

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	YES	<p>We have adopted the definition of a complaint as set out in the Complaint Handling Code. This is set out in part 3 of our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	<p>This definition of a complaint has been reflected in our Complaints Policy since the Code’s inception in 2020.</p> <p>Colleagues have received training on the definition of a complaint and receive training at induction and regular training on the wider principles of good approaches to complaint handling.</p> <p>TCH Training Log for complaint matters.</p>
1.3	<p>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.</p>	YES	<p>Part 3 of our policy reflects the fact that the word ‘complaint’ does not have to be used for a complaint to be identified and treated as such.</p> <p>The requirement to give residents the choice as to</p>	<p>We have provided training on these aspects of our policy to all colleagues that engage with residents.</p> <p>Customers are made aware that the opportunity to raise a formal complaint is there from the outset and they are reminded of this in any</p>

			<p>whether to make a complaint is also set out in part 3 of our Complaints Policy underneath the complaint definition.</p> <p>Part 4 of our Complaints Policy explains that we will accept complaints via third party advocates. It sets out the requirements around ensuring any third party has legitimate authority to bring a complaint on someone else's behalf.</p> <p>Evidence: Complaints Policy</p>	<p>subsequent communications until an issue is resolved.</p> <p>We have processes in place to ensure that residents' choices around how they would like issues progressed are being managed appropriately through the correct channels.</p>
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	YES	<p>Section 3 of our Complaints Policy sets out the need to recognise the difference between a complaint and a service request and provides examples.</p> <p>Evidence: Complaints Policy</p>	Recognising the difference between a service request and a complaint forms part of the regular training that we provide all colleagues who engage with residents.
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	YES	Section 4 of our Complaints Policy makes it clear that complaint responses will not be placed on hold due to	Colleagues are aware that complaints should be addressed at the time they are raised and not placed

	request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.		<p>outstanding actions and that any actions agreed in the response will be monitored to completion.</p> <p>Evidence: Complaints Policy</p>	<p>on hold pending completion of an outstanding action. This should only occur in exceptional circumstances and at the request of the resident.</p> <p>Similarly, colleagues are aware that outstanding tasks should not be placed on hold if they are subject to a complaint, instead, every effort should continue to be made to fulfil any obligations and deliver a service.</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	<p>We have an external partner that carries out customer satisfaction surveys covering a number of different service areas such as antisocial behaviour.</p> <p>We have provided our external partner with guidance on how to signpost residents regarding complaints and we monitor all dissatisfied feedback and the appropriate service areas engage with residents and complaints are raised where appropriate.</p>	

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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	<p>Circumstances under which we may decide not to accept a complaint are minimal - as set out in part 3 of our Complaints Policy.</p> <p>The policy stipulates that we will exercise our discretion appropriately and make sure that any decision to exclude a complaint is fair and valid and that the reasons for the decision are clearly explained to the resident.</p> <p>In such cases the resident will be provided contact details for the Ombudsman so that any decision taken to exclude a complaint can be challenged.</p> <p>Evidence: Complaints Policy</p>	TCH has a letter template that is used in these circumstances, the template reflects the same reasons set out in the policy and contains the Ombudsman contact details.

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"> • The issue giving rise to the complaint occurred over twelve months ago. • 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. • Matters that have previously been considered under the complaints policy. 	YES	<p>As set out in section 2.1 above, the Circumstances under which we may decide not to accept or escalate a complaint are set out in part 3 of our Complaints Policy and include the examples given in the Complaint Handling Code.</p> <p>Our exclusions are minimal, and the policy stipulates that we will exercise our discretion appropriately to make sure that any decision to exclude or not to escalate a complaint are fair, valid and clearly explained to the resident.</p> <p>Should we exclude or decline to escalate a complaint, residents will always be provided contact details for the Ombudsman so that our decision can be challenged.</p> <p>Evidence: Complaints Policy</p>	<p>At our regular training, we reinforced the message to colleagues about the importance of exercising discretion fairly and appropriately in all aspects of complaint management. As part of this approach, the focus should always be on accepting and escalating complaints as far as possible.</p> <p>TCH has a process in place to ensure that all considerations of something not being a complaint are referred to the Complaints and Feedback team to be checked before being actioned.</p>
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds.	YES	Our Complaints Policy has been updated to reflect the new requirement to accept complaints within 12 months of the issues	Colleagues are aware that we do not apply a blanket ban on accepting complaints received outside the 12-month timeframe.

