Appendix 1

Code Provision	Code Requirement	Commentary / Observations	Recommendation
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.	Section 2.1 of the complaints policy states: "Sometimes it may be appropriate to deal with a customer query as a service request rather than a formal complaint, such as where action can be taken immediately to resolve an issue, or when a customer does not want to pursue the matter formally. When this occurs, this will be on agreement with the customer, or upon their request, and will not exclude the customers right to pursue a formal complaint should they wish." Section 2.2 of the complaints report states: "We will not consider as a complaint or any expression of dissatisfaction which relates to: A first-time customer service request. It's important we have an opportunity to provide a response or resolve our customer's issues."	The landlord should review its complaints policy to ensure that it clearly explains the distinction between the landlord's use of service requests and complaints. Section 2.1 states a customer query may be dealt with as a service request when a customer does not want to pursue the matter formally. This is not in line with Section 1.4 of the Code. The landlord may wish to reconsider its terminology when revising its policy. References to complaints as being formal or informal may cause confusion. It is not appropriate for the landlord to have an informal complaint process.

A first-time customer service request. It's important we have an opportunity to provide a response or resolve our customer's issues." The complaints policy does not make reference to whether a complaint raised will	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.	Section 2.1 of the complaints policy states: "If a customer is not satisfied with the response or resolution offered for a service request, this will then be raised as a complaint." In its self-assessment the landlord said this could be evidenced in 2.2, however this stated: "We will not consider as a complaint or any	The landlord should review its complaints policy to ensure it clearly explains that if a complaint is raised as a result of a resident being dissatisfied with the response to their service request, it will not prevent/stall or impact on any issues needed to resolve an immediate issues(i.e. the service request).
not prevent/stall or impact on any actions needed to resolve any immediate issues, such as the service request.		resident complains.	could be evidenced in 2.2, however this stated: "We will not consider as a complaint or any expression of dissatisfaction which relates to: A first-time customer service request. It's important we have an opportunity to provide a response or resolve our customer's issues." The complaints policy does not make reference to whether a complaint raised will not prevent/stall or impact on any actions needed to resolve any immediate issues, such	inimediate issues(i.e. the service request).

- 2.2 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:
 - 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.

In the self-assessment the landlord states this can be evidenced in 2.3 of its policy, but this relates to other matters.

Section 2.2 of the complaints policy lists the circumstances in which a matter will not be considered as a complaint or be escalated, and states:

"We will not consider as a complaint or any expression of dissatisfaction which relates to:

- Matters already being dealt with by the Housing Ombudsman service that has already gone through the Alliance Homes complaints process.
- A first-time customer service request. It's important we have an opportunity to provide a response or resolve our customer's issues.
- Liability issue that is subject to an insurance claim.
- An anti-social behaviour (ASB) or Tenancy Management case that has not yet reached resolution, unless the complaint concerns the management of the case. We will manage cases of neighbour disputes or complaints of ASB through our ASB case handling process.
- The level of rent or service charge that is being charged (unless wrongly applied).
- Disagreement with a decision we have made where there is another procedure involved in the decision, such as a dispute about service charges, successions or right to repair.
- Where the complaint is being pursued in an unreasonable manner.
- A matter that was not raised within 12 months of its occurrence or has already been fully considered.
- A complaint that falls under the Alliance Homes unacceptable behaviour policy.

The landlord should review its complaints policy to clarify the meaning around "right to repair", as without any context, this may cause confusion for residents.

The landlord has a separate section relating to its legal process and may wish to include this into the exclusions sections, noting the wording of this section of the code, which states "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."

The landlord should ensure that if it wishes to exclude such complaints from the complaint procedure, its unacceptable behaviour policy contains a section which explains a resident has a right to appeal and also a right to independent review by the Ombudsman.

A recommendation relating to "A matter that was not raised within 12 months of its occurrence or has already been fully considered" has been made under section 2.3 of this assessment.

