

Langley House Trust Housing

Ombudsman Complaints Performance and service improvement report

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1.0 Introduction

The Housing Ombudsman's Complaint Handling Code became statutory on April 1, 2024, requiring social housing landlords to adhere to its mandates by law.

Under the Social Housing (Regulation) Act 2023, the Ombudsman is legally obligated to monitor social housing landlords' compliance with the Code. Consequently, Langley Trust, as a social housing landlord, must produce an annual complaints performance and service improvement report that includes:

- a) An annual self-assessment against the Code to ensure the complaint handling policy remains in line with the Ombudsman's requirements.
- b) A qualitative and quantitative analysis of the social housing landlord's complaint handling performance. This analysis must also summarize the types of complaints Langley Trust has refused to accept.
- c) Any findings of non-compliance with the Code by the Ombudsman. d) The service improvements made as a result of learning from complaints.
- e) Any other relevant reports or publications produced by the Ombudsman regarding the work of Langley Trust.

The annual complaints performance and service improvement report must be presented to Langley Trust's governing body (or equivalent) and published on the section of its website dedicated to complaints.

The governing body's response to the report must also be published alongside it. This year's self-assessment must be submitted to the Ombudsman by June 30, 2024

2.0 Complaint Handling Analysis:

Overview

Complaint Handling Analysis: April 1, 2023 - March 31, 2024

Overview

Between April 1, 2023, and March 31, 2024, Langley Trust received a total of 58 complaints. These complaints were handled as follows:

- **Stage 1:** 53 complaints were resolved at the initial stage.
- **Stage 2:** 5 complaints were escalated for further investigation.

Modes of Complaint Receipt

Complaints were received through various channels:

- **Emails:** 22 complaints
- **Verbal:** 20 complaints
- **Written:** 11 complaints

Categories of Complaints

Complaints were categorized based on the nature of the issue:

- **Service Delivery:** 9 complaints
- **Staff Attitude:** 6 complaints
- **Management Attitude:** 2 complaints
- **Communication:** 1 complaint
- **Transport Issues:** 1 complaint
- **Other Issues (uncategorized by services on ACC):** over 36 complaints

Key Points

- Langley Trust addressed all complaints, with none being refused by the Trust.
- A significant portion over (62%) of complaints fell under the "Other Issues" category, indicating potential gaps in the categorization system.

Analysis and Recommendations

1. High Volume of "Other Issues" Complaints:

- **Analysis:** The majority of complaints (36 out of 58) were not categorized under specific service-related issues. This has indicated that the current categorization process is insufficient, and some recurring issues do not fit into existing categories.

- **Recommendation:** Review and potentially revise the categorization framework to better capture the nature of complaints. Implement a more detailed sub-categorization system to understand and address common themes within "Other Issues."

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2. Mode of Complaint Submission:

- **Analysis:** The distribution of complaints through emails, verbal, and written forms suggests a use of different communication channels. However, verbal complaints represent a significant proportion, which might be harder to document and track.
- **Recommendation:** Continue enhance the tracking process for verbal complaints to ensure they are as well-documented by staff and adequately followed this can be enhance during complaint audit to ensure that every information is adequately captured.

3. Escalation to Stage 2:

- **Analysis:** Only 5 out of 58 complaints were escalated to Stage 2, which could indicate that most issues are resolved satisfactorily at the first stage. However, it is also possible that some issues are not being recognized as needing further escalation. Or there may need for increased awareness amongst clients on the opportunities for escalation.
- **Recommendation:** Regularly review Stage 1 complaint resolutions to ensure that issues are thoroughly addressed and that escalation criteria are clear to both staff and client such that it is consistently applied.

4. Service Delivery and Staff Attitude Complaints:

- **Analysis:** Complaints about service delivery and staff attitude make up a notable proportion of the total. These areas directly impact customer satisfaction and trust.
- **Recommendation:** Conduct targeted best practice programs within services to help staff to improve service delivery and address attitude issues.
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5. Management Attitude and Communication:

- **Analysis:** Although fewer in number, complaints about management attitude and communication can have significant implications for organizational culture and employee morale.
- **Recommendation:** Foster a culture of open communication and responsive management with mechanisms where employees and clients can voice concerns about management practices confidentially.