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.		<p>occurring (rather than 6 months as it previously stood).</p> <p>The policy also emphasizes that we do not take a blanket approach and will apply discretion to cases received outside of this timeframe.</p> <p>Evidence: Complaints Policy</p>	Information on this change was shared with all colleagues via TCH's intranet and training has been delivered to all teams through team meetings.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	YES	<p>As set out above, any decision taken to exclude a complaint will be clearly explained to the resident – as set out in our Complaints Policy. They will also be recorded on our CRM system.</p> <p>Evidence: Complaints Policy</p>	If we exclude a complaint and the Ombudsman disagrees with our decision, we will make sure it is progressed in line with the Ombudsman's instructions. Any such examples will also be picked up as a training issue.
2.5	landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	<p>The need to consider each case on its merits and to not take a blanket approach to excluding complaints is set out in part 3 of our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	Colleagues are aware that we do not apply a blanket ban on not accepting complaints, including those received outside the 12-month timeframe. Refresher training has been delivered to all complaint handlers and staff that engage with residents.

				Decisions on whether to accept a complaint raised outside of 12 months are referred to the Complaints and Feedback Team.
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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	<p>Complaints can be raised via our contact centre and the dedicated complaint handling area on our website. Complaints can also be raised with us in person, social media and in writing.</p> <p>TCH has a Tenancy Support Team that provides support for residents and staff regarding reasonable adjustments.</p> <p>All staff receive annual Equality and Diversity Training.</p> <p>Evidence: TCH website Equality, Diversity and Inclusion Policy</p>	Additional guidance is provided on TCH's website.
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	YES	Part 4 of our Complaints Policy makes it clear that residents can raise a complaint via any means with any member of staff.	We have done a lot of work internally to raise awareness of the complaints process

	<p>be able to pass details of the complaint to the appropriate person within the landlord.</p>		<p>Evidence: Complaints Policy</p>	<p>and who to contact to ask about this.</p> <p>Updates and changes are regularly shared on our internal hub and the Complaints and Feedback Team attend team meetings to discuss updates and answer questions.</p> <p>We are also raising the profile of complaints so that colleagues understand the importance of making sure they are dealt with quickly as well as the value that they bring to the organisation in terms of learning and improving the service.</p> <p>This has included:</p> <ul style="list-style-type: none"> • the Complaints and Feedback Team attend team meetings to deliver training and answer questions. • Our Managing Director raising
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				<p>awareness of complaints during whole organisation staff engagement sessions</p> <ul style="list-style-type: none">• Engaging teams across the organisation to self-assess against the Ombudsman's Spotlight Reports.• A dedicated page on our internal website providing guidance on a range of complaint handling subjects including how to log a complaint, the complaints process and how to investigate a complaint. <p>Complaints are high profile in the organisation throughout all levels of management up to Board level. It is recognised as a key service in the business</p>
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				that we must provide for our residents in accordance with regulatory requirements and best practice.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	YES	<p>Complaint volumes have increased significantly since the publication of the Complaint Handling Code in 2020. In 2023/2024 they increased by 10% from the previous financial year.</p> <p>The increase in complaints shows that we have improved accessibility to the complaints procedure and raised awareness of complaints in general, in line with the aspirations of the Complaint Handling Code.</p> <p>Complaint volumes are set out in the Annual Complaints Performance and Service Improvement Report which accompanies this self-assessment.</p> <p>Evidence:</p>	We have reacted positively to these new demands through increasing the resources available for managing complaints, but we continue to review our approach.

