

## 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  |
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| 1.2            | A complaint must be defined as:<br><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              | <a href="#">Complaints - Thrive Homes</a> | Our Complaints Policy clearly defines a complaint as following:<br><br>A complaint is 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 group of residents. |
| 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              | <a href="#">Complaints - Thrive Homes</a> | As above. Our complaints policy also states, ‘A complaint submitted by an appointed third-party representative will still be dealt with in line with Thrive’s complaint policy and procedure.’  |
| 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  | Yes              | <a href="#">Complaints - Thrive Homes</a> | A service request is made by a customer to Thrive requiring action to be taken to put something right.  |

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|     | 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>Service requests are not complaints. Service requests are recorded, monitored, and reviewed regularly. Customers will be given clear timescales for when the request will be resolved.</p> <p>If a customer is unhappy with a response to a service request, even if our attempts to resolve the request are still ongoing, we will raise the matter as a complaint. During this time, we will continue our efforts to resolve the service request as quickly as possible.</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 | <a href="#">Complaints - Thrive Homes</a> | <p>If a customer is unhappy with a response to a service request, even if our attempts to resolve the request are still ongoing, we will raise the matter as a complaint. During this time, we will continue our efforts to resolve the service request as quickly as possible.</p>   |

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| 1.6 | <p>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.</p> | Yes | <p><a href="#">Complaints - Thrive Homes</a></p> | <p>There may be occasions when customers are invited to take part in surveys to give feedback about our services. Whilst we wouldn't define dissatisfied responses to a survey as a complaint, customers are informed of how they can raise a complaint.</p> |

## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence                                  | Commentary / explanation  |
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| 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              | <a href="#">Complaints - Thrive Homes</a> | <p>We will always look to resolve complaints customers raise with us, but on some occasions we can't. Before any decision is made, we assess each case on its own merits and, if we're unable to accept your complaint, we'll write to you and explain why. Customers have the right to take this decision to the Ombudsman who may not agree that the exclusion has been fairly applied.</p> <p><b>Please see policy doc for full table of exclusions.</b></p> |
| 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   | Yes              | <a href="#">Complaints - Thrive Homes</a> | Please see policy doc for full table of exclusions.   |

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|     | <p>residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul> |     |   |  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>Where the issue took place over 12 months ago, and we've had no contact on the matter since then, we would not be able to investigate the complaint.</p> <p>However, if the issue took place over 12 months ago, and there's reasonable evidence to suggest that the customer only recently became aware of the issue, we would still consider taking this through the complaint process.</p> |
| 2.4 | <p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the</p>  | Yes |   | <p>Before any decision is made, we assess each case on its own merits and, if</p>  |

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|     | 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. |     |   | we're unable to accept your complaint, we'll write to you and explain why. This letter will also provide details on how to refer this decision to the Housing Ombudsman if you do not agree with it. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.  | Yes | <a href="#">Complaints - Thrive Homes</a> | Before any decision is made, we assess each case on its own merits and, if we're unable to accept your complaint, we'll write to you and explain why.  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence                                  | Commentary / explanation  |
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| 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              | <a href="#">Complaints - Thrive Homes</a> | <p>Under the Equality Act 2010 we will always make appropriate reasonable adjustments for our customers when handling their complaint. We will keep a record of any disabilities disclosed by customers. The agreed adjustments will be kept under regular review.</p> <p>Our complaints process aims to be fair and is open to all and you can read more about our approach to inclusivity in our Equality, Diversity &amp; Inclusion Statement of Intent which can be found here: <a href="#">Equality, Diversity and Inclusion Statement of Intent - Thrive Homes</a>.</p> |
| 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   | Yes              | <a href="#">Complaints - Thrive Homes</a> | All Thrive colleagues receive regular training on identifying and resolving complaints. This training is provided at least  |

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|     | be able to pass details of the complaint to the appropriate person within the landlord.  |     |   | annually or whenever there is a change in process. It is also embedded into the onboarding journey for all new starters as part of their induction to Thrive.  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | Complaint volumes and associated trends and insights are reported to Board quarterly. These are further shared through Listening & Learning workshops with colleagues where feedback can be used to drive service improvements.  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>We aim for our complaint policy to be clear and in an accessible format to all residents. If there's anything that you're unsure of within our policy, customers can request a hard copy which can be sent in an email or by post.</p> <p>We have a two-stage complaint process. We will look to resolve things at stage 1. If this isn't possible, the complaint will be escalated stage 2.</p> <p>The policy is published on the website which has accessibility tools.</p> |

