

Karbon Homes Complaint Handling Code Self-Assessment Form 2022

Section 1 - Definition of a complaint

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 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 | Within our Complaints, Compliments and Suggestions policy, supporting procedure for colleagues and customer Leaflet and Video. This was adopted in March 2021, has also been reiterated in colleague training during September 2022. |
| 1.3 | The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy. | Yes | Within our updated complaints policy and procedure this is clear, and this was also reiterated during colleague training in September 2022. |
| 1.6 | ... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | Yes | Within our Complaints, Compliments and Suggestions policy and procedure this is clear, and this was also reiterated during colleague training in September 2022. |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | Within our Complaints, Compliments and Suggestions policy and procedure we clarify our position. |
| 1.8 | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. | Yes | Within our policy and procedure, we outline matters not considered complaints, including service requests or services which have their own appeals process. Plus, in these documents, our customer leaflet and video we provide guidance on Service Requests and Make It Right (which is our fast, informal resolution process). |
| 1.9 | If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. | Yes | If we are unable to accept a complaint, a written response is provided to the customer with Ombudsman details included in this response. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 1.4 | Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received. | Yes | Definitions of Service Requests and Make It Right are provided within our Complaints, Compliments and Suggestions policy and procedure and for customers in our customer leaflet and video. Our systems are also designed to record the difference between these. |
| 1.5 | Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. | Yes | During our monthly transactional and perception surveys, conducted by a third party, customers are offered to request contact with Karbon to pursue any issues, by requesting a follow up. |

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 2.1 | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes | Our Complaints, Compliments and Suggestions policy and procedure, plus customer leaflet and video all illustrates all the various channels open to customers to make a complaint. This does include in person, telephone, in writing and by email. |
| 2.3 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding. | Yes | Our Complaints, Compliments and Suggestions policy is available online or in print on request. We also provide a complaints leaflet to explain the policy in simpler terms, and this is also available in a plain text version. We have an audio-visual version. All definitions, the stages and how they work, how customers transition between stages and all timeframes are included. We also have a simple infographic for customers to simplify the process and stages. |

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| 2.4 | Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website. | Yes | We have a dedicated section on our website for complaints. This includes our Complaints, Compliments and Suggestions policy, customer leaflet, infographic and video to explain how it works. This is easily accessible through a search plus we publish a quick link to this page on our letters. |
| 2.5 | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests. | Yes | Our Complaints, Compliments and Suggestions policy and procedure have dedicated sections to Equality and Diversity. To support the individual assessment of a customer's needs, it also presents a non-exhaustive list of reasonable adjustment options which could be considered. Complaint handlers training in September 2022 covered our policy. |
| 2.6 | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents. | Yes | We promote our complaint policy, the code and ombudsman through our customer magazine, customer email and website. We also offer a leaflet, infographic and audio video. |
| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | Ombudsman details are provided in stage 1 and stage 2 response letters, in our customer leaflet and video and on our website. |
| 2.8 | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted. | Yes | Our Complaints, Compliments and Suggestions policy and procedure clearly lays this out, as does our complaint leaflet, video and infographic. We also provide Ombudsman details in stage 1 and stage 2 response letters and the customer's right to access the Ombudsman service throughout. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 2.2 | Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes | Our Complaints, Compliments and Suggestions policy and procedure confirms we accept complaints from social media, using Twitter Direct Message and Facebook Messenger. Using direct messaging ensures confidentiality and privacy. These are routed into our Customer Relationship team who handle as we would any other complaint. |

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 3.1 | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer". | Yes | We have team who support named case handlers. We also have a Customer Feedback Specialist who oversees complaints and provides consultative service for case handlers – we consider they are our complaints officer. Case handlers are assigned according to the nature and stage of the complaint. We provide quarterly reporting into our Customer Committee, which includes board member who are delegated to focus on customer activity. |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | Our Complaints, Compliments and Suggestions policy and procedure lays out how we ensure there is no conflict of interests e.g., they would not investigate a complaint about themselves or would not hear both a stage 1 and 2. We provide complaint handling skills learning materials through our learning management system to all case handlers. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 3.3 | Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | We provide complaint handling skills learning materials through our learning management system to all colleagues. We also have defined colleague behaviours specifically regarding how we behave with customers. As our case handlers are within our service areas, they have access to quick resolution and the authority is made clear at each stage of the complaint. |