By addressing these areas, Langley Trust can improve its complaint handling process, enhance service quality, and increase overall customer satisfaction. Regular analysis of complaints and proactive measures to address identified issues will contribute to continuous improvement.

- **Compliant Process Action Plan and timeframe:** refer to section 5 for the time frame and the designated team for implementing the complaint handling process action plan.

3.0 Tenant Satisfaction Report (Landlord Assessment)

	Requested Information	Result	Department
RP01	What percentage of homes within the Langley Trust did not meet the Decent Homes Standard in the last 12 months (financial year)?	0%	Property Team
RP02	What is the target timescale for repairs set by the Langley Trust?	Emergency – 24 Hours attendance Urgent 7 days attendance Routine – 28 days attendance	Property Team
	What percentage of repairs, including both emergency and non-emergency requests from clients, were completed within the target timescale set by the Langley Trust in the last 12 months (financial year)? (Repairs planned by Langley Trust should be excluded.)	Data is not accurate, but the figures are showing at 100% for all 3 areas. This is being reviewed and a better reporting process is coming into force in the 2024/25 Financial period to capture better repairs reporting.	Property Team

BS01	What percentage of homes within the Langley Trust had all necessary gas safety checks completed in the last 12 months (financial year)?	100%	Property Team
BS02	What percentage of homes in buildings within the Langley Trust had all necessary fire risk assessments completed in the last 12 months (financial year)?	100 %	Property Team
BS03	What percentage of homes in buildings within the Langley Trust had all necessary asbestos management surveys or re-inspections completed in the last 12 months (financial year)?	100%	Property Team
BS04	What percentage of homes within the Langley Trust had all necessary legionella risk assessments completed in the last 12 months (financial year)?	100%	Property Team

BS05	What percentage of homes in buildings within the Langley Trust had all necessary safety checks for communal passenger lifts completed in the last 12 months (financial year)?	100%	Property Team
CH01	How many complaints were received by the Langley Trust in the last 12 months (financial year)?	58	Quality Team
CH02	What percentage of complaints were responded to within the Complaint Handling Code Timescales by the Langley Trust in the last 12 months (financial year)?	100%	Quality Team
NM01	How many instances of antisocial behaviour occurred within the Langley Trust in the last 12 months (financial year)?	625	Quality Team

4.0 Tenant Satisfaction Measure Survey

In the recently completed TSM survey, 72 clients participated, providing valuable insights into their experiences:

(TP01)-51% of respondents felt very satisfied with the service provided by Langley Trust, 30% felt fairly satisfied, 11% felt neither satisfied nor dissatisfied, 3% felt fairly dissatisfied, and 4% very dissatisfied.

(TP02)-30% of respondents felt very satisfied with the overall repair service from Langley Trust over the last 12 months, 30% felt fairly satisfied, 12% felt neither satisfied nor dissatisfied, 1% felt fairly dissatisfied, and 3% very dissatisfied.

(TP03)-23% of respondents felt very satisfied with the time taken to complete their most recent repair after it was reported, 27% felt fairly satisfied, 12% felt neither satisfied nor dissatisfied, 5% felt fairly dissatisfied, and 7% very dissatisfied.

(TP04)-27% of respondents felt very satisfied that Langley Trust provides a home that is well-maintained, 26% felt fairly satisfied, 19% felt neither satisfied nor dissatisfied, 7% felt fairly dissatisfied, and 7% very dissatisfied.

(TP05)-47% of respondents felt very satisfied that the condition of the property or building they live in was safe, 25% felt fairly satisfied, 15% felt neither satisfied nor dissatisfied, 1% felt fairly dissatisfied, and 4% very dissatisfied.

(TP06)-33% of respondents felt very satisfied that Langley Trust listens to their views and acts on them, 32% felt fairly satisfied, 10% felt neither satisfied nor dissatisfied, 1% felt fairly dissatisfied, and 7% very dissatisfied.

(TP07)-41% of respondents felt very satisfied that Langley Trust keeps them informed about things that matter to them, 27% felt fairly satisfied, 15% felt neither satisfied nor dissatisfied, 1% felt fairly dissatisfied, and 7% very dissatisfied.

