

Code provision	Code requirement	Comply: Yes / No	Evidence Commentary / explanation
<b>Section 1 – Definitions of a complaint</b>			
1.2	A complaint must be defined as: ‘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.’	Yes	We have adopted the Ombudsman’s definition and our policy statement reflects this.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Our policy reflects this, and this message is reinforced in our procedures and during staff training.
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	We recognise the difference between a service request and a complaint this is indicated on our complaints policy We provide training and guidance to all colleagues around the difference between a service request and a complaint. Service requests are recorded monitored and reviewed.
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	Yes	Services requests will always continue to be addressed even if the resident complains and this is reiterated in our staff training.

	their efforts to address the service request if the resident complains.		
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	Contact is currently made with the complainant and informed of our complaint policy and process. We aim to promote this further in our communications with tenants.

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Section 2 – Exclusions			
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	Our policy states that we would not unreasonably refuse to accept a complaint, if we do not accept the complaint the complainant would be written to giving the reasons why.
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	Yes	Our complaint policy states that we would not unreasonably refuse to accept a complaint. If a decision is made not to accept we will explain our reasons in writing our exclusions include:

	<p>and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>		<p>The issue giving rise to the complaint occurred over twelve months ago.</p> <p>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.</p> <p>Matters that have previously been considered under the complaints policy.</p>
2.3	<p>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.</p>	Yes	<p>We accept complaints within 12 months of the issue occurring but consider each complaint on its merits and where necessary would use our discretion to accept a complaint which is over 12 months if we thought it was the correct action to take.</p>
2.4	<p>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.</p>	Yes	<p>If a complaint is not accepted then the complainant would be written to explaining the reasons for the decision and offering the right to take their complaint to the housing ombudsman.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint</p>	Yes	<p>Each complaint is accessed individually we would not take a blanket approach to complaints</p>

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Section 3 – Accessibility and Awareness			
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	We have several routes through which a resident can raise a complaint, verbally either themselves or via a member of staff/ advocate in person or via telephone, email, letter. Our Complaints Policy contains a commitment to comply with the requirements of the Equality Act. We will tailor our complaints service by making the reasonable adjustments that are required ensure all our residents can access the complaints service.
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	We have several routes through which a resident can raise a complaint, verbally either themselves or via a member of staff/ advocate in person or via telephone, email, letter. Staff receive regular training on the process of managing resident complaints
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	We regularly review the volume of complaints that we receive at quarterly operation meetings, there is no target for the number of complaints we receive. We ensure that our residents are aware of how they can complain to us
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 landlords website.	Yes	Our 2 stage complaints policy and complaint procedure is available on our website and can be translated into different languages it is also available to download as a paper document. The policy and procedure indicate the timescales for responses.
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	Our policy indicates that we publicise details of the complaints policy, including information about the Ombudsman and this Code.

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	All residents have the opportunity to have a representative to deal with their complaint and can be represented and accompanied when meeting with Unity.
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	All of our communications explain the right to access the ombudsman service.

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Section 4- Complaint Handling and Staff			
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	At Unity we have Tenant Engagement Officer who has responsibility as our 'complaints officer', for ensuring that complaints are dealt with by the appropriate manager (complaint handler). The role is responsible for ensuring information about our complaints service is reported quarterly to our governing body.
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	The complaints officer has authority and autonomy to resolve complaints
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	Staff receive training on complaint management

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Section 5 – The Complaint Handling Process			
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 a single policy for dealing with complaints, residents are treated no differently if they complain.
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	Unity would always try to offer an early resolution to a complaint and consult with the complainant to find a solution.
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	We have a 2-stage process
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	There is only 1 process
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We ensure that any third party involvement with a complaint are also compliant with the code.
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	Yes	The complaint definition forms part of stage 1 and stage 2 responses.