	Section 2.2.2 of the complaints policy also states: "2.2.2. Legal complaints process: We will wherever possible, continue to engage with our customers when a complaint or damp and mould issue has the potential to become a disrepair case. We will continue to progress the complaint until the court papers have been issued, at which point the court case takes precedence. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. We will ensure throughout this process that required repairs are progressed in an appropriate timeline."	
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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.	In the self-assessment the landlord states this can be evidenced in 2.3 of its policy, but this relates to other matters. Section 2.2 of the complaints policy states: "We will not consider as a complaint or any expression of dissatisfaction which relates to: • A matter that was not raised within 12 months of its occurrence or has already been fully considered" The policy does not confirm if the landlord will accept complaints made outside of this time limit, or if this includes the resident being made aware of the issue.	The landlord should review its complaints policy to specifically reference in the exclusion that complaints referred to it within 12 months of the resident being made aware of the issue will be included, and it will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	In its self-assessment the landlord has referenced 3.2 of its policy as evidence, but this relates to another matter. The landlord also states in its self-assessment that its welcome pack for new customers is being refreshed and will also include this information. The complaints policy does not reference how the landlord will publicise the policy.	The landlord should review its complaints policy to ensure it explains how the landlord will publicise it.

5.2	5.2 - The early and local resolution of	The landlord confirms in its self-assessment it	The landlord should review its complaints
5.3	issues between landlords and residents is	has a 2 stage process with no pre-complaint	policy and the language used around the word
	key to effective complaint handling. It is not	stage.	"formal". References to complaints as being
	appropriate to have extra named stages		formal or informal may cause confusion. It is
	(such as 'stage 0' or 'informal complaint')	Section 2.3.4 of the complaints policy states:	not appropriate for the landlord to have an
	as this causes unnecessary confusion.	"We have a formal process for handling	informal complaint process.
	E 2 A presence with more than two stores	complaints to ensure consistency of response.	Diagram and the recommendation under costion
	5.3 - A process with more than two stages	This is a two-stage process that refers the customer to the Housing	Please see the recommendation under section
	is not acceptable under any circumstances as this will make the complaint process	Ombudsman Service if the matter is	1.4 about clarifying what is a service request and what is a complaint.
	unduly long and delay access to the	unresolved."	
	Ombudsman.	diff Oblived.	
		The complaints policy lists a two stage	
		process.	
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		Section 2.2.4 of the complaints policy states:	
		"Initial queries will always seek to be resolved	
		by one of our teams where possible before a	
		formal complaint is recorded."	
		Section 2.1 of the complaints policy states:	
		"Sometimes it may be appropriate to deal with	
		a customer query as a service request rather	
		than a formal complaint, such as where action	
		can be taken immediately to resolve an issue, or when a customer does not	
		want to pursue the matter formally."	
		want to pursue the matter formally.	

5.6 5.7	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.
	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.

In its self-assessment the landlord states: "The complaints team are trained to ask for this information when acknowledging the complaint at either stage 1 or stage 2 of the process. This also forms part of the acknowledgement letter that is sent to the customer which confirms our understanding of the complaint and the outcomes the customer is seeking."

Section 2.3.5 of the complaints policy, relating to Stage 1, states:

"All complaints will be acknowledged within five working days and thereafter processed as quickly as reasonably possible, and within the timescales stated in the Complaints procedure."

On page 1 of the complaints procedure document, relating to Stage 1, it states: "We will acknowledge all complaints within 5 working days in a method of communication that has been agreed with you."

On the landlords website, for Stage 1, it states: "Within five working days of your complaint being raised, a Customer Complaints Advisor will contact you to discuss your concerns and explore the outcome and resolution you are looking for. This will then be followed up by an acknowledgement letter or email."

Section 2.3.5 of the complaints policy, relating to Stage 2, states:

"Any stage 2 complaints will be acknowledged, defined, and logged within 5 working days of an escalation request."

Page 2 of the complaints procedure document, relating to Stage 2, states:

The landlord should review its complaints policy for both Stage 1 and Stage 2 and ensure the policy clearly explains that an acknowledgement for Stage 1, or upon escalation to Stage 2, will set out in writing the landlord's understanding of the complaint, the outcomes the resident is seeking, and which aspects the landlord is or is not responsible for. The landlord should also explain in its policy that if any aspect of the complaint is unclear it will ask the resident for clarification.