			Annual complaints performance & service improvement report Learning Strategy Newsletter articles promoting complaints process and ombudsman service	
3.4	<p>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.</p>	YES	<p>Our Complaints Policy is available electronically on our website and via email. It is also available in printed form and by post.</p> <p>We can also make it available in other formats, such as braille, when required.</p> <p>The policy clearly sets out the two-stage process, including the timeframes for responding.</p> <p>Evidence: TCH website</p>	
3.5	<p>The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.</p>	YES	<p>Part 4 of our Complaints Policy explains that we publicise details of the policy on the dedicated complaints page on our website. It also explains how that page includes links to the Housing Ombudsman Service as well as the Complaints Handling Code.</p> <p>Evidence: TCH Website</p>	<p>We also provide contact details for the Ombudsman Service in any relevant correspondence with residents.</p> <p>We have templates that we use for all relevant correspondence advising residents of their right to</p>

			<p>Newsletter archive on TCH website</p>	<p>contact the Ombudsman Service at any point during the complaints process.</p> <p>We provide the Ombudsman's details when acknowledging and responding at Stages 1 and Stage 2.</p> <p>Ombudsman information is regularly promoted in resident newsletters.</p>
3.6	<p>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.</p>	YES	<p>Part 4 of our Complaints Policy makes it clear that residents should have the opportunity to be accompanied at meetings and represented in bringing a complaint where any such reasonable request is made.</p> <p>Evidence: Complaints Policy</p>	
3.7	<p>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.</p>	YES	<p>As formally mentioned, we have templates that we use for relevant correspondence advising residents of their right to contact the Ombudsman Service at any point during the complaints process.</p>	

			<p>The dedicated complaints handling page of our website also includes a link to the Ombudsman Service.</p> <p>Our website also explains that a resident can contact the Ombudsman at any stage.</p> <p>Evidence: TCH Website</p>	
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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	<p>We have a specialist Complaints and Feedback team which has responsibility for oversight of the complaints process and providing support to all complaint handlers through all stages of the complaints process. The team also provides quality assurance for all complaint responses. 100% of Stage 1 complaints are managed by trained individuals within the relevant service areas to ensure ownership of the complaints is embedded. Our specialist team is also responsible for managing and assigning all Stage 2 complaints to members of the stage 2 group that is made up of managers and leaders from across the organisation.</p> <p>The Complaints and Feedback Team has responsibility for managing and responding to</p>	<p>Complaints are overseen by the Complaints and Feedback Team and Heads of Service to ensure quality and consistency.</p> <p>Our overall approach to complaints is overseen by:</p> <ul style="list-style-type: none"> • Complaints and Feedback Team. The team provides guidance, quality assurance and feedback and suggests improvements. • Executive Management Team, which receives fortnightly information on complaints volumes and Housing Ombudsman cases,

			<p>correspondence with the Ombudsman Service. This team has also increased its resources by two extra members in the last six months.</p> <p>The Complaints and Feedback Team are responsible for the regular reporting of complaints to the Board and associated committees and for overseeing the annual self-assessment and producing the Annual Complaints Performance & Service Improvement Report.</p> <p>The Complaints and Feedback Team has expanded as part of the merger process between Rosebery and TCH.</p> <p>Evidence: Governance structure Chart</p>	<p>and regular reports on the work of the Complaints teams.</p> <ul style="list-style-type: none"> Resident Experience Committee, which is a Board level Committee which includes resident representation, which meets quarterly and reviews quantitative and qualitative information on complaints and Housing Ombudsman findings, and reports to the TCH Board. The Board also receive quarterly reporting on complaints and Ombudsman determinations.
4.2	The complaints officer must have access to staff at all levels to facilitate	YES	Our Customer Feedback and Information Manager works	The Complaints and Feedback Team have