	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.	Yes	Unity sets out clearly what the complaint is that they are responsible for investigating in all communications with complainants.
5.8	At each stage of the complaints process, complaint handlers must:  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	This forms part of colleague complaints training sessions.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	If a response falls out of the complaint handling code timescale we would agree with the complainant an suitable timescale
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	Our Complaints Policy contains a commitment to comply with the requirements of the Equality Act. We will tailor our complaints service by making the reasonable adjustments that are required ensure all our residents can access the complaints service.
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	Yes	We would not unreasonably refuse a complaint, unless there were valid reasons outlined in our complaints policy which are set out under the guidelines of the complaint handling code.

	set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		
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	We keep a full record of our complaints this includes 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.
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	This forms part of our complaints training.
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	Our policy is being updated to include this.
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	Our policy is being updated to include this.



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Section 6- Complaint Stages			
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	We will look to resolve complaints as early as possible and take into account the complexity of the complaint and the vulnerabilities of the resident. This forms part of complaints training and is included in our complaints handling toolkit.
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 is outlined in our policy and complaints handling toolkit.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	This is outlined in our policy and complaints handling toolkit.
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	This is included in our complaints handling toolkit and complaints training.
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	This is included in our standard complaint response templates our complaints handling toolkit and complaints training.
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	Yes	This is included in our complaints handling toolkit and complaints training and tracked on our complaints tracker.

	be tracked and actioned promptly with appropriate updates provided to the resident.		
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	This forms part of our complaints handling toolkit
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	This is included in our complaints policy
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	This is outlined in our complaints handling toolkit and included in complaints training.
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	This is outlined in both our complaints policy and complaints handling toolkit.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes	This is set out in our complaints policy and complaints handling toolkit.

	within five working days of the escalation request being received.		
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	This is included in our complaints handling toolkit and complaints training.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage 1 of our procedure is responded to by a Service Manager and Stage 2 by a Director. This is outlined in our policy and complaints handling toolkit.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	This is outlined in our complaints policy and complaints handling toolkit and also monitored by our complaints lead.
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 is outlined in our complaints policy and complaints handling toolkit and also monitored by our complaints lead.
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 is included in our letters confirming the extension to the timescales.
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	This is in our complaints policy
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	This is outlined in our complaints handling code and in our complaints training.

	decisions, referencing the relevant policy, law and good practice where appropriate.		
6.19	Landlords must confirm the following in writing 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 the Ombudsman Service if the individual remains dissatisfied.	Yes	This is outlined in our complaints policy and handling toolkit and included in complaints training.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is outlined in our complaints handling toolkit and included in complaints training.

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Section 7 – Putting Things Right			
7.1	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: <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> </ul>	Yes	This is in our complaints policy and complaints handling toolkit and training.

	<ul style="list-style-type: none"> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is outlined in our 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	This is included in our complaints handling kit
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Where necessary we consult Housing Ombudsman guidance to assist with deciding on the appropriate remedy.

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Section 8 Self-Assessment Reporting and Compliance			
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> </ul>	Yes	We provide an annual complaints report including all of these requirements to both our Operations Committee and Board. These are published on our website.

	<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 performance is reported to the Board and published on the website.
8.3	Landlords must also carry out a self assessment following a significant restructure, merger and/or change in procedures.	Yes	We commit to carrying out a self-assessment if a restructure, major or change in procedures happens.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation	Yes	We will comply with any requests made to review our self-assessment.
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 ensure that any reasons for not being able to comply with the code are shared with our residents and provide timescales for when this will be rectified.

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<b>Section 9- Scrutiny and Oversight: Continuous learning improvement</b>			
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	Themes are identified from lessons learnt being captured and wider service improvements are captured and shared with residents.
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	This is in our complaints policy and complaints handling toolkit and training.
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	Complaints performance is reported to resident scrutiny group, operations committee and board and will also form part of the work of our newly formed complaints panel including board members, Unity colleagues and chair of the residents scrutiny group.
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	We have a complaints officer and the Director of Housing Operations leads on the assessment of themes/ trends to ensure we prioritise these appropriately.
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	We have two (MRC) board members leading on complaints, ensuring that we have a positive complaints handling culture.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on	Yes	The MRCs will report back to board and will have access to all information to ensure they can perform this role effectively.

	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		
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 42</p> <p>d. annual complaints performance and service improvement report.</p>	Yes	The MRC and Board receive this information.
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 cooperative 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	This statement is reflected in our policy.