customer Challenge Group. From June 2024, the Trust will share the annual report with the Ombudsman and on the Trust website which has been approved by our governing body.</p>

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	<a href="#">Complaints policy</a> <a href="#">Send us a complaint (peaksplains.org)</a>	The Trusts produces quarterly and annual reports which include a thorough review of performance and learning outcomes. Quarterly reports are reviewed by the Executive Team and the annual report is reviewed by the Board.  The quarterly and annual reports are reviewed by the Trust's Customer Challenge Group. From June 2024, the Trust will share the annual report with the Ombudsman and on the Trust website which has been reviewed by our governing body.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<a href="#">Complaints policy</a>	Since 2020, the Trust have completed the self-assessment annually. In the case of significant changes, we will review and publish the re-assessed version.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<a href="#">Send us a complaint (peaksplains.org)</a>	The Trust will review and update the form following any request from the Ombudsman.
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	<a href="#">Complaints policy</a>	The Complaints team will notify the Ombudsman if any exceptional circumstances occur.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<a href="#">Complaints policy</a>	<p>Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy, procedure and compensation policy. Complaints are used as a tool to identify learning opportunities.</p> <p>The Trust records lessons learned from all upheld complaints. Trends of root causes of complaints are shared with Senior Management on a monthly basis within the performance management pack and at the performance management groups monthly meeting.</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	<a href="#">Send us a complaint (peaksplains.org)</a> <a href="#">Complaints policy</a>	<p>Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy, procedure and compensation policy. Learning processes are delivered with the support of the Customer Services Manager and Complaints Coordinator which includes driving a positive culture around complaints and making changes where necessary.</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	<a href="#">Complaints policy</a>	Updates are provided to Board, Senior Management and the Customer Challenge group regularly. Complaints have been discussed with customers in our recent consultation about this self-assessment, providing an opportunity to give feedback about our processes. Learning is also detailed on reports and our website.
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	<a href="#">Complaints policy</a>	The complaints team consist of a Customer Services Manager and Complaints Coordinator. The Head of Customer Improvement and Experience is responsible for identifying any themes or trends which pin point potential systemic issues, serious risks, or policies and procedures that require revision.
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	<a href="#">Complaints policy</a>	The Trust appointed an MRC from the Board in November 2022. The MRC meets with the Customer Services Manager on a quarterly basis.
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	<a href="#">Complaints policy</a>	All complaints performance including Ombudsman determinations are reported to the MRC and the Board.

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><a href="#">Complaints policy</a>  <a href="#">Send us a complaint</a>  <a href="http://peaksplains.org"> (peaksplains.org)</a></p>	<p>All complaints performance including Ombudsman determinations are reported to the MRC and the Board on a regular basis throughout the year.</p>
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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 cooperative 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><a href="#">Complaints policy</a>  <a href="#">Send us a complaint</a>  <a href="http://peaksplains.org">peaksplains.org</a></p>	<p>The Trust's purpose is to 'be a great landlord' and all staff are empowered to 'do the right thing, even when no one is looking' which guides the actions of Trust staff. Our guiding values underpin our business wide approach of providing excellent customer service and encourages and supports colleagues to work collaboratively. This approach ensures the best outcomes for customers. We uphold the highest standards in complaint handling and amend our approach to reflect best practice. All staff are responsible for their awareness of the complaints policy and procedure and have received training. The Trust have a standard objective on personal development plans (PDP) of all staff responsible for complaint investigations. In September 24, the remainder of staff will also have this on their PDP.</p>
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