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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 | <a href="#">Complaints - Thrive Homes</a> | So that our policy is visible for all customers, it's published on our website and can be sent out to customers directly via email or in the post. Links to our policy are also available in our newsletters and in our emails. Customers are also reminded of where to find the policy details in all communications about their complaint and when giving feedback in surveys. All communication about our complaint policy includes information about the Housing Ombudsman and its code. This information can be found within our policy in the 'Taking the complaint to the Housing Ombudsman' section. |
| 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 | <a href="#">Complaints - Thrive Homes</a> | A customer can appoint a third party to act as their representative for their complaint by completing a consent form <a href="#">Third Party Customer Consent - Thrive Homes</a> which will be sent to <a href="mailto:complaints@thrivehomes.org.uk">complaints@thrivehomes.org.uk</a> .  |

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| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>If at any point during the complaint process, you're unhappy with how the complaint is being handled please let us know by contacting the complaints team on 0800 917 6077 or by emailing <a href="mailto:complaints@thrivehomes.org.uk">complaints@thrivehomes.org.uk</a></p> <p>Customers can also contact the Housing Ombudsman at any time for guidance, information and support.</p> <p><b>See policy doc for full wording</b></p> |
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## Section 4: Complaint Handling Staff

| Code provision | Code requirement   | Comply: Yes / No | Evidence                                  | Commentary / explanation   |
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| 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              | <a href="#">Complaints - Thrive Homes</a> | <p>We have a team that is trained to handle complaints in accordance with the Thrive Policy and the Housing Ombudsman complaint handling code. The team work closely with all areas of the business at all levels to resolve complaints as quickly as possible.</p> <p>The Director - Customer is responsible for ensuring that the organisation meets the Complaint Handling Code.</p> <p>The case handler who investigates the stage 2 complaint will not be the same person that handled the stage 1 complaint.</p> |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints.  | Yes              | <a href="#">Complaints - Thrive Homes</a> | The complaints team work closely with all areas of the   |

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|     | They must also have the authority and autonomy to act to resolve disputes promptly and fairly.  |     |   | business at all levels to resolve complaints as quickly as possible.   |
| 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 | <a href="#">Complaints - Thrive Homes</a> | All Thrive colleagues receive regular training on identifying and resolving complaints. This training is provided at least annually or whenever there is a change in process. It is also embedded into the onboarding journey for all new starters as part of their induction to Thrive. |

### Section 5: The Complaint Handling Process

| Code provision | Code requirement   | Comply: Yes / No | Evidence                                  | Commentary / explanation   |
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| 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              | <a href="#">Complaints - Thrive Homes</a> | This policy sets out Thrive Homes approach to complaint handling following the Housing Ombudsman complaint handling code. Customers can easily access it and Thrive colleagues can identify and handle complaints effectively. |

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| 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 | <a href="#">Complaints - Thrive Homes</a> | We always look to resolve complaints as quickly as possible. Where we can identify a resolution without the need for a full stage 1 investigation, we will confirm this with the customer and agree what action we are taking to put things right, how we've learnt from their complaint and their referral rights. An early resolution will not prevent or delay a customer's right to escalate the complaint to stage 2 if they choose to. |
| 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 | <a href="#">Complaints - Thrive Homes</a> | We have a two-stage complaint process. We will look to resolve things at stage 1. If this isn't possible, the complaint will be escalated stage 2.   |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | N/A |   | We do not have a third party for handling complaints. These are handled in house, by Thrive Homes.   |

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| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | N/A |   | We do not have a third party for handling complaints. These are handled in house, by Thrive Homes.  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | We will acknowledge stage 1 and stage 2 complaints within five working days from receipt. The acknowledgment will confirm what aspects of the complaint we are responsible for and clarify areas that we are not or that are unclear of. We will then share this with customer and explain what we plan to do to investigate and resolve the complaint. |
| 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 | <a href="#">Complaints - Thrive Homes</a> | The acknowledgment will confirm what aspects of the complaint we are responsible for and clarify areas that we are not or that are unclear and share with customer what we plan to do to investigate and resolve the complaint.   |
| 5.8 | At each stage of the complaints process, complaint handlers must:  | Yes | <a href="#">Complaints - Thrive Homes</a> | At each stage of the complaint process, we will:  |