(TP08)-47% of respondents strongly agreed that Langley Trust treats them fairly and with respect, 19% agreed, 14% neither agreed nor disagreed, 0% disagreed, and 3% strongly disagreed.

(TP09)-22% of respondents felt very satisfied with Langley Trust's approach to complaint handling in the last 12 months, 11% felt fairly satisfied, 11% felt neither satisfied nor dissatisfied, 0% felt fairly dissatisfied, 3% very dissatisfied, and 36% have not made a complaint in the last 12 months.

(TP010)- 32% of respondents felt very satisfied with condition of the communal area, 18% felt fairly satisfied, 16% felt neither satisfied nor dissatisfied, 3% felt fairly dissatisfied, and 0% very dissatisfied.

(TP011)-36% of respondents felt very satisfied that Langley Trust makes a positive contribution to their neighbourhood, 22% felt fairly satisfied, 21% felt neither satisfied nor dissatisfied, 0% felt fairly dissatisfied, and 7% very dissatisfied.

(TP012)-41% of respondents felt very satisfied with Langley Trust's approach to handling anti-social behaviour, 23% felt fairly satisfied, 15% felt neither satisfied nor dissatisfied, 4% felt fairly dissatisfied, and 3% very dissatisfied.

(Langley Trust Questionnaire) 40% of respondents felt very satisfied that Langley Trust is helping them to address their offending behaviour, 26% felt fairly satisfied, 19% felt neither satisfied nor dissatisfied, 0% felt fairly dissatisfied, and 5% very dissatisfied.

5.0 Lesson learnt from complaints to drive improvement

1. **Learning and Cascading Practices:**

- **Analysis:** Many services have not been able to evidence how learnings from complaints were obtained and integrated into practice. There were numerous cases where services had to be repeatedly chased before complaints were closed.
- **Recommendation:** Ensuring a robust documentation and sharing learnings from complaints. Ensure that all services can demonstrate how they have applied these learnings to improve practices. Introduce regular training sessions focused on complaint handling, emphasizing the importance of timely and accurate resolution.

By addressing these areas, Langley Trust can improve its complaint handling process, enhance service quality, and increase overall customer satisfaction. Regular analysis of complaints and proactive measures to address identified issues will contribute to continuous improvement.

Actions	Delegated Team	Target date
To identify a suitable training program for every staff on complaint handling.	Quality Team	30 September 2024
To deliver adequate training to every staff handling compliant	Learning and Development Team	March 2025
To retrain staff on how to adequate use ACC to capture and manage complaints	Quality Team	30 September 2024

including adequate complaint categorisation		
To organise a Best Practice Session on Positive Complaint Handling Culture	Quality Team	30 November 2024
To ensure that the process for reporting percentage of repairs, including both emergency and non-emergency requests from clients give a correct and adequate data by reviewing the process	Property Team	31 March 2025
Regularly review Stage 1 complaint resolutions to ensure that issues are thoroughly addressed and that escalation criteria are clear and consistently applied	Quality Team	30 September 2024
Enhance the tracking system for verbal complaints to ensure they are as well-documented by staff and adequately followed	Operations Team	30 September 2024
Foster a culture of open communication and responsive management with	Quality and Operations Teams	30 September 2024

mechanisms where employees and clients can voice concerns about management practices confidentially		
Review and potentially revise the categorization framework to better capture the nature of complaints. Implement a more detailed sub-categorization system to understand and address common themes within "Other Issues."	Quality Team	30 September 2024
Ensuring a more intensive senior management review of every complaint to ensure lesson is learnt and cascade into practice	Quality Team	30 June 2024

6.0 Self-Assessment Report

Non-Compliance Issues Identified

Following a self-assessment review of the Langley Trust complaint procedure and practice against the complaint handling code; a couple of non-compliance issues with the code were identified:

2. Definition of Service Request:

- **Issue:** The complaint policy did not explicitly define what a service request is or distinguish it from a complaint.
- **Action:** Update the complaint policy to clearly define and differentiate a service request from a complaint.

3. Complaint Acceptance Timeframe:

- **Issue:** The policy indicated that complaints would not be accepted if referred outside 6 months of the issue occurring, contrary to code requirements.
- **Action:** Amend the policy to align with code requirements regarding the timeframe for accepting complaints.