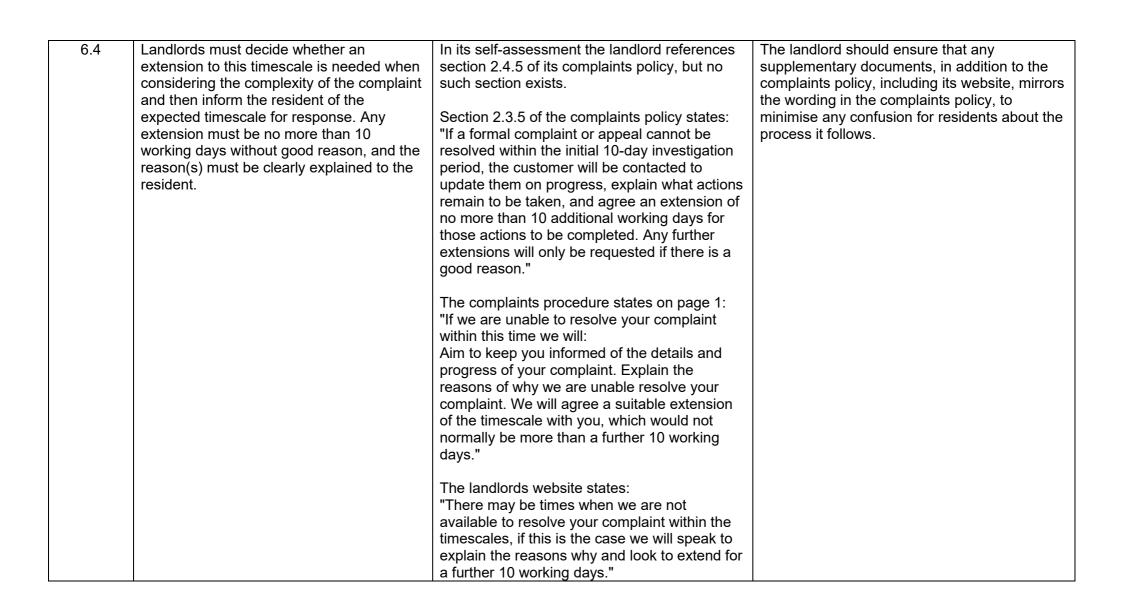
The landlord should ensure that the complaints policy, the complaints procedure, and what it publishes on its website all contain the same information, to avoid any confusion by the resident.

	"At the point of escalation, we will need to understand what issues remain unresolved and specifically, what desired outcome you are looking for. As part of the escalation process, we will review all previous correspondence and actions, to ensure that nothing remains outstanding". On the landlords website, it makes no mention for Stage 2 about acknowledgments.	

5.0	Where a response to a complaint will fall	In its self-assessment the landlord references	The landlord should review its complaints
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	In its self-assessment the landlord references section 2.4.5 of its complaints policy, but no such section exists. Section 2.3.5 of the complaints policy, relating to Stage 1, states: "If a formal complaint or appeal cannot be resolved within the initial 10-day investigation	The landlord should review its complaints policy to ensure that the policy clarifies that the landlord will agree with the resident suitable intervals for being updated on their complaint, when the response falls outside of the extended timescales set out in the Code. The landlord should ensure that the complaints
		period, the customer will be contacted to update them on progress, explain what actions remain to be taken, and agree an extension of no more than 10 additional working days for those actions to be completed. Any further extensions will only be requested if there is a good reason."	procedure and its website also contain the same information, so as not to cause confusion to a resident.
		The landlords complaints procedure and website do not make any mention of extended timescales beyond the agreed 10 further working days after the initial 10 working days has elapsed.	

