

RELIANCE SOCIAL HOUSING CIC

Report To/Meeting	Board	Date of Meeting	Out of cycle Oct 2024
Report Title:	Complaints Annual Review for 23/24		
Purpose of the report	<p>The report looks at performance of complaints during the year 2023 / 2024.</p> <p>It also reflects on the Housing Ombudsman Self-assessment previously presented, reviewed and approved by board in September.</p> <p>Following changes to our reporting mechanism as well as changes to our policy review following the Ombudsman self-assessment, the method of reporting changed. This has had an impact on the yearly figures which is reflected in the narrative.</p>		
Decision Action:	<i>For Discussion - For Approval</i>		
Executive Summary	<p>The report sets out activities of the tenant support complaints department for 2023/24</p> <p>The report breaks down our complaint's figures in line with Reliance expectations.</p> <p>The Housing Ombudsman Self-assessment is presented with this report as a reminder of both compliance and outstanding areas of improvement.</p>		
No of Pages	29	Appendixes	1
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Report Sponsor	Kerry Hall, Head of Operations	Presenter:	Hasham Arif – Tenant and Support Manager

1. Background and Introduction

- 1.1 This report captures all dissatisfaction with our services that were reported during 2023/2024.
- 1.2 Q4 saw a new complaints report developed in line with the complaints policy review and self-assessment ensuring we are recording and taking action to improve the quality and level of service we are providing to our residents. This has had an impact on the overall figures as the first three quarters of the year were recorded in a different manner.

2. Complaints performance during 2023 / 2024

- 2.1 When things go wrong, it's important that Reliance works hard to put it right. It's even more important that we learn from it to prevent it from happening again. Reliance knows that it can do more to learn from complaints, therefore staff have been working to identify common causes for complaints. During the year there has been a lot of work with stakeholders to both reduce possible causes of complaints and ASB as well as resolve the complaints that do arise. For example:

- WM Police have worked closely with Reliance in ensuring service provision is a safe and secure environment for our residents. They have also worked in partnership with us in different areas, to counsel us of any risks our provision or residents may be exposed to and worked with us in reducing these risks.
- Our continued partnership with the Local Authority helps support us in identifying any risk of complaints and working to reduce any concerns raised directly with the Local Authority.

3. Key points

3.1 Below are the statistics for the year:

430 Complaints/dissatisfactions of service were received within the year

428 Complaints/dissatisfactions of service were resolved at first point of contact.

334 Stage One complaints were received.

1 Stage Two complaints were received.

99.31% of complaints were responded to within target time.

2 Complainants were dissatisfied with outcome or action taken.

1 Complaint was escalated to the Housing Ombudsman

1 Ombudsman determination was received

99 complaints related to repairs and maintenance.

36 complaints related to care, support and supervision.

87 complaints related to a failure to follow policy and procedure

3.2 During 2023 -24 the organisation dealt with 430 complaints, and Quarter four saw the introduction of an Early Resolution, Service Requests and a Two Stage complaints process in line with the Ombudsman Code and we worked with our residents and contractors to ensure satisfactory outcomes can be reached before escalation. This has given the department reassurance that the work in promoting our complaints policies and procedures is empowering our service users to access us more successfully. We are accessible to our service users by telephone, website, WhatsApp, twitter, resident panel and direct 0800 number.

3.3 We are working with our partners and external companies in finding new methods of communication for our residents. Our CLO's and complaints department continues to build strong relationships with our partners at BCC, WMP, Probation Services, Social Services and Homeless action teams within our communities. We are also working very closely with local neighbourhood policing actions teams to reduce risk of any negative impact our provision may be having on residents from areas within our scheme. Where it is highlighted that tenants or the provision is having a negative impact on communities, we are working together in a multiagency approach to safeguard our tenants and communities. Where it has been evidenced that our provision is having a negative impact on communities and service users, we are taking action to remove provision. We have continued our implementation of property caps on a number of areas within Birmingham since 2022 thus allowing us to focus on the quality of service rather than growth, so we can ensure the service being provided to our service users are in line with the scheme requirements.