Section 4 - Complaint handling principles

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 4.1 | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt. | Yes | Karbon seek to understand the outcome a customer is looking for and work with them to find a mutually agreeable solution. During stage 2 our Complaints, Compliments and Suggestions policy and procedure also formally includes a question seeking the customer's desire outcome and a discussion prior to the investigation. Our systems are designed to capture this information and guide colleagues through the timelines. We do not have pre complaint stage, whilst we have a Make it Right - which is our fast, informal resolution process outside of the complaint process. Our policy and procedures aim to acknowledge stage one complaints in one working day – whilst no longer than 5 working days. |
| 4.2 | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | Our complaints handling system, has letter templates. The acknowledgement template includes a Complaint summary. If this is unclear, we seek further clarification. At stage 2 we also provide the customer with questions to clarify what they are unhappy with, the reason and what they would like us to do. This is also logged in our complaint system. |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | Our policy and procedure outline how the investigation is impartial, e.g., case handlers would not investigate a complaint about themselves or hear both stage 1 and 2. |
| 4.7 | The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | Our Complaints, Compliments and Suggestions procedure outlines the various role of colleagues which are involved in complaints. Supporting the best practice outlined here. |

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| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | We use a customer's preferred method of communication. We also share how we will communicate with them and when asked we will adapt. Our policy and procedure outlines examples of how we might adapt to suit customer's needs. |
| 4.12 | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> set out their position comment on any adverse findings before a final decision is made. | Yes | Case handlers discuss with a customer the nature of their complaint at stage 1. A conversation is requested with the customer in stage 2 to allow them to share their position in person before the investigation. Where a complaint involves a colleague, interviews are conducted to present their position and offer further information, after which findings are shared. |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | Within our policy we advise customers they have 10 working days to escalate to stage 2. We also share this in stage 1 response letter and in our complaint leaflet and video. |
| 4.14 | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint. | Yes | We ask customers to answer 3 escalation questions before escalating to stage 2. If they do not answer the questions, we would conduct this on the information available. If we were to refuse to escalate, we would explain in writing, including guidance on next steps. We also articulate in our policy where we would not accept a complaint such as matter being dealt with through legal action. |
| 4.15 | A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared. | Yes | All complaint information is recorded in one place on our complaint system. |
| 4.18 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint. | Yes | We have an Unacceptable Customer Behaviour policy and procedure. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic. | Yes | Colleagues endeavour to manage customer expectations. |

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| 4.4 | A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required. | Yes | We endeavour to complete a complaint investigation within 5 working days where possible, even though Ombudsman guidelines stipulate 10 working days and 20 working days for stage 1 and stage 2 complaints respectively. |
| 4.5 | Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable. | Yes | This is within our Complaints, Compliments and Suggestions policy and reflected in the customer leaflet and video. |
| 4.8 | Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties. | Yes | Where this is the case, we make this clear, for instance where we and the customer are obliged to complete Gas safety tests. |
| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Where this is appropriate, we'll name an individual, perhaps in naming who may be visiting the customer. However, we would not name people when it's not relevant or appropriate, such where the complaint is about this individual. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | Our policy and process support this behaviour. Complaint handlers provide contact details so they may be contacted during the complaint. Handlers also let customers know when they will next update them. |
| 4.16 | Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture. | Yes | In our Tenant Satisfaction Survey and ICS survey, we ask customers about their satisfaction with our complaint service. This information is shared with colleagues and in team meetings we establish actions on these learnings. |
| 4.17 | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained. | Yes | We have formal complaint case learning sessions which establish what we can share as good practice and developmental opportunities. We have wellbeing support available to all colleagues. Complaint learning is shared on our website and our intranet and shared in reports. |
| 4.19 | Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010. | Yes | We completed an Equality Impact Assessment to ensure that in our Unacceptable Customer Behaviour policy, consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations. |

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 5.1 | Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video we express our aim to respond in 5 working days, but we will respond in 10 working days. We also explain how if we need more time, we will agree this with the customer and share this in writing. |
| 5.5 | A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident. | Yes | Within our Complaints, Compliments and Suggestions policy and procedure and recent colleague we reiterated the importance of responding to the complaint when the answer is known. |
| 5.6 | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Letter templates prompt and provide guidance to ensure all points raised are responded to and the rationale for decision are presented. |
| 5.8 | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them. |

Best practice 'should' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 5.2 | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions. |
| 5.3 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | Yes | Our extension letter template includes the Housing Ombudsman contact details. |
| 5.4 | Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident. | Yes | All complaint details are captured on our complaints system to this can be achieved. |
| 5.7 | Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this. |

Mandatory 'must' requirements

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 5.9 | If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this, including transition between stage and exclusions. Our customer leaflet and video also explain the transitions between stages and their right to approach the Ombudsman. |