	<p>the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.</p>		<p>closely with colleagues of all levels of seniority across the organisation to facilitate the prompt resolution of complaints. Any outstanding issues or concerns are escalated to EMT if required.</p> <p>The Complaints and Feedback team provides regular training, updates and guidance to ensure all complaint handlers are informed of current expectations and approaches in complaint handling.</p> <p>The team provides guidance and support to ensure complaints are managed with empathy and a focus on resolution and learning, and to reach fair outcomes for our residents at the earliest opportunity.</p>	<p>created a training log in order to document all training and updates delivered.</p>
4.3	<p>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</p>	YES	<p>As previously mentioned in point 3.3. of this self-assessment, we have reacted positively to the ever-increasing volume of complaints through reviewing our</p>	<p>TCH keeps records of Staff Briefings</p>

	core service and must be resourced to handle complaints effectively		resourcing and approach to complaints handling.	
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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	We have adopted our parent Group Peabody's Complaints policy which has recently been revised to reflect the expectations of the latest version of the Complaint Handling Code. Evidence: Complaints Policy	We constantly keep the Complaints Policy under review and recently made amendments as part of the process of self-assessing against the Complaint Handling Code.
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	We have a two-stage internal complaints procedure. We do not operate any additional (informal) stages, and none are set out in our Complaints Policy. Evidence: Complaints Policy	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	YES	As above, we are Code compliant and operate a two stage internal complaints procedure. Evidence: Complaints Policy	

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	N/A	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	N/A	
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	<p>Colleagues are trained to define the complaint and to check their understanding with the resident before providing a response.</p> <p>Colleagues are also trained to understand and set out the desired outcomes sought as part of every written response to a complaint.</p>	<p>All complaint responses are checked by the Complaints and Feedback team prior to sending. Part of the checks focus on whether all complaint points have been addressed. Feedback is provided on all drafts.</p> <p>Our letter templates provide a structured response including the need for the complaint definition and guidance.</p> <p>The Complaints and Feedback Team maintain a tracker of all complaint responses checked.</p>

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>In our acknowledgements we reflect our understanding of what the complaint is regarding. If anything is identified as being something, we cannot consider as a complaint we will inform the resident.</p>	<p>We are currently reviewing whether there is any further training and development that we can provide the team that acknowledges complaints to help them identify areas of exclusion that are clear at that point. Further exclusions do not always become apparent until a Stage 1 investigation has been completed. Stage 1 and Stage 2 responses will always state any aspects of a complaint that we will not investigate and include the reasons why.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	YES	<p>As previously noted, our complaint handlers receive regular training and updates to keep them informed of current expectations and approaches in complaint handling.</p> <p>They are trained to manage complaints with empathy and to reach fair outcomes for our residents at the earliest opportunity.</p>	

			<p>Any investigation takes account of both points of view to ensure a fair and impartial approach is taken. Staff are trained to provide fair opportunity for residents/customers to present their side of any case before a decision is reached.</p> <p>A part of this approach complaint handlers contact customers by telephone to encourage dialogue, build rapport and understand their circumstances and desired outcomes.</p> <p>We have also published an internal Stage one Investigation Framework document that sets out good practice for investigating complaints.</p>	
5.9	c. 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	Colleagues are trained to recognise the importance of regular communication and of keeping residents updated in the event of any extensions to timeframes.	Any training issues identified for team members will be picked up and addressed.

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	YES	<p>TCH has an Equality Diversity and Inclusion Policy which was updated in April 2024 and is published on our website and sets out how we will adjust our normal practices to meet individual customer needs.</p> <p>Where any such arrangements are in place this is flagged on our CRM system alongside any disabilities that a resident may have disclosed.</p> <p>Evidence: Equality Diversity and Inclusion Policy</p>	<p>As TCH are a subsidiary of Peabody Group, we will be adopting their Reasonable Adjustment Policy through a policy alignment process which will be completed by March 2025.</p> <p>TCH will also be reviewing our CRM system in 2024/2025 which will include a review of how adjustments are recorded and presented.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	YES	<p>Part 4 of our Complaints Policy makes it clear that declining to escalate complaints should be the exception, and that a fair and valid reason should be provided in instances where any such decision is taken.</p> <p>Our Policy also sets out that residents must be provided with contact details for the Housing Ombudsman Service if a decision is taken not to escalate a complaint so that it can be challenged.</p>	<p>Through the regular training that we provide, colleagues are reminded that declining to escalate complaints should be an exception and should be discussed with the Complaints and Feedback Team first.</p> <p>Should we identify any instances where discretion has been applied inappropriately it will be picked up as a training issue.</p>