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|     | <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> |     |   | <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>                    |
| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>Where an extension is required, this will be for no longer than 10 working days for a stage 1 complaint and 20 working days for a stage 2 of the original response date. All extensions will be confirmed to customers in writing and include:</p> <ul style="list-style-type: none"> <li>• the reason for the extension</li> <li>• contact details for the Housing Ombudsman</li> </ul> |

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|      |  |     |  | <ul style="list-style-type: none"> <li>when they can expect further updates from us.</li> </ul>  |
| 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 | <a href="#">Equality, Diversity and Inclusion - Thrive Homes</a> | Under the Equality Act 2010 we will always make appropriate reasonable adjustments for our customers when handling their complaint. We will keep a record of any reasonable adjustments that have been agreed, as well as any disabilities disclosed by customers. The agreed adjustments will be kept under regular 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 | <a href="#">Complaints - Thrive Homes</a>                        | We will always look to resolve stage 1 and stage 2 complaints, but on some occasions we can't. Before any decision is made, we assess each case on its own merits and, if we're unable to accept your complaint, we'll write to you and explain why. Customers have the right to take this decision to the Housing Ombudsman who may not agree that the exclusion has been fairly applied. |

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| 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 | <a href="#">Privacy Policy - Thrive Homes</a> | We will keep a full record of the complaint and the outcomes reached at each stage. The record will include the original complaint and the date it was received, all correspondence with the resident and other relevant third parties, and any relevant supporting documents such as reports and 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 | <a href="#">Complaints - Thrive Homes</a>     | From the moment our customers tell us they are unhappy, we will look to identify and use a variety of appropriate remedial action.<br><br>Any action that we agree to take in order to put things right will be tracked and actioned promptly. We'll provide the customer with regular updates until all actions are completed. On their completion, we'll contact the customer to confirm what action has been taken and resolve any outstanding queries. |

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| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>Our <a href="#">Equality, Diversity and Inclusion Statement of Intent</a> sets out our expectations of how we want colleagues to treat each other and our customers. The root of this statement is that we will not make assumptions, judgments or decisions based on the way others look, sound or based on someone's beliefs or the way they chose to live their lives. We understand at times that, when things go wrong, it can be distressing, and people can act out of character in times of trouble. Distress and upset can lead to a customer approaching us to get matters resolved.</p> <p>However, we have a duty to protect our colleagues, and will not tolerate unacceptable behaviour or excessive demands on our service that impact the safety of Thrive employees, or that prevents them from</p> |
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|      |  |     |   | <p>carrying out their duties effectively.</p> <p>It is these behaviours which we aim to manage under our Staff Protection Policy and The Thrive Deal.</p> |
| 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 | <a href="#">Our Relationship - Thrive Homes</a> | As above  |

## 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              | <a href="#">Complaints - Thrive Homes</a> | Where we can identify a resolution without the need for a full stage 1 investigation, we will confirm this with the customer and agree what action we are taking to put things right, how we've learnt from their complaint and their referral rights. An early resolution will not prevent or delay a customer's right to escalate the complaint to stage 2 if they so choose. |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>  | Yes              | <a href="#">Complaints - Thrive Homes</a> | Our Complaints Policy states that we will acknowledge stage 1 and stage 2 complaints within five working days from receipt.   |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working</u></b>  | Yes              | <a href="#">Complaints - Thrive Homes</a> | As per our Complaints Policy, customers can expect to receive a   |

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|     | <b>days</b> of the complaint being acknowledged.  |     |   | response within 10 working days from acknowledgement for a stage 1 complaint and within 20 working days for a stage 2.   |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | <a href="#">Complaints - Thrive Homes</a> | Where an extension is required, this will be for no longer than 10 working days for a stage 1 complaint and no longer than 20 working days for a stage 2 of the original response date.  |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes | <a href="#">Complaints - Thrive Homes</a> | Thrive will seek to agree this with the customer and confirm the new deadline. All extensions will be confirmed to customers in writing and include: <ul style="list-style-type: none"> <li>• the reason for the extension</li> <li>• contact details for the Housing Ombudsman</li> <li>• when they can expect further updates from us</li> </ul> |