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6.2	Complaints must be acknowledged, defined	In its self-assessment the landlord references	The landlord should review its complaints
	and logged at stage 1 of the complaints	section 2.4.5 of its complaints policy, but no	policy to ensure it is clear that Stage 1
	procedure within five working days of the	such section exists.	complaints are acknowledged in writing,
	complaint being received.		defined and logged within 5 working days of
		Section 2.3.5 of the complaints policy, relating	the complaint being received. The landlord
		to Stage 1, states:	should ensure that this information is also
		"All complaints will be acknowledged within	reflected in its complaints policy and on its
		five working days and thereafter processed as	website to minimise confusion for its residents.
		quickly as reasonably possible, and within the	
		timescales stated in the	
		Complaints procedure."	
		On page 1 of the complaints procedure	
		document, relating to Stage 1, it states:	
		"We will acknowledge all complaints within 5	
		working days in a method of communication	
		that has been agreed with you."	
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		On the landlords website, for Stage 1, it states:	
		"Within five working days of your complaint	
		being raised, a Customer Complaints Advisor	
		will contact you to discuss your concerns and	
		explore the outcome and resolution you are	
		looking for. This will then be followed up by an	
		acknowledgement letter or email."	

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	In its self-assessment the landlord references section 2.4.5 of its complaints policy, but no such section exists.	The landlord should reviews its complaints policy to ensure it explains that it will issue a full response to a Stage 1 complaint within 10
		The complaints policy makes no reference to this section of the Code.	working days of the complaint being acknowledged.
		Page 1 of the complaints procedure, and the landlords website, states: "Upon completion of the investigation into the points raised we will confirm our response to you which will include all actions taken to resolve the complaint. If there are any subsequent actions to be taken we will give you clear timescales of when these will be completed and close your complaint at this point."	



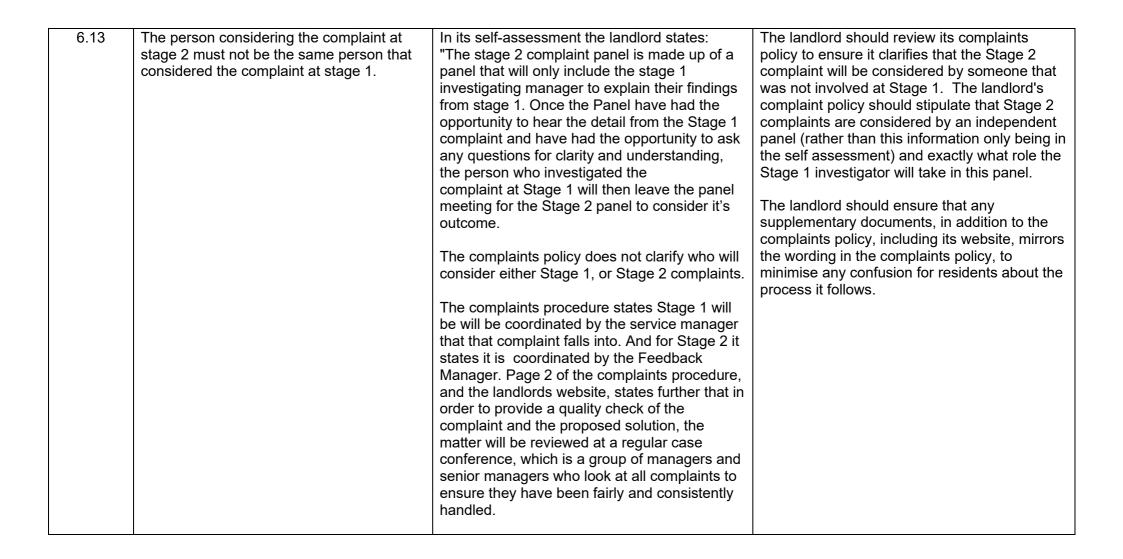
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	In its self-assessment the landlord states The Housing Ombudsman details and contact information is included in the template letter used for complaint extensions. The complaints policy does not contain any	The landlord should review its policy to ensure it clarifies that for both Stage 1 and Stage 2 the resident has the right to approach The Housing Ombudsman if the extension timescale that it stated in the Code is exceeded.
		reference for either Stage 1 or Stage 2 of to the residents right to approach The Housing Ombudsman if extension timescales exceed those stated in the Code.	The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.