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| 5.10 | On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | Summary provided within acknowledgement letter template. We also ask customers to explain their reason for escalating their complaint using 3 questions. Furthermore, the customer is invited to discuss their complaint with the case handler before the investigation takes place. |
| 5.11 | Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident. | Yes | Our Complaints, Compliments and Suggestions policy and procedure plus our customer leaflet and video explain this. |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | Our Complaints, Compliments and Suggestions policy and procedure plus our customer leaflet and video explain this. |
| 5.13 | Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | Within our Complaints, Compliments and Suggestions policy, procedure, customer leaflet and video we express our aim to respond in 5 working days, but we will respond in 20 working days. We also explain how if we need more time, we will agree this with the customer and share this in writing. |
| 5.16 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | Yes | Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them. We do not operate a 3 rd stage. |

Best practice 'should' requirements

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 5.14 | If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template for extensions. |
| 5.15 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | Yes | Our extension letter template includes the Housing Ombudsman contact details. |

Mandatory 'must' requirements

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.17 | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances. | Yes | We currently only have two formal complaints stages – stage 1 and stage 2. |
| 5.20 | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | Yes | We currently only have two formal complaints stages – stage 1 and stage 2. |

Best practice 'should' requirements

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 5.18 | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | Yes | We currently only have two formal complaints stages – stage 1 and stage 2. |
| 5.19 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | Yes | We currently only have two formal complaints stages – stage 1 and stage 2. |

Section 6 - Putting things right

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 6.1 | Effective dispute resolution requires a process designed to resolve complaints. 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. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which prompts this. |
| 6.2 | Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents. | Yes | Our Complaints, Compliments and Suggestions procedure explains this. Plus, where customers are offered compensation where appropriate and our Compensation and Goodwill policy guides colleagues to provide a fair and reasonable remedy. |

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| 6.5 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | Our Complaints, Compliments and Suggestions policy and procedure explains this, and we provide a letter template which prompts this. |
| 6.6 | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused. | Yes | Our Compensation and Goodwill policy explains this. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 6.3 | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents. | Yes | Offer of redress and learnings are provided in both upheld and not upheld complaints |
| 6.7 | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | Yes | Our Compensation and Goodwill policy explains this. |

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 7.2 | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels. | Yes | We publish complaint learnings on our website and intranet. We also share more periodically through our customer magazine and annual report. A quarterly report is provided to our Resident Committee, and our Group Customer Committee and leadership teams. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 7.3 | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance. | Yes | Our Group Customer Committee, which includes board members, customers and Karbon leaders, is delegated to oversee our complaints performance. The chair of this committee, as a board member takes lead responsibility for overseeing our complaint's approach, performance and culture. |
| 7.4 | As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders. Regular reviews of issues and trends arising from complaint handling. The annual performance report produced by the Ombudsman, where applicable. Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | Yes | <p>We provide quarterly reporting into our Customer Committee, which includes board member who are delegated to focus on customer activity. This includes:</p> <ul style="list-style-type: none"> statistical data on complaints as listed details on all cases heard by the Ombudsman Ombudsman activity includes Code changes Complaint learning activity and findings Audit or risk activity relating to the complaints service An update on initiatives and progress <p>Furthermore, we established an Ombudsman case KPI which is reported to Leaders monthly and the Board quarterly.</p> <p>The annual self-assessment is shared with both the Customer Committee and Resident Committee for scrutiny and challenge.</p> |
| 7.5 | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training. | Yes | The quarterly reporting provides theme and trend analysis into our Customer Committee and our Karbon Management Team (KMT) for oversight. KMT have responsibility for policy and performance to act as appropriate, including training. |

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| 7.6 | Landlords should have a standard objective in relation | Yes | Our vision, values and behaviours are well communicated to |
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| | <p>to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | | <p>colleagues and embedded in our culture through communication and leadership. Our behaviours include those specific to how we interact with our customers.</p> <p>Our Complaints, Compliments and Suggestions Procedure also states the roles of: the complaint lead, the Customer Feedback Specialist, all colleagues and all leaders thereby clarifying their objectives in relation to complaint handling, including the specific objectives of collaboration and collective responsibility.</p> |
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 8.1 | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. | Yes | We complete a self-assessment form annually since this was introduced and the current version is published on our website in the dedicated complaints area. |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | This is being reviewed now in light of the code changes, new policy and procedure and the launch of the new system. |
| 8.3 | <p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance | Yes | This will be communicated as per guidance. |