			Evidence: Complaints Policy	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	YES	<p>All information relating to each individual complaint is held in one place on our CRM system.</p> <p>We recognise the importance of good accurate record keeping and are aware that this is a high-profile issue with the Housing Ombudsman.</p>	<p>Good record keeping will continue to be a key focus for our complaints team.</p> <p>Our wider commitment to improve record keeping as an organisation includes initiating a self-assessment against the Housing Ombudsman's Knowledge and Information Management (KIM) Report.</p>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	YES	<p>Our Compensation and Remedies Policy sets out our approach to providing appropriate redress. Colleagues at every stage of the process are empowered to offer redress that is appropriate and proportionate to the shortfalls in service and impact on the resident.</p> <p>Evidence: Compensation and Remedies Policy</p>	<p>TCH has adopted Peabody Group's Compensation and Remedies Policy as part of this self-assessment. It is continuously reviewed to make sure it reflects current expectations and levels of compensation being awarded by the Housing Ombudsman Service.</p> <p>The most recent review of the policy was undertaken in conjunction with this self-assessment to reflect the</p>

				<p>Housing Ombudsman's own Remedies Guidance.</p> <p>Providing effective and appropriate remedies is an area that we always focus on in the regular training that we provide to complaints handlers.</p>
5.14	<p>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.</p>	YES	<p>We have published an Persistent and Vexatious Complainant Policy which sets out what we consider to be unreasonable communication as well as the steps we will take to manage any behaviour that falls within this category.</p> <p>Training has been provided on this policy and any decision to restrict contact is taken by the Assistant Director of Operations and any restrictions are flagged on our CRM system.</p> <p>We also have a Cautionary Contact Policy which has a register of residents and customers who we are engaging with under this policy. The focus of this policy is on other matters such as the need for joint visits.</p>	<p>Reviews of any cases currently being managed under both policies are carried out as they fall due. This includes looking at any current restrictions which may be coming to the end of a review period.</p> <p>TCH are exploring adoption of Peabody Group's Unreasonable Communications Policy in 2024/2025 to replace the Persistent and Vexatious Complainant Policy</p>

			<p>Any evidence, such as relevant correspondence relating to both policies, is stored on our CRM system so that we have an audit trail relating to any decisions we may take.</p> <p>Evidence: Persistent and Vexatious Complainant Policy Cautionary Contact Policy</p>	
5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	YES	<p>The Persistent and Vexatious Complainant Policy makes it clear that any restrictions should be proportionate to the behaviour being reported and appropriate to the individual - showing due regard for the Equality Act.</p> <p>Evidence: Persistent and Vexatious Complainant Policy</p>	<p>Any decision to restrict contact needs to be approved by the Operations Assistant Director and supported by suitable evidence. Having this high-level perspective and degree of experience ensures that decisions to restrict contact are fair, proportionate and appropriate to the person concerned.</p>

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	The complaints handlers will always look to provide a resolution as quickly as possible within the timeframes set out in the Code. If they can provide a response sooner, they are trained to do so.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	YES	This requirement is reflected in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	YES	This requirement is reflected in Part 4 our Complaints Policy. Evidence: Complaint Policy	Colleagues are reminded of this requirement at the regular training we provide.
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	YES	This requirement is reflected in Part 4 of our Complaints Policy Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.

	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.			
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	As above, this requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.
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	Part 4 of our Complaints Policy explains that Complaint responses will not be delayed due to outstanding actions. Rather, our responses will set out a plan for resolving outstanding issues and fulfilling any commitment e.g. to complete repairs. All actions that are agreed to be completed within a complaint's response will be monitored and followed through to resolution with updates to the complainant provided as and when needed. Evidence: Complaints Policy	This is another aspect of complaints management that colleagues are reminded of at the regular training we provide. Any deviation from this will be picked up through the quality checks that we perform and will be addressed as a training issue. We have separate processes in place to monitor any agreed actions following the complaint response being issued. Following a Stage 1 or Stage 2 response, we monitor any agreed actions through to a conclusion.

