

Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	1.1 Ongo Homes Complaints and Feedback policy	Tenant Feedback; Agreed is present in the Policy and agree we are compliant with the code but concerned that it could be Misinterpreted would like extra clarity in the procedure when reviewed
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	1.4 Ongo homes Complaint and Feedback Policy 2.2 Ongo Homes and Feedback Policy	Tenant Feedback; Would like further clarity in the procedure to ask residents if they wish to make a complaint to support customer choice. Landlord Commentary We always work with resident advocates and third party agencies making complaints on behalf of the tenant to ensure we support tenants to complain and will always handle these in line with the code.
1.4	Landlords must recognise the difference between a service request	Yes	3.1 Ongo Homes policy and Feedback Policy	Tenant Feedback;

	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.			<p>Clarification in the procedure on this is required and would like to ensure staff do not react on assumption and gain clarity of complaint or service request</p> <p>Landlord Commentary The policy sets out we will not categorise service requests as a complaint and a definition of a service request.</p>
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	3.1 Ongo Homes Complaints and Feedback Policy and Procedure.	<p>Landlord Commentary; This is written with the policy and in practice we would have an ongoing service request and a complaint logged at the same time.</p>
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about	Yes	<p>Qualtrics Closing page on surveys Dissatisfaction tickets generated</p>	<p>Landlord Commentary; On each closing page of the survey we have a statement that lets customers know if they are not happy, they can complain and it links them to our complaint page on the website with all the</p>

	their services, they also must provide details of how residents can complain.			<p>information and form to make a complaint.</p> <p>We also generate workflows (tickets) on dissatisfaction scores. This then goes to appropriate team leader with the relevant service areas to look at the issue, contact the tenant and work to resolve any issues. Complaint would be logged at this point if the customer chose to do so.</p>
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 3 Ongo Homes Complaints and Feedback Policy	Landlord Commentary; We will consider each complaint individually and will only refuse a complaint where it is reasonable and in line with the code. We operate if we are in doubt approach, we will log the complaint.
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: <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 	Yes	Section 3 Ongo Homes Complaints and Feedback Policy	Landlord commentary The reasons where we won't accept a complaint are set out within section 3 of our policy and are in line with the code.

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy. 			
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	3.3 Ongo Homes Complaint and Feedback Policy	<p>Landlord Commentary This is set out in the complaint policy and considers where exceptions should be made</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	3.8 Ongo Homes Complaint Policy	<p>Landlord Commentary We will always put in writing to a complainant why we would not accept a complaint</p> <p>We have a letter template to ensure we detail all of the required information.</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>1.6 Ongo Homes Complaint Policy</p> <p>4.1 Ongo Homes Complaint Policy</p>	<p>Landlord Commentary We always log and define a complaint separately and do not take a blanket approach to excluding complaints or accepting complaints</p>

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	1.3 Ongo Homes policy Ongo homes Website sets out all the methods on how to make a complaint. https://www.ongo.co.uk/contact-us/complaints/	Landlord Commentary; We accept complaints through all methods of communication and in any format. We have a reasonable adjustment policy that would support this approach and support people to make a complaint where it is required.
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	New Starter Induction Presentation Agenda Item Service Standards and Complaints	Landlord Commentary Every colleague coming into work at Ongo across all service has an overview of complaint the definition, our complaint process and their responsibilities within complaints Further Improvements planned; New E Learning Package and videos

				<p>Core brief articles regularly, Contractor SLAs and evidenced training</p>
3.3	<p>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.</p>	Yes	<p>Complaint demand reports Complaint demographic reports</p>	<p>Tenant Feedback Would like to see a report and monitoring repeat complainants to ensure we are managing expectations, utilising the unacceptable behaviour policy effectively and providing support where necessary</p> <p>Landlord Commentary We regularly monitor the numbers of complaints and where our complaints are coming from in regards to demographics of our tenant base.</p> <p>Further improvements to add this detail into future annual Complaints Performance and Service Improvement report</p>

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.	Yes	Section 4 Ongo Homes Policy Ongo Homes Website	<p>Tenant feedback Would like to use the Mystery shopper tenant inspector process to ensure there is complete accessibility to the complaint's services</p> <p>The complaint stage is outlined within the policy and each stage.</p> <p>We have set out the steps in clear one sentence statements.</p>
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	6.1 Ongo HomeComplaint Policy 6.6 Ongo Homes Complaint Policy	<p>The statement within the policy explains how we will publish the policy and the code information.</p> <p>We will also share in the policy what information we will publicise and where that will be.</p>
3.6	Landlords must give residents the opportunity to have a representative	Yes	4.3 Ongo Homes Complaint Policy	This is clear in our policy and Ongo would always

	deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		Reasonable Adjustment Policy	support somebody having a representative in any service provision.
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	4.10 Ongo Homes Complaint Policy Ongo Homes Website	<p>In this section of the policy we are really clear about how the Housing Ombudsman can assist a complainant and there are full details of how to access the Housing Ombudsman</p> <p>We have a full section on the website on our complaints page about the Housing Ombudsman and their right to access.</p> <p>We also have the make it right campaign Logo and QR code which also explains a tenants rights to access the Housing Ombudsman.</p> <p>We also put this on every complaint letter in all stages and will attach the Ombudsman leaflets for customers also.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>Complaints Officer - Becky Johns, Customer Experience Manager</p> <p>We have a team of 3 Complaint handlers which make up our Customer Resolution Team.</p> <p>The Director of Customer Services oversees the Complaint Officer and links into the Ongo Homes Board and Executive Leadership Team.</p>	<p>The Complaints Officer oversees the Customer Resolution Team and liaises with the Housing Ombudsman. Provides the performance reports including the annual complaint and Service improvement report.</p> <p>The complaint Officer also has direct access to the MRC on the governing Board</p>
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	<p>Customer Resolution Job Descriptions</p> <p>Customer Experience Manager Job Description</p>	<p>The team have access to all teams and levels of the organisation. They are empowered to investigate the complaint independently and make the decisions independently based on their findings. If this decision is challenged by a team or service lead again they are empowered to continue to make the right</p>

				<p>independent decision for the tenant.</p> <p>This is a supported approach from our Leadership Team</p>
4.3	<p>Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p>	Yes	<p>Housing Ombudsman centre for learning records</p> <p>Skills matrix for complaint handlers</p> <p>Team Meeting Minutes</p> <p>Training sessions</p>	<p>The Complaint handlers have an objective to ensure their complaint handling s prioritised in line with the complaint handling code.</p> <p>They encouraged and instructed to complete training provided by the Housing Ombudsman.</p> <p>We have an internal skills matrix that logs the skills that are required and their competencies against this.</p> <p>The complaint Officer (Customer Experience Manager) Provides training sessions when required but especially when we have lessons learnt exercises.</p>

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	1.5 Ongo Homes Complaint Policy Customer Focus Strategy	This is a single policy that covers all aspect Ongo Homes Complaints Culturally we would in still this as an approach that all residents have a right to complain and that we should consider this in a positive manner and an opportunity to learn.
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	Section 4 Ongo Homes complaint policy	This section sets out that we have a two stage process only. The policy recognises a service request but sets out customer choice to complain

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	Section 4 Ongo Homes Policy	We have made it clear that an informal stage is no longer accepted and it's a two stage process only.
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	Contractor SLA Letter briefing contractors of our complaint and regulatory responsibilities	<p style="color: green;">Tenant Feedback It is important that tenants are able to complain to their landlord even when a contractor is dealing with the work this</p> <p>We have informed all contractors that they must channel all of the complaints through to our Customer Resolution team so our complaint process can be followed.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Contractor Service Level Agreement Letter Briefing contractors on the new code	We have asked contractors to ensure we are made aware of any complaint made by our tenants
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	Yes	Customer Resolution Code Training on 19 th March 2024 Ongo Homes Complaints Procedure	The procedure sets out the requirement to clarify the complaint definition with the Customer.

	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	Customer Resolution Code Training on 19th March Ongo Homes Complaints Procedure	We acknowledge all complaints and will ensure complaint definitions are clarified.
5.8	At each stage of the complaints process, complaint handlers must: <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	Customer Resolution Code Training on 19th March Ongo Homes Complaints Procedure Housing Ombudsman Centre of Learning dispute resolution training.	<p style="color: green;">Tenant Feedback</p> <p style="color: green;">Add something into the procedure to change the handler when there is a conflict of interest or where there is a clash and it is appropriate to change the Officer to foster good tenant landlord relations.</p> <p>We would consider each situation on its own individual circumstance and complaint handlers are fully aware of this approach.</p>
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	Yes	Ongo Homes Complaint Policy	We would take every reasonable effort to ensure complaints are handled within the code timescales. We would always

	keeping them informed about their complaint.			communicate any delays in response and agree with the complainant
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	Client alerts and Client Data Customer consent and Profiling Procedure Reasonable adjustment policy	<p>Tenant Feedback Would like to see further communication across all service areas in particular reasonable adjustments and tenant vulnerabilities</p> <p>The record disabilities and vulnerabilities through our client alerts on our CRM reporting on these will keep them under active review. We are currently reviewing the responsibilities and frequency.</p> <p>The reasonable adjustments policy is there to support staff to consider and deliver reasonable adjustments</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they	Yes	Ongo Homes Complaint Policy Ongo Homes Complaint Procedure	We always escalate a complaint unless it is outside of the policy however discretion is always used if it is reasonable.