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.	In its self-assessment the landlord has stated: "Repairs are tracked through the complaints case on our housing management system to enable us to keep track of actions promised at the point of closing the complaint with the customer." The complaints policy does not clarify if a complaint response is provided to the resident when the answer is known, rather than when all outstanding actions have been completed, But Section 2.3.5 of the complaints policy, relating to Stage 1 states: "If a formal complaint or appeal cannot be resolved within the initial 10-day investigation period, the customer will be contacted to update them on progress, explain what actions remain to be taken, and agree an extension of no more than 10 additional working days for those actions to be completed." Section 2.3.5 of the complaints policy states with regards to Stage 2: "If we are unable to resolve the stage 2 complaint within these timescales, the customer will be contacted to update them on progress, explain what actions remain to be taken, and agree an extension of no more than 20 additional working days for those actions to be completed."	The landlord should review its complaints policy to ensure it clearly explains that a complaint response will be provided to the resident when the answer is known, not when all outstanding actions are completed. This should be either specific to Stage 1 and Stage 2, or a statement covering both stages. The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.
		Page 2 of the complaints procedure, relating to Stage 1, and the landlords website, states: "Upon completion of the investigation into the points raised we will confirm our response to you which will include all actions taken to resolve the complaint. If there are any subsequent actions to be taken we will give you clear timescales of when these will be	

	completed and close your complaint at this point."	
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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	In its self-assessment the landlord states all additional complaints are added to the original complaint if these are linked to the main complaint. All unrelated matters which arise during the course of an investigation are handled as a separate complaint and the customer is advised of this.	The landlord should review its complaints policy to clarify that any related additional complaints, and not just comments made via correspondence sent to the landlords Senior Leadership Team or Board members, are incorporated into the Stage 1 response, if a response has not been issued.
	the response, the new issues must be logged as a new complaint.	Section 2.2.5 of the complaints policy states: "Correspondence sent to Alliance Homes Senior Leadership Team or Board members will be directed to the appropriate team for action. Where the contact relates to dissatisfaction, the issue will either be investigated as a new complaint or will be included as further information in a complaint that is already being investigated."	The complaints policy should include clarification that if any unrelated issues are raised, or if the issues raised would unreasonably delay a response, would also be logged as a new complaint.
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.	Section 2.3.5 of the complaints policy states: "If a customer remains unhappy after Stage 1 of the complaints process, they may ask us to escalate to a Stage 2, this should be requested within 10 working days." Page 2 of the complaints procedure states: "If you are not satisfied with the outcome at stage 1, or any agreed actions have not been completed satisfactorily, you have the right to request that your complaint is escalated to a stage 2." The landlords website states: "If you disagree with the decision please contact us within ten working days of receiving your stage 1 closure letter to ask for your complaint to be considered at stage 2." In its self-assessment the landlord states it makes clear in the Stage 2 outcome letter that this is the final response.	The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.

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.	Section 2.3.5 of the complaints policy states: "Any stage 2 complaints will be acknowledged, defined, and logged within 5 working days of an escalation request"	The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows. At present the website and complaints procedure do not mention this at all.
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.	The complaints policy does not clarify that a resident is not required to provide reasons for requesting their complaint to be escalated to Stage 2. The complaints procedure, on page 2, states: "At the point of escalation, we will need to understand what issues remain unresolved and specifically, what desired outcome you are looking for. As part of the escalation process, we will review all previous correspondence and actions, to ensure that nothing remains outstanding." In its self-assessment the landlord states: "All stage 2 escalations will be escalated at the request of the customer. Each customer who requests escalation has a telephone call with a member of the team to understand the reasons for escalation, what they are still unhappy and what the require in order to put the issue right."	The landlord should review its policy to clarify that a resident will not be required to provide reasons for requesting their complaint to be escalated to Stage 2. The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.