3.4 We review our complaints figures quarterly to recognise trends and concerns within properties, areas, and tenants which we then use to risk assess and implement the necessary mitigation to reduce the impact properties and potentially tenants are having within communities

- 3.5 Quarter Four was the first time ASB was recorded separately but the yearly totals were:
- 98 new ASB cases were reported
 - None of the new ASB cases reported involved hate incidents
 - There were 94 resolved ASB cases
- 3.6 There were 73 safeguarding cases during the year all of which have since been resolved. The end of the year saw a reduction in the number of safeguarding cases identified and reviewed. This has mostly been down to the training given to our staff to ensure they are aware and have a better understanding of the difference between complaints, safeguarding and incidents.
- 3.7 During the year 121 incidents were reported. All but 15 were resolved and within target. Those outstanding were raised within quarter four and were still within the resolution target time.
- 3.8 Unfortunately there were 12 deaths in service, but none needed to be escalated.

4. Conclusion and Recommendation

- 4.1 As targets are set for 24/25 and reporting continues over the quarters, it will be possible to see the direction of travel and any areas of improvement. Future reports will report by exception, highlighting best practice and concerns. In turn this will feed into the regular reporting of the Tenant Satisfaction Measures for both social housing and how Reliance has applied them to its non-social housing.
- 4.2 Going forward Reliance will
- Continue its close work with its external partners ensuring that our ethos is delivered by being approachable and proactive.
 - Continue to be accessible to its residents and seeking ways to improve accessibility.
 - Ensure any complaint or concern raised is reviewed ethically and fairly in line with the Housing Ombudsman Code.
- 4.3 The Tenant and Support Department recommend
- Reliance continues building stronger relationships and partnership work with its external partners and stakeholders
 - Reliance continues working on strategies in being able to be more open and willing with its residents and communities especially when addressing concerns or complaints.
 - Build on and develop the complaints and CLO department through training and recruitment.
- 4.4 Having received the quarter four report and approved the results of the Housing Ombudsman self-assessment, Members are asked to note and approve the annual report so it may be published on the Reliance website.
- 4.5 It is a regulatory requirement that along with the Housing Ombudsman self-assessment, this report and the Board's response is published on the organisation's website. Members are asked to delegate authority to do this to the Company Secretary.

appendix 1

Complaints self-assessment (Housing Ombudsman)

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>Complaints policy page 2, paragraph 8</p> <p><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></p>	As evidenced the complaints policy reflects this point
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>Complaints policy page 3, paragraph 1</p> <p><i>“A complaint will be raised when the customer raises dissatisfaction...”</i></p> <p>Complaints policy page 4, paragraph 2</p> <p><i>“A member of staff has triggered the formal complaints process with the agreement of the customer to reach a resolution”</i></p> <p>Complaints policy page 4, paragraph 3</p> <p><i>“Complaints are welcomed from all customers, their advocates, representatives or third parties affected by Reliance services.”</i></p>	As evidenced the complaints policy reflects this point. Staff training updated 2024 to ensure the policy and practices are embedded
1.4	Landlords must recognise the difference between a service request and a complaint.	Yes	Complaints page 3, paragraph 1	As evidenced in the complaint policy, under the section titled

	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.		<i>“A service request, where the customer is letting us know about a particular issue for the first time; for example, reporting a repair or an incident of anti-social behaviour. Service requests will be recorded, monitored and reviewed regularly. A complaint will be raised when the customer raises dissatisfaction with the response to their service request”</i>	“What is not a complaint” the attached quote outlines the difference between a service request and a complaint
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints policy page 3, paragraph 1 <i>“A complaint will be raised when the customer raises dissatisfaction with the response to their service request”</i>	As evidenced the complaints policy reflects this point
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	Complaints policy page 1, paragraph 2 <i>“We encourage feedback by providing different channels through which customers can easily make a complaint.”</i>	Complaints can be submitted through email, social media, phone calls, website, community liaison officers, our 0800 number, notice boards, our resident satisfaction team or any other member of staff