	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	Ongo Homes Complaints Procedure Complain Chronology Reports	<p style="color: green;">Tenant Feedback The tenant complaint panel will run dedicated sessions on auditing the complaint handling and records kept ensuring this is happening in practice</p> <p>This is what we do in practice it is explained in the policy and we have reports that we use to check this is happening in practice.</p>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Ongo Homes Complaints Policy Procedure	<p>Complaint handlers do not have to escalate to a stage 2 to leverage a resolution or higher levels of compensation the decision can be made at any level of a service or complaint process.</p> <p>Complaint handlers have access to discuss cases at all levels to ensure they can provide the best response and resolution at any stage.</p>
5.14	Landlords must have policies and procedures in place for managing	Yes	Unacceptable behaviour Policy	We follow the guidance from the housing Ombudsman

	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.			when applying the unacceptable behaviour policy. The policy and process is governed by the complaints Officer (Customer Experience Manager) to ensure consistency and reasonableness when activated this procedure
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	Unacceptable behaviour Policy Reasonable adjustments.	<p>As part of this process vulnerabilities and reasonable adjustments are considered and recorded on every occasion.</p> <p>Unacceptable behaviour restrictions are kept in active review by the Customer Experience Manager.</p> <p>To improve this further a new dedicated report could be created to ensure that it is visible and can be accessed in the absence of the Customer Experience Manager.</p>

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Customer Resolution Code Training on 19th March Complaint Procedure	We have built the triage process into the acknowledgement procedure to enable prompt resolutions We encourage all staff to have a resolution approach at first contact and to recognise service requests or early intervention.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Ongo Homes Complaints Policy and Procedure	We acknowledge complaints and confirm this is writing. The timescales are observed
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Ongo Homes Complaint Policy and procedure Complaint in target Report Complaint quarterly performance Board reports	We always endeavour to hit the 10 working day response times We can monitor this through our reports

				<p>We share this information with our customer complaint panel and Board.</p> <p>We publish this data to our customers on our website</p>
6.4	<p>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.</p>	Yes	<p>Customer Resolution Code Training on 19th March</p> <p>Ongo Homes Complaint Policy and Procedure</p>	<p>We facilitate a triage approach at the acknowledgement stage and ensure we are considering complexity at the earliest opportunity. We only extend up to 10 days</p>
6.5	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	Yes	<p>Ongo Homes Complaint Procedure</p>	<p>We add the Housing Ombudsman contact details to our extension letters</p>
6.6	<p>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.</p>	Yes	<p>Ongo Homes Complaint Policy and Procedure</p> <p>Follow on report</p>	<p>Tenant Feedback; Would like the procedure wording strengthened for procedural Follow ups on complaints ensuring the practical process highlights to all departments their responsibilities in this</p> <p>We are very clear on this approach and it is happening within practice.</p>

				<p>We operate a follow-on process to keep track of issues.</p> <p>We have improved the follow-on process to ensure the responsibility sits with the service area actioning the work</p>
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	Ongo Homes Complaint Procedure	We are doing this in Practice and using the housing ombudsman template response letter to support this
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p>Ongo Homes Procedure Document</p> <p>Housing Ombudsman Case learning</p>	<p>This is happening in practice after we learnt from a Housing Ombudsman Case.</p> <p>The complaint handlers are clear on this approach.</p>
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; 	Yes	<p>Ongo Homes Complaint Procedure</p> <p>Example complaint response letters</p>	<p>This happens on all response letters.</p> <p>It is clearly defined in the procedure.</p>

	<p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Ongo Homes Complaint Policy and Procedure	Yes, we take this approach on every case where it is required. The complaint handlers are fully aware of this expectation however we have followed on processes in place to mitigate the need for this requirement and that resolutions are carried out.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Ongo Homes Complaint Policy	We operate an acknowledgement procedure on both stages.
6.12	Residents must not be required to explain their reasons for requesting a	Yes	Customer Resolution Code Training on 19th March	We have changed our practice on this in line with

	stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		Ongo Home complaint Procedure	the new code and added this into the procedure
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Ongo Homes Complaint Policy	We always escalate a stage 2 to an independent appropriate level leader.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Ongo Home Policy and Procedure	This happens in practice
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	Customer Resolution Code Training on 19th March Ongo Homes Complaint Policy and Procedure	We facilitate a triage approach at the acknowledgement stage and ensure we are considering complexity at the earliest opportunity. We only extend up to 20 days
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	Ongo Home Complaint Procedure	We provide contact details of the Housing Ombudsman on all extension letters
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	Yes	Ongo Home Complaint Policy and Procedure	We operate a follow-on process to track live resolutions to Stage 2 complaints we would not delay a response, but we will endeavour to ensure the resolutions have been