4. Complaint Process Stages:

- **Issue:** The Trust has a three-stage complaint process, including an informal stage, instead of the two-stage process instructed by the code.
- **Action:** Revise the complaint process to conform to the two-stage process specified by the code.

5. Interim Responses and Extensions:

- **Issue:** The Trust provided interim responses informing complainants of actions in progress or being considered, rather than ensuring that any extension at Stage 1 is not more than 10 working days without a good reason, as required by the code. Similarly, the extension at Stage 2 should not be more than 20 working days without a good reason.

- **Action:** Ensure compliance with the code by limiting extensions at Stage 1 to no more than 10 working days and at Stage 2 to no more than 20 working days, unless there is a good reason.
- **Self-assessment Detailed Action Plan and timeframe:** refer to section 7 for a detailed description of each action, the time frame and the designated team for implementing the actions from the Self-assessment report.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	Langley Trust's Complaint, complement and suggestions procedure.	Langley Trust implemented Ombudsman definition of a complaint in February 2022. It is also written into Langley Trust's policy.

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	Langley Trust's Complaint, complement and suggestions procedure.	Langley Trust complaints procedures and practice do not expect the clients to use the word "complaint" in order for a client concern or dissatisfaction to be raised as a complaint
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	No	The complaint procedure correctly defines what a complaint is but does not clearly distinguish a service request from a complaint. However, in practice, Langley Trust ensures that service requests are well managed, recorded, and actioned through a separate policy and process. For example, typical housing repair requests are always logged, managed, monitored, and actioned on Fix-Flu.	This has now been rectified in the revised Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024. Note: The proposed change in the procedure now specifically defines a service request, distinguishes it from a complaint, and details how it is managed.

	recorded, monitored and reviewed regularly.			
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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	An example of this is when some clients at Ashdene were not satisfied with how their request for a repair was handled, specifically the timeframe of repairs, the client representative was supported to raise this as a complaint in December 2023 following their discussion at the clients meeting.	
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	We do carry out a yearly survey; however, any expression of dissatisfaction with services made through a survey is not recorded on ACC as a complaint but is always dealt with through a robust action plan process. Clients are always encouraged to raise a complaint whenever they are not satisfied, regardless of taking part in the survey. When a client intends to raise a complaint after expressing their dissatisfaction in a survey, the service manager will normally support the client to do so.	

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	Langley Trust rarely refuse to accept a complaint, except if the issue occurred outside the required timeframe from when the issue occurred, or for client-on-client complaints that are now managed through our incident management system. However, in 12 months, Langley Trust has not refused any complaints on the grounds of the timeframe, as the service managers in most cases use their discretion to proceed due to the vulnerability of the clients. Even if a complaint is to be decline on any valid ground, Langley Trust would still seek to obtain lessons	

			where applicable and support the client. We also accept client-on-client complaints if they pertain to how Langley Trust is managing anti-social behaviour.	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	No	<p>Langley Trust complaints procedure does suggest circumstances in which a matter may not be considered as a complaint or escalated; however, Langley Trust policy indicated that any complaint will not be accepted if referred outside 6 months of the issue occurring. This has now been reviewed to comply with the complaint handling code that allows for matters to be referred within 12 months of the issue occurring.</p> <p>Note: in the past 12 months, Langley Trust has not had to decline.</p>	<p>The timeframe for not accepting a complaint has now been amended in line with the Code in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.</p>

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	• Matters that have previously been considered under the complaints policy.			
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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.	No	<p>Langley Trust procedure indicated that any complaint will not be accepted if referred outside 6 months of the incident occurring. This has now been reviewed to comply with the complaint handling code that allows for matters to be referred within 12 months of the issue occurring or been known to the client.</p> <p>Note: in the past 12 months, Langley Trust has not had to decline.</p>	The timeframe for not accepting a complaint has now been amended in line with the Code in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Langley Trust's Complaint, complement and suggestions procedure.	Langley Trust rarely refuses to accept a complaint, except for client-on-client complaints, which are now managed through our incident management system with adequate explanations given to the clients. If a client strongly believes it should be recorded as a complaint, our service managers typically raise it as a complaint to ensure thorough reporting.