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	Complaints policy page 2, subheading 2 <i>“What is not a complaint – Exclusions”</i>	Under this subheading a list of exclusions has been outlined
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. 	Mostly	<p>Complaints policy page 2 and page 3</p> <ul style="list-style-type: none"> • <i>A comment, or series of comments, where the customer is making a suggestion about how we may improve or maintain our service</i> • <i>A question, or series of questions, where a customer is requesting information about a service we provide</i> <ul style="list-style-type: none"> • <i>A service request, where the customer is letting us know about a particular issue for the first time; for example, reporting a repair or an incident of anti-social behaviour.</i> <p><i>Service requests will be recorded, monitored and reviewed regularly. A complaint will be raised when the customer raises dissatisfaction with the response to their service request</i></p> <ul style="list-style-type: none"> • <i>The issue giving rise to the complaint occurred over six months ago unless the complaint relates to safeguarding or health and safety issues</i> 	Point 1 – Our policy considers any complaint that is dated 12 months prior to its acknowledgment

			<ul style="list-style-type: none"> • <i>Legal proceedings have been started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court</i> • <i>Matters that have already been considered under the Complaints Policy</i> 	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	No	<p>Complaints policy page 2</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over 12 months ago unless the complaint relates to safeguarding or health and safety issues 	Our policy considers any complaint that is dated 12 months prior to its acknowledgment
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>Complaints policy page 2, 3.2</p> <p><i>“When we decide not to accept a complaint, we will provide an explanation setting out the reasons why the matter is not suitable for the complaints process. Customers have the right to challenge this decision by making an approach to the Housing Ombudsman.”</i></p>	As evidenced the complaints policy reflects this point
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>Complaints policy page 2, 3.2</p> <p><i>“When we decide not to accept a complaint, we will provide an explanation setting out the reasons why the matter is not suitable for the complaints process.”</i></p>	The individual circumstances of each complaint are considered as a personalised justification is to be provided in each circumstance where a complaint is excluded

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 policy page 5, paragraph 2</p> <p><i>“We will make it easy for our customers to make a complaint in a way that is the most convenient for them, this could be in writing, over the telephone, via text or email or in person to a member of Reliance staff.”</i></p> <p>Complaints policy page 5, paragraph 2</p> <p><i>“We will respond to reasonable adjustments requests in line with the Equality Act...”</i></p>	As evidenced Reliance endeavours to provide different channels through which residents may raise a complaint in line with the Equality Act 2010
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Complaints policy page 5, paragraph 2</p> <p><i>“...to a member of Reliance staff.”</i></p>	As evidenced the complaints policy reflects this point. All staff under the tenant and support department are given training and guidance on our complaints policy as well as having complaints training courses conducted
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Complaints policy page 2, paragraph 1</p> <p><i>“...customer complaints, which allow us to learn from experiences... make amendments to our working practices... We encourage feedback by providing different channels through which customers can easily make a complaint.”</i></p>	As evidenced the policy highlights how complaints provide an avenue of learning and allow working practices to be improved. Noticeboards are mandatory in all properties under our provision where there is easy access to ways in

				which complaints can be made. (ref: 1.6)
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Partial	Website, Welcome pack, available in different formats.	Complaints policy review currently under development is easy read and alternative languages.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints policy page 2, paragraph 5 <i>"Reliance has completed its self-assessment against the Housing Ombudsman's Complaint Handling Code, which promotes the progressive use of complaints and provides a useful framework to support effective handling and prevention of complaints. This will be uploaded onto our website in due course and will be reviewed annually"</i>	As evidenced the complaints policy reflects this point. The is available on the website Social Housing Reliance Social Housing England (reliancehousing.co.uk)
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints policy page 2, paragraph 1 <i>"... from customers and their representatives"</i> Complaints policy page 4, paragraph 3 <i>"Complaints are welcomed from all customers, their advocates, representatives or third parties affected by Reliance services."</i>	As evidenced the complaints policy reflects this point