	actioned promptly with appropriate updates provided to the resident.			carried out wherever possible
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	Ongo Homes Complaint Policy and Procedure	We are very clear on this approach, and it is happening within practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> 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	Ongo Homes Complaint Procedure	<p>This happens on all response letters.</p> <p>It is clearly defined in the procedure.</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Ongo Homes Procedure	<p>Stage 2 responses are usually handled at a head of service level which is an appropriate level, However, we are building in a review procedure at</p>

				director level to ensure that their second level review at the highest level
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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	Ongo Homes Complaint Policy and Procedure	<p>We are open to all resolutions available and ensure we considering all aspects of a complaint to provide the right resolution</p> <p>We are using learning from recent determinations to understand this further and keep evolving our approaches</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Ongo Home Complaint Procedure	We have ensured we are visiting complainants to understand the full extent of their dissatisfaction, the

			Ongo Home Compensation Procedures	<p>level of disruption and the impact it is having on the tenant.</p> <p>We are currently reviewing our compensation Policy to reflect the Housing Ombudsman Remedy guidance</p>
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	Ongo Homes Complaint Procedure Follow up report	We do set this out in our response letters, and we have a follow-on process to ensure resolutions are completed
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Ongo Homes Complaint procedures	<p>The complaint handlers are fully aware of the remedy's guidance by the housing Ombudsman.</p> <p>We have used determinations to learn on how to evolve our approaches</p> <p>Our compensation Policy is currently under review</p>

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Complaint Performance and Service Improvement Board Report</p> <p>Ongo Home Complaint Policy</p>	<p>On May 15th 2024 the first complaint performance and service report will be reviewed at Ongo Homes Board</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	Complaint Performance and Service improvement Board Report	<p>We have always reported complaint performance to Board</p> <p>We will continue to report to board in the new format and in agreement with the MRC</p> <p>We will publish the report on our complaint website page with the board response</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaint data from the recent acquisition of properties form the Guinness partnership	<p>We will of ensure this happens if Ongo proceed with any mergers</p> <p>We have recent acquired 842 properties within the transition of the properties and the tenants we ensured any complaint data was shared and any ongoing complaints</p>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We would always comply with instruction from the Housing Ombudsman
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and	Yes		This has not happened, but we are aware when we need to do this.

	publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			We would follow our business continuity processes
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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	Strategic repairs action group and action Plan Housing Ombudsman determination Learning Plans	We have several areas of work ongoing that has been driven from complaints where a systemic internal review has taken place and high-level focus on service improvements.
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	2023/2024 Complaint Learning Summary Coporate Plan Customer Focus Strategy	We are committed to continuous improvement we are open about where we need to improve services and the Strategic Repairs Action Group is a inter departmental collaborative approach to learning and implementing service improvements
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	Customer complaint panel Quarterly Complaint performance on our website Sharing of Housing Ombudsman Orders on our website	We ensure all of our complaint performance and learning findings are scrutinised by our customer complaint Panel and then shared with Community Voice our decision-making tenant panel.

			Key New Articles	We also publish all the performance on complaint handling on our website and share our housing Ombudsman determinations and significant learning on our complaint findings
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	Customer Experience Manager (Complaint Officer) Overseen by Director of Customer Services	The complaint Officer is responsible for the governance on complaint handling the associated performance. The complaint officer is accountable to the director of Customer Services to ensure complaint handling is managed appropriately and escalates any risks where required. The Learning is logged and recorded, themes are escalated and is responsible for all policy and procedure reviews where required.
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	Yes	Member Responsible for Complaints Rachael Cook - Board member Senior Independent Director	We have appointed an MRc in line with the code requirements.

	is referred to as the Member Responsible for Complaints ('the MRC').			
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	Customer Service update reports to Board Pre-Meetings with the MRC are conducted	We are still developing the communication pathways as the MRC is new. We have pre meetings with the MRC before every Board Meeting There is direct communication between the complaint Officer and the MRC when required.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: 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	Customer Service Update reports for Board	The MRc will have an update on complaint before every board meeting. Any specific findings form the Housing Ombudsman Sharing of Spotlight reports Complaint performance and Service Improvement Board Report pre discussions before the Board Meeting

9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>Corporate Plan</p> <p>Customer Focus Strategy</p> <p>New starter Induction Presentation</p>	<p>We have written measures into our corporate plan to ensure everyone understand the importance of complaint handling.</p> <p>Our Customer Focus strategy has a standard objective in relation to complaints</p> <p>We deliver this to all of our staff in their first corporate induction to ensure this is embedded as an approach</p> <p>We add in the objectives to our complaint handling team and will consider reviewing Job description in the future</p>
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