				<p>Clients are always supported to escalate their concerns to the ombudsman service if they disagree with Langley Trust's decision at any point.</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>Analysis of the records of complaints log on ACC suggest that in practice every complaint is treated uniquely.</p>	<p>Langley Trust does not apply a blanket approach to excluding complaints, as every complaint is examined uniquely, even if the initial narration is not substantial enough or the service is unable to clarify further, in many cases, Langley Trust will record such issue as a complaint when the initial information is not clear enough to establish its status, rather than excluding it. This approach allows for a senior management review.</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	Langley Trust has an easy read version of the complaint procedure and a very simplified video that explains to clients how to raise complaint	
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	ACC complaints log records.	The clients are able to raise complaints in a way that suits them. This can verbal, email, written and etc.
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	The Quarter 4 2023-2024 Quality and Operations Report.	Langley Trust has always encouraged its services to work with clients and their representatives to ensure they are aware of the complaint process and how to raise complaints. Recently, when the number of complaints dropped, the area

				managers worked with their services to further ensure that clients are increasingly aware and able to use the process. This led to an increase in the number of complaints recorded in the Quarter 4 (23/24) to 18 from subsequent 8 in Quarter 3(23/24).
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.	No	Langley Trust has a three-stage complaint process, including an informal stage. However, the procedure did provide details of timeframes, what will happen at each stage and was published on Langley Trust's website.	This has now been aligned with the two-stage directive from the complaint handling code, and the informal stage has been removed in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.

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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	Langley Trust Policy and Procedure include information about the Ombudsman and how to escalate complaints to the Ombudsman.	
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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	Langley Trust holds regular client meetings which include National Consultative Group (NCG) meetings, which is co-chaired by a client. Every service is represented by a client who acts as their representative. There are opportunities available for client's rep to express any concerns on behalf their service and the can escalated to a formal complaint if they which to do so.	
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	Langley Trust Policy and Procedure include information about the Ombudsman, and how to escalate complaints to the Ombudsman with the relevant support available.	

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	Langley Trust Quality Team has been assigned the responsibilities of the Complaint Officer.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Quality Team has autonomy and access to staff and clients at all levels to facilitate the prompt resolution of 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 (Partially)	Langley Trust has embraced complaint handling as a tool to drive improvement by identifying lessons. Staff has been trained on how to log complaints via the ACC (Complaint Management System). However, recent review of process indicates the need for	The Quality and Learning & Development are working together to identify a suitable training program as well as ensuring everyone is competently trained to handle complaint.

			many staff to be specially trained on how to categorize and handle complaint effectively to a closure.	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Langley Trust has a single policy in place for dealing with complaints covered by this Code, and Langley Trust's clients are never treated 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.	No	Langley Trust previously has an informal stage in its complaint procedure, which has now been removed in the revised policy.	Langley Trust has a three-stage complaint process, including an informal stage. However, following a policy review, this is now aligned with the two-stage directive from the complaint handling code, and the informal stage has been removed. The new

				changes will be effective from June 2024 once the Complaints, Compliments, and Suggestions Procedure, becomes approval by the board.
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.	No	Langley Trust has a three-stage complaint process, including an informal stage. However, following a policy review, this is now aligned with the two-stage directive from the complaint handling code, and the informal stage has been removed.	
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	Yes	Any contractor or third party acting on behalf of Langley Trust is expected to adhere to the two-stage complaints process set out in this Code. Clients are not required to go through multiple complaints processes	
	expected to go through two complaints processes.			

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	If applicable, Langley Trust will always ensure that any third parties handle complaints in line 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 seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	When a complaint is logged at Stage 1 or escalated to Stage 2, Langley Trust always ensures that the complaint is adequately defined and the outcomes the client is seeking are clearly identified.	
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	When a complaint is acknowledged at either stage, Langley Trust always ensures clarity on the scope it covers and will clarify any areas where this is not clear.	
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 	Yes	At each stage of the complaints process, Langley Trust deals with complaints on their merits, acts independently and with an open mind, and gives the client a fair chance to present their position, addressing any actual or perceived conflicts of interest as	

	actual or perceived conflict of interest; and		it considers all the available evidence.	
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	d. consider all relevant information and evidence carefully.			
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	Langley Trust will always inform the complainant if a response falls outside the timeframe, advising them of the extended timeline.	