3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints policy page 6, paragraph 1 <i>“...Ombudsman Service throughout their complaint, not only when the landlord’s complaints process is exhausted. Making a referral to the Ombudsman is free and further details can be found at: http://www.housing-ombudsman.org.uk/”</i>	As evidenced the complaints policy reflects this point. Ombudsman information can also be found on our website
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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	Complaints policy page 5, paragraph 1 <i>"...will be co-ordinated by our dedicated Complaints Officer"</i>	A dedicated complaints team is in place and each case is assigned to a dedicated complaints officer
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints policy page 3, paragraph 9 <i>"...empower our staff to resolve any concerns"</i>	Complaint officers undergo the relevant training to ensure they have the autonomy and initiative to resolve complaints promptly and fairly in accordance with our Complaints policy and procedure
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaints policy page 3, paragraph 10 <i>"Reliance also recognises that that every customer interaction represents an opportunity for to gain feedback and insight. We will record all complaints on our system and run regular reports from the system to identify if there are any trends in</i>	Monthly and Quarterly reports allow senior management and board members to have oversight into the complaints department. Independent surveys are also carried out with tenants to identify concerns around complaints.

			<i>customer dissatisfaction and any lessons that can be learnt."</i>	Staff also have undergone training: Conflict resolution Course, Training on Complaints Policy and Procedure, Anti-Social Behaviour Policy and Safeguarding Training
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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	The complaints policy can be found on the website	Policy and procedure reflect this point. Reliance reviews all complaints inline with its complaints policy which is inline with the Housing Ombudsman
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	Complaints policy page 5, paragraph 1 <i>"The process has 2 stages..."</i>	Our complaints policy covers two stages of any complaint. Stage 1 - Complaints officers Stage 2 – Manager
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	Complaints policy page 5, paragraph 1 <i>"The process has 2 stages..."</i>	Our complaints policy covers two stages of any complaint. Stage 1 - Complaints officers Stage 2 – Manager

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.	N/A	MA's are fully aware of our complaints process and are only authorised to manage early resolution and have to escalate anything stage 1 to the complaints department.	Our managing agents are addressing early resolution only.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our Managing Agents are inline with our Policy	All Managing Agents are required to ensure our policy and procedure is embedded within their framework of complaints handling
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	Complaints policy page 5, paragraph 3 <i>"The Complaints Officer will set out their understanding of issues and the outcomes the customer 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."</i>	This is the code followed within out complaint policy and implemented within our procedures.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaints policy page 5, paragraph 3 <i>"The Complaints Officer will set out their understanding of issues and the outcomes the customer 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."</i>	This is the code followed within out complaint policy and implemented within our procedures.

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul 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>Reliance staff are trained in complaints handling and impartiality. Updated training sessions are held with all complaint's handlers</p>	<p>Staff also have undergone training: Conflict resolution Course, Training on Complaints Policy and Procedure, Anti-Social Behaviour Policy and Safeguarding Training</p>
5.9	<p>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.</p>	Yes	<p>Complaints policy page 5, paragraph 4 <i>"We will provide a full written response within ten working days. If this is not possible, an explanation and a date when the stage one response will be received will be communicated."</i></p>	<p>Any extension on a complaint is relayed back to the complainant in writing for a request of extension outlining the reasons to why.</p>
5.10	<p>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.</p>	Yes	<p>Complaints policy page 5, paragraph 2 <i>"We will respond to reasonable adjustments requests in line with the Equality Act..."</i></p>	<p>The Complaints Policy sets out that Reliance will ensure that disabled people are not disadvantaged in accessing its services. Reliance make reasonable adjustments and will adapt the normal Complaints policy and procedure to</p>

				accommodate an individual's needs in line with the Equality Act and the Reliance Complaint handlers have had training to deal with such requests
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	Complaints policy page 5, paragraph 6 <i>"If all or part the complaint is not resolved to the customer's satisfaction at stage 1, the customer can request a review of the complaint within 10 days of receipt of the outcome unless an exclusion ground applies. If Reliance declines to escalate a complaint based on the exclusions listed above in "What is not a complaint", we will set out the reasons for this in writing and also advise of the customers right to approach the Ombudsman about this decision."</i>	The Policy addresses this requirement.
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	Evidenced in our complaints database/ folders	Our complaints database records the aforementioned details
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords	Yes	Complaints Policy, Process and SOP's addresses this requirement.	The Policy addresses this requirement.