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	All Complaint Handlers are trained to provide clear explanations for decisions with reference to relevant policy, law and best practice.	<p>The Complaints and Feedback Team review all responses before they are sent to the complainant and provide regular feedback with a focus on learning.</p> <p>As mentioned, the team keeps a log of all responses checked.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	YES	<p>This is reflected in Part 4 of our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	<p>Colleagues are trained to use their discretion to make sure that any additional complaint raised is handled in the most efficient and pragmatic way for the customer.</p> <p>The Complaints and Feedback Team provides support to all colleagues if they require clarification about the best approach in any situation.</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> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; 	YES	<p>Our stage 1 response template outlines the all of these points with additional guidance.</p> <p>All complaint response letters are checked by the Complaints</p>	<p>We will continue to reinforce these requirements at the regular training we provide to colleagues.</p>

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>		and Feedback Team for these points.	<p>Any failure to comply with these aspects of the Code will be picked up and addressed through the regular quality checks that we provide before response letters are sent.</p> <p>As mentioned, the team keeps a log of all responses checked.</p>
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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	<p>This requirement is set out in Part 4 of our Complaints Policy</p> <p>Evidence: Complaints Policy</p>	Colleagues are reminded of this requirement at the regular training we provide
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	YES	<p>This requirement is set out in Part 4 of our Complaints Policy</p> <p>Evidence: Complaints Policy</p>	Colleagues are reminded of this requirement at the regular training we provide
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	YES	<p>This is set out in Part 4 of our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	Colleagues have received training on the new requirements set out in the latest version of the Complaints Handling Code

	unhappy as part of its stage 2 response.			and are aware that residents are not required to provide a reason for wishing to escalate their complaint. We have also adapted our Complaints Policy to reflect any changes as part of the self-assessment process.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	We have a panel of complaint handlers for Stage 2 of our complaints procedure made up of members of the leadership team and managers.	We have set the requirement in our Complaints Procedure that stage 2 complaints will not be allocated to a person from the area responsible for the stage 1 complaint to provide some independence to the process.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	YES	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide
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	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide

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	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.
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	We have already addressed this in our response to section 6.6 above.	
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	All Complaint Handlers are trained to provide clear explanations for decisions with reference to relevant policy, law and best practice.	As per our answer to section 6.7, the Complaints and Feedback Team review all responses before they are sent and provide regular feedback with a focus on learning and this is something that, for the most part, we get right. Any training needs identified have been taken up directly with the caseworkers concerned.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage;	YES	All complaint response letters are checked by the Complaints and Feedback Team for these points.	As per our response to section 6.9, we will continue to reinforce these requirements at the regular

	<ul style="list-style-type: none"> b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 			training we provide to colleagues. Any failure to comply with these aspects of the Code will be picked up and addressed through the regular quality checks that we provide.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	YES	We have a separate team managing responses at Stage 2 of the complaints procedure.	<p>Our Stage 2 complaint handlers receive regular training on all aspects of complaint handling good practice.</p> <p>This includes updates from any expected changes of approach highlighted by Housing Ombudsman Spotlight Reports as well as any issues highlighted through Ombudsman determinations.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	YES	<p>Our Compensation and Remedies Policy sets out our approach to providing appropriate redress.</p> <p>Part 4 of that policy specifies how an effective remedy should include several factors such as an apology, explanation and demonstration of learning. It also encourages colleagues to take a broader approach to remedies and consider whether there are any actions that can be taken instead of, or in conjunction with, an offer of compensation to put things right.</p> <p>Evidence: Compensation and Remedies Policy</p>	<p>As stated in part 5.13 of this self-assessment, we keep our Compensation and Remedies Policy under constant review to make sure it reflects current expectations and levels of compensation being awarded by the Housing Ombudsman Service.</p> <p>TCH has adopted Peabody Group's policy which was reviewed in conjunction with this self-assessment and the policy now mirrors the monetary awards set out in the Housing Ombudsman's own Remedies Guidance.</p> <p>Providing effective and appropriate remedies is an area that we always focus on in the regular training that we provide to the complaints team.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	One of the aims set out in the Compensation and Remedies Policy is to provide remedies that are fair and an accurate reflection of the shortfalls in	Awards of compensation are checked by the Complaints and Feedback Team as part of the response checking to