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.			
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Langley Trust does not refuse to escalate complaints; instead, it advises and supports the client if they wish to proceed	
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	Yes	The ACC complaint management system stores the full record of every complaint.	
	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	Langley Trust always seeks to offer a remedy to every complaint as soon as possible, even while the process is ongoing.	
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	Langley Trust has an effective incident management process in place for monitoring and managing anti-social behaviour.	
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	Langley Trust does not restrict clients on its own accord; any restrictions in place mostly come from the probation service, often as a condition of the licenses	

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	Langley Trust operated an informal stage which aimed to sort out minor problems as quickly as possible. It involves a specific discussion between clients and staff. Clients may wish to bring someone to explain their problem or complaint. However, following a review of the policy, this has now been changed to a stage 1 formal staged	
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	Langley Trust ensures that every complaint is acknowledged, defined and logged at stage 1 within five working days of the complaint being received.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Langley Trust ensures that every complaint is issued a response to within Ten working days of the complaint being received.	
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	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being	

	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.		considered. This has now been amended in the revised policy to ensure that any extension at stage 1 is not more than 10 working days without a good reason, as required by the complaint handling code.	
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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. Langley Trust would only refer the client the Ombudsman at the end of the stage 3 which has now converted to a 2-stage process. This has been amended in the revised policy to ensure that the complainant is also provided with the contact details of the Ombudsman for any extension not having to wait until completion of the internal process.	

6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Langley Trust would normally provide a complaint response when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. In the revised procedure, any outstanding actions are expected to be tracked and monitored on ACC.	
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	Langley Trust ensures all points raised in a complaint are addressed, providing adequate reasons for each decision.	
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	Langley Trust will normally treat additional complaints together with existing ones for related ongoing issues otherwise it will enter as a new complaint.	

6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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 stage 2 if the individual is not satisfied with the response. 	Yes	Langley Trust has a template guide for writing to its clients for every complaint that meets all the requirements stated.	
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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	Langley Trust encourages clients to escalate their dissatisfaction to stage 2 if all or part of the complaint is not resolved to the resident's satisfaction at stage 1.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure	Yes	The complainants will receive a written acknowledgement from the Service Manager within 5	

			working days using the template in Appendix 1.	
	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	Langley Trust does not question a client or their intentions to escalate a complaint.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The person considering the complaint within Langley Trust when escalated is always different to the person that considered the complaint at the previous stage.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	At stage 2 (Formally stage 3)The review is always by an independent peer to the original complaint investigator or escalated to someone at a more senior level. A formal response will follow within 20 days of the review being acknowledged.	

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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. This has now been amended in the revised policy to ensure that any extension at stage 2 is not more than 20 working days, as required by the complaint handling code.	
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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. This has now been amended in the revised policy to ensure that the complainant is also provided with the contact details of the Ombudsman for any extension.	
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	Langley Trust would normally provide a complaint response when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. In the revised procedure, any outstanding actions are expected	

			to be tracked and monitored on ACC.	
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	Langley Trust ensures all points raised in a complaint are addressed, providing adequate reasons for each decision.	
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	Langley Trust has a template guide for writing to its clients for every complaint that meets all the requirements stated.	

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	In most cases, a more senior member of staff or a suitable staff member will review and issue the final response to the clients.	
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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	A complaint is only considered closed when the complainant has been written to, outlining what has been done to resolve the complaint, actions to rectify the complaint have been agreed upon, and the client has indicated that they are satisfied with the outcome.	

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	No	This has now been added to the revised policy of Langley Trust.	
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	A complaint is only considered closed when the complainant has been written to, outlining what has been done to resolve the complaint, actions to rectify the complaint have been agreed upon, and the client has indicated that they are satisfied with the outcome.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Yes, Langley Trust takes into account the guidance issued by the Ombudsman when deciding on appropriate remedies.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the 	Yes	Langley Trust produces an annual complaints performance and service improvement report	

	Ombudsman in relation to the work of the landlord.			
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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	Langley Trust produces annual complaints performance and service improvement report is reported to the board and published on Langley Trust website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	Langley Trust has not had any mergers since the revised complaint handling code came into effect.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	No request has been sent to Langley Trust by the Ombudsman	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	N/A	N/A	