	must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			Complaints officers have the authority to apply remedies that are appropriate and justified to resolve complaints at an early stage
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	ASB Policy Unreasonable Behaviour Policy Residents Licence Agreement	This is evidenced in our ASB Policy, Unreasonable Behaviour Policy and Our Residents Licence Agreement
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Unreasonable Behaviour policy	The restrictions at Reliance are set out in the Unreasonable Behaviour policy

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	Early Resolution and stage 1 complaints managed by complaint handlers. Policy page 3, 4.0	Complaint officers are trained to consider factors of every complaint and offer early resolutions such as apologies and early intervention.

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	Complaints policy page 5, paragraph 2 <i>"The complaint will be acknowledged within two working days."</i>	This is set out in the Complaints Policy
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints policy page 5, paragraph 4 <i>"We will provide a full written response within ten working days"</i>	This is set out in the Complaints Policy
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints policy page 5, paragraph 4 <i>"We will provide a full written response within ten working days. If this is not possible, an explanation and a date when the stage one response will be received will be communicated. This should not exceed a further 10 working days without good reason."</i>	This is set out in the Complaints Policy
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	Policy page 4 5.1 and 5.2	Letter template for extensions
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	This is set out in the complaints form, attached to complaints policy as appendix 1	This is set out in the Complaints Policy as appendix 1

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	Response template used by case handlers prompting to provide relevant information.	Letter templates are used as a guide for staff, currently being developed using ombudsman's outcomes as a guidance.
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	Complaints policy page 5, paragraph 5 <i>"Where a customer introduces new information or raises additional complaints during the investigation, these will 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 will be logged as a new complaint."</i>	The Complaints Policy details this.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; 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 stage 2 if the individual is not satisfied with the response.	Yes	Complaints policy page 4, paragraph 5 <i>"At the completion of each stage of the complaints process we will ensure that customers are communicated with and advised of the following information:</i> • <i>the complaint stage</i> • <i>the outcome of the complaint</i> • <i>the reasons for any decisions made</i> • <i>the details of any remedy offered to put things right</i> • <i>details of any outstanding actions</i> • <i>details of how to escalate the matter if dissatisfied"</i>	The policy adheres to the code requirement and Reliance staff use Ombudsman letter templates as a guide.

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	Complaints policy page 4, paragraph 5 <i>"Stage 2 Review - If all or part the complaint is not resolved to the customer's satisfaction at stage 1, the customer can request a review of the complaint within 10 days of receipt of the outcome..."</i>	This is set out in the Complaints Policy
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaints policy and procedure page 4 and 5	Policy is aligned with complaints code 2024
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	<i>Complaints policy page 5 "A senior Manager will set out their understanding of issues that have not been resolved and the outcomes the customer is seeking."</i>	This is set out in the Complaints Policy
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy page 5, paragraph 7 <i>"A senior Manager..."</i>	Stage 1 is addressed by a complaints officer and Stage 2 is to be addressed by a senior manger
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints policy page 5, paragraph 8 <i>"...completed within 20 working days of the request."</i>	This is in line with the Housing Ombudsman code
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint	Yes	Complaints policy page 5, paragraph 8	This is in line with the Housing Ombudsman code