			<p>service and detriment experienced by a resident.</p> <p>Evidence: Compensation and Remedies Policy</p>	<p>ensure awards are considered, appropriate and consistent.</p>
7.3	<p>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.</p>	YES	<p>If the remedy involves completing a task or action, we will clearly set out a plan of action for completing what has been agreed.</p> <p>All complaint handlers are responsible for monitoring an action agreed in their response and it is made clear that they will remain the point of contact unless agreed otherwise in which case the resident will be provided with a new point of contact.</p>	
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	YES	<p>As noted above, our current Remedies and Compensation Policy is based on the Ombudsman's own Remedies Guidance and the levels of compensation we have observed being awarded following formal investigations.</p> <p>Evidence: Compensation and Remedies Policy</p>	

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> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	YES	<p>Our Annual Complaints Performance and Service Improvement Report has been submitted alongside this self-assessment and includes all the information listed in points a to f.</p> <p>Evidence: Annual Complaints Performance and Service Improvement Report</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	<p>Our Annual Complaints Performance and Service Improvement Report has been published on the dedicated complaints handling page of our website alongside the self-assessment.</p> <p>The report has been scrutinised by our governing body which has commented on the content as a pre-face to the report.</p> <p>Evidence: TCH's website Annual Complaints Performance and Service Improvement Report</p>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	We merged with Rosebery HA in April 2023 and are currently in the final stages of completing the integration of services. That integration coincides with this self-assessment and all areas of the new business have been included.	We are aware of this requirement and will undertake any self-assessments outside the annual requirement accordingly.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	We will comply with any request to update the self-assessment as directed by the Housing 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	We will comply with this requirement should such a situation arise.	The senior leadership team is aware of its obligations to comply with the Complaint Handling Code and will take responsibility for providing any such updates to residents and the Ombudsman Service should this situation arise.
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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	<p>We recently strengthened our approach to learning from complains as part of our Complaints Improvement Plan. We have set up a new process to ensure that we capture learning opportunities and action them according to priority.</p> <p>Learning opportunities are also identified from several sources including Housing Ombudsman determinations, Housing Ombudsman Spotlight Reports and Housing Ombudsman 'special' investigations into other landlords.</p> <p>All recommendations are shared with appropriate areas of the business during regular Lessons Learned meetings to review, and we will add those that are both viable and most urgent to our Complaints Improvement Plan.</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	See response to section 9.1 above.	
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	<p>We share learning from complaints through our websites and newsletters to residents.</p> <p>Our Resident Scrutiny panels have access to complaints performance and are currently doing a 'deep dive' review of the complaints process with a focus on the lessons learned process.</p> <p>Board and our Resident Experience Committee will receive periodic reporting around lessons learned from complaints.</p>	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	YES	<p>Our Director of Operations is accountable for TCH's complaint handling.</p> <p>Complaints are regularly monitored with weekly and monthly reports on complaints performance and Ombudsman</p>	

			<p>contact being provided to our Executive Team.</p> <p>Any themes and trends identified inform the training that we regularly provide our complaints team as noted previously.</p>	
9.5	<p>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').</p>	YES	<p>We have appointed a member of the governing body who has lead responsibility for the regular reporting of complaints.</p>	
9.6	<p>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.</p>	YES	<p>We currently send quarterly reports on complaints to the Resident Experience Committee which is a sub-committee of our Board and includes TCH Board members.</p> <p>We provide weekly reports on volumes to our Executive Team.</p> <p>We also to the Executive Team on determinations received as we receive them and provide a quarterly Customer Experience Committee report providing an update on year to date</p>	

			<p>determinations received and outcomes.</p> <p>We regularly report on complaints to a high level within TCH. This involves quarterly reports to our Resident Experience Committee (which includes members of our Board) and monthly and weekly operational reports monitoring active complaints.</p>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>	YES	<p>The MRC and the Board receive quarterly updates on performance on complaints including all the requirements set out in b, c and d.</p>	

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	YES	From 2024, all colleagues involved in managing complaints will have these objectives in place.	
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