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	Langley Trust's Complaint, complement and suggestions procedure.	Langley Trust has embraced complaint handling as a tool to drive improvement by identifying lessons beyond the individual complaint.
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	Minutes of best practice forum	Langley Trust encourages its services to use complaints as a tool to identify possible gaps and adopt a positive attitude with an open mind to address these gaps, aiming to improve the quality of the experience for its clients.
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	The Quarterly Quality and Operations Committee report	Langley Trust Quality and Operations Committee reviews every complaint quarterly to identify trends, patterns, and lessons, using this information to strategically address the root causes of common issues.

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	The Head of Quality and Compliance has been designated as accountable for their complaint handling.	
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	The Director of Quality and Compliance has been designated as the Member Responsible for Complaints.	
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	The MRC is responsible for ensuring the governing body receives regular information on complaints that provides insight on Langley Trust's complaint handling performance	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and 	Yes	The is reported to the MRC and board a on quarterly basis in the Quality and Operations committee report.	
	d. annual complaints performance and service improvement report.	Yes	Langley Trust annual complaints performance and service improvement report does meet the stated requirement with actions in place to address non-compliance.	

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 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. 			
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7.0 Self-Assessment Non-Compliance Action Plan

Code provision	Code requirement	Compliance	Action	Delegated Team	Deadline
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	No	This has now been rectified in the revised Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024. Note: The proposed change in the procedure now specifically defines a service request, distinguishes it from a complaint, and details how it is managed.	Quality Team and the board	June 2024

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. <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>	No	<p>Langley Trust policy indicated that any complaint will not be accepted if referred outside 6 months of the issue occurring. The timeframe for not accepting a complaint has now been amended in line with the Code in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.</p>	Quality Team and the board	June 2024
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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.	No	The Langley Trust's policy indicated that any complaint will not be accepted if referred outside 6 months of the issue occurring. The timeframe for not accepting a complaint has now been amended in line with the Code in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.	Quality Team and the board	June 2024
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.	No	Langley Trust has a three-stage complaint process, including an informal stage. However, the procedure did provide details of timeframes, what will happen at each stage and was published on Langley Trust's website. This has now been aligned with the two-stage directive from the complaint handling code, and the informal stage has been	Quality Team and the board	June 2024

			removed in the Complaints, Compliments, and Suggestions Procedure, which will come into effect following board approval in June 2024.		
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 (Partially)	Langley Trust has embraced complaint handling as a tool to drive improvement by identifying lessons. Staff has been trained on how to log complaints via the ACC (Complaint Management System). However, recent review of process indicates the need for many staff to be specially trained on how to categorize and handle complaint effectively to a closure. The Quality and Learning & Development are working together to identify a suitable training program as well as ensuring everyone is	Quality Team in collaboration with the Learning and Development Team	March 2025

			competently trained to handle complaint.		
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.	No	Langley Trust previously has an informal stage in its complaint procedure, which has now been removed in the revised policy.	Quality Team and the board	June 2024
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.	No	Langley Trust has a three-stage complaint process, including an informal stage. However, following a policy review, this is now aligned with the two-stage directive from the complaint handling code, and the informal stage has been removed.	Quality Team and the board	June 2024
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	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. This has now been amended in the revised policy to ensure that any	Quality Team and the board	June 2024

	be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		extension at stage 1 is not more than 10 working days without a good reason, as required by the complaint handling code.		
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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. Langley Trust would only refer the client the Ombudsman at the end of the stage 3 which has now converted to a 2-stage process. This has been amended in the revised policy to ensure that the complainant is also provided with the contact details of the Ombudsman for any extension not having to wait until completion of the internal process.	Quality Team and the board	June 2024

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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. This has now been amended in the revised policy to ensure that any extension at stage 2 is not more than 20 working days, as required by the complaint handling code.	Quality Team and the board	June 2024
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.	No	Langley Trust would normally provide an interim response informing complainants of actions in progress or being considered. This has now been amended in the revised policy to ensure that the complainant is also provided with the contact details of the Ombudsman for any extension.	Quality Team and the board	June 2024

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	No	This has now been added to the revised policy of Langley Trust.	Quality Team and the board	June 2024
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