	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.		<i>"If this is not possible, an explanation and a date when the stage two response will be received will be communicated. This should not exceed a further 10 working days without good reason"</i>	
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	Extension letter templates includes the required information.	Being reviewed at present inline with code updates.
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.		This is set out in the Complaints Policy, Process and Appendix 1	Appendix 1 in policy.
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	This is set out in the Complaints Policy, Process and Appendix 1 Response template used by case handlers prompting to provide relevant information.	Appendix 1 Letter templates are used as a guide for staff, currently being developed using ombudsman's outcomes as a guidance.
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; 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;	Yes	Complaints policy page 4, paragraph 5 <i>"At the completion of each stage of the complaints process we will ensure that customers are communicated with and advised of the following information:</i> • <i>the complaint stage</i> • <i>the outcome of the complaint</i> • <i>the reasons for any decisions made</i>	This is in line with the Housing Ombudsman code

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>		<ul style="list-style-type: none"> • <i>the details of any remedy offered to put things right</i> • <i>details of any outstanding actions</i> • <i>details of how to escalate the matter if dissatisfied</i> 	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.		<p>Complaints policy page 4, paragraph 5</p> <p><i>"The senior Manager will then consider the initial findings of the complaint investigation and may choose to take further action."</i></p>	This is set out in the Complaints Policy

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • 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>Complaints policy page 5, paragraph 6</p> <p><i>"Reliance will consider the following actions to put things right:-</i></p> <ul style="list-style-type: none"> • <i>acknowledging where things have gone wrong</i> • <i>providing an explanation, assistance or reasons</i> • <i>apologising</i> • <i>taking action if there has been a delay</i> • <i>reconsidering or changing a decision</i> • <i>amending a record</i> • <i>providing a financial remedy</i> • <i>changing policies or procedures"</i> 	This is in line with the Housing Ombudsman code

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy page 4 “Complaints can be resolved in a number of ways. Any proposed remedy will reflect the extent of service failure and the level of detriment caused to the customer as a result”	This is set out in the Complaints Policy
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints policy page 4 “Complaints Outcome”	This is set out in the Complaints Policy
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Related policy, Documents, Legislation for the Complaints Policy is: <ul style="list-style-type: none"> • Regulator of Social Housing - Consumer Standards - Tenant Involvement and Empowerment Standard • Housing Ombudsman Complaint Handling Code • Reliance Anti-Social Behaviour Policy 	The complaints policy is built upon the legislation listed, one of which is the Housing Ombudsman Complaint Handling Code

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:	Yes	Complaints policy page 6 “Reporting Structure and Learning Points”	The quarterly reports to Board have been provided since 2022 and are embedded in the governance framework.

	<p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</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	Complaints policy page 6 "Reporting Structure and Learning Points"	The quarterly reports to Board have been provided since 2022 and are embedded in the governance framework
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Website	Most recent Self-Assessment Is shared on the Reliance website May 2023.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	This will take place should the ombudsman request this	This is being carried out in 2024
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances,	Yes	Policy page 5, 4	Policy and letter template.

	<p>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.</p>			
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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	Complaints policy page 6, paragraph 6 <i>"We will continue to monitor and share trends arising from complaint handling and any learning or changes made as a result of complaints."</i>	This is in line with the Housing Ombudsman code
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	Complaints policy page 6, paragraph 6 <i>"We will continue to monitor and share trends arising from complaint handling and any learning or changes made as a result of complaints."</i>	This is in line with the Housing Ombudsman code
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	Reports to be published in 2024 on website and Complaints cases will be reviewed as part of the resident's panel.	New website and resident's panel.
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	Yes	Department Manager and Head of Operations.	Department Manager and Head of Operations.

	policies and procedures that require revision.			
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Board Member (COO)	Board Member (COO)
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Board Member (COO)	Board Member (COO)
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	Within current reports monthly, quarterly, yearend.	Within current reports monthly, quarterly, yearend.
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:	Yes	Internal Framework	All departments are trained in our complaints policy. Complaints officers undergo additional training throughout

	<p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>their employment. Regular reviews are done on our systems to ensure there is an equal and impartial response to all complaints in line with our policy which is in line with the Ombudsman code.</p>
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