6.14	Landlords must issue a final response to	In its self-assessment the landlord references	The landlord should clarify in its policy that if it
	the stage 2 within 20 working days of the	section 2.4.5 of its complaints policy, but no	intends to give a resident the opportunity to
	complaint being acknowledged.	such section exists. The landlord confirms all	comment on any adverse findings before it
		residents receive a full written response to	issues its final response, that this will occur
		their complaint at Stage 2 of the process.	within the 20 working days timescale. It may also be helpful to clarify if the landlord will
		Section 2.3.5 of the complaints policy states:	further consider any resident comments made
		"A final response will be given after the stage 2	at this point, before it issues its response. The
		acknowledgement has been given and this will	landlord should ensure that a response is not
		be within a 20-day period."	unduly delayed as a result of this process.
		Page 2 of the complaints procedure, and the	The landlord has referenced a 20 day
		landlords website states:	timeframe to respond at Stage 2. If it wants a
		"We aim to respond within 20 working days,	shorter timeframe than the Code provides,
		but again, where there is added complexity, we	namely 20 calendar days as the policy
		will agree a suitable extension of the timescale	currently infers, this is fine, but if it means 20
		with you directly. Any extension would not	working days it should update this part of the

normally be more than a further 10 working

opportunity to comment on any adverse

findings before we determine our final

you."

days." Page 2 continues "You will be given the

response. We will then confirm our response to

As the complaints policy states it may extend the deadline for a response by 20 working days, and this conflicts with the 10 working days in the complaints procedure, the landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.

policy.

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.	In its self-assessment the landlord references section 2.4.5 of its complaints policy, but no such section exists. Section 2.3.5 of the complaints policy states: "If we are unable to resolve the stage 2 complaint within these timescales, the customer will be contacted to update them on progress, explain what actions remain to be taken, and agree an extension of no more than 20 additional working days for those actions to be completed. Any further extensions will only be requested if there is a good reason."	The landlord should review its complaints policy to ensure that it confirms the landlord will also explain to the resident the rationale for its decision to extend the timescale for Stage 2. The landlord should ensure that any supplementary documents, in addition to the complaints policy, including its website, mirrors the wording in the complaints policy, to minimise any confusion for residents about the process it follows.
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.	In its self-assessment the landlord states The Housing Ombudsman details and contact information is all included in the template letters used for confirming a complaint extension. The complaints policy does not contain any reference for either Stage 1 or Stage 2 of to the residents right to approach The Housing Ombudsman if extension timescales exceed those stated in the Code.	Recommendations for this section of the Code have been made in Section 6.5 of this assessment.

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.	In its self-assessment the landlord states that it resolves complaints at the point at which the answer is known, and the Complaints Team track outstanding issues through the complaints case on its housing management system. The complaints policy does not clarify if a complaint response is provided to the resident when the answer is known, rather than when all outstanding actions have been completed, but Section 2.3.5 of the complaints policy states with regards to Stage 2: "If we are unable to resolve the stage 2 complaint within these timescales, the customer will be contacted to update them on progress, explain what actions remain to be taken, and agree an extension of no more than 20 additional working days for those actions to be completed." Page 2 of the complaints procedure states: "We aim to respond within 20 working days, but again, where there is added complexity, we will agree a suitable extension of the timescale with you directly. Any extension would not normally be more than a further 10 working days. In order to provide a quality check of the complaint and the proposed solution, the matter will be reviewed at a regular case conference, which is a group of managers and senior managers who look at all complaints to ensure they have been fairly and consistently handled. You will be given the opportunity to comment on any adverse findings before we determine our final response. We will then confirm our response to you."	Recommendations for this section of the Code have been made in Section 6.6 of this assessment.

	"We aim to respond within 20 working days, but again, where there is added complexity, we will agree a suitable extension of the timescale with you directly. Any extension would not normally be more than a further 20 working days. In order to provide a quality check of the complaint and the proposed solution, the matter will be reviewed at a case conference, which is a group of managers and senior managers who look at all complaints to ensure they have been fairly and consistently handled."	
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