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| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>In our response, we will include the following:</p> <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) what the complaint is about;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) any learning from the complaint</li> <li>f) details of any outstanding actions</li> </ul> <p>Outstanding actions are kept on a tracker which is reviewed daily to ensure that they are completed within the timescales agreed with customers. Customer updates are recorded on the tracker and in the customer record system.</p> |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,   | Yes | <a href="#">Complaints - Thrive Homes</a> | We will address all points raised in the complaint and provide clear reasons for our decisions with reference  |

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|     | referencing the relevant policy, law and good practice where appropriate.   |     |   | to the relevant laws, policies and good practice.  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | Where the customer raises additional complaint points during the stage 1 investigation, that are related to the existing issue, these will be added into the open complaint. If the new points raised are unrelated to the complaint being investigated, or would unreasonably delay the response, they will be logged as a new complaint.                                   |
| 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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes |   | In our response, we will include the following: <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) what the complaint is about;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) any learning from the complaint</li> </ul> |

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|  |  |  |  | f) details of any outstanding actions |
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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              | <a href="#">Complaints - Thrive Homes</a> | We will look to resolve the complaint at stage 1. If this isn't possible, the complaint will be escalated stage 2.   |
| 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              | <a href="#">Complaints - Thrive Homes</a> | Customers can expect to receive a response within 10 working days from acknowledgement for a stage 1 complaint and within 20 working days for a stage 2.   |
| 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              | <a href="#">Complaints - Thrive Homes</a> | Customers are not required to explain their reasons for requesting an escalation to stage 2. However, if we receive a request to escalate and any aspect of the complaint is unclear, we will contact the customers to seek clarification. |

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| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | <a href="#">Complaints - Thrive Homes</a> | The case handler who investigates the stage 2 complaint will not be the same person that handled the stage 1 complaint.   |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes | <a href="#">Complaints - Thrive Homes</a> | Customer can expect to receive a response within 10 working days from acknowledgement for a stage 1 complaint and within 20 working days for a stage 2.   |
| 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 | <a href="#">Complaints - Thrive Homes</a> | Where an extension is required, this will be for no longer than 10 working days for a stage 1 complaint and 20 working days for a stage 2 of the original response date.  |
| 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 | <a href="#">Complaints - Thrive Homes</a> | Thrive will seek to agree this with the customer and confirm the new deadline. All extensions will be confirmed to customers in writing and include: <ul style="list-style-type: none"> <li>the reason for the extension</li> </ul> |

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|      |   |     |  | <ul style="list-style-type: none"> <li>• contact details for the Housing Ombudsman</li> <li>• when they can expect further updates from us</li> </ul>  |
| 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 |  | <p>In our response, we will include the following:</p> <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) what the complaint is about;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) any learning from the complaint and details of any outstanding actions</li> </ul> |
| 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 |  | We will address all points raised in the complaint and provide clear reasons for our decisions with reference to the relevant laws, policies and good practice.  |

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| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> | Yes |  | <p>In our response, we will include the following:</p> <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) what the complaint is about;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) any learning from the complaint and details of any outstanding actions</li> </ul> <p>For stage 1 complaints we will also include details of how to escalate the matter to stage 2 if the customer is not satisfied with the response. For stage 2 complaints we will also include details of how to escalate the matter to the Housing Ombudsman if the customer remains dissatisfied.</p> |
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| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes |  | The complaints team works closely with all areas of the business at all levels to resolve complaints as quickly as possible. |
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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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes              | Complaints - Thrive Homes | <p>Action we may take includes:</p> <p>Apologising;</p> <p>Acknowledging where things have gone wrong;</p> <p>Providing an explanation, assistance or reasons;</p> <p>Taking action if there has been delay;</p> <p>Reconsidering or changing a decision;</p> <p>Amending a record or adding a correction or addendum;</p> <p>Providing a financial remedy in line with our compensation policy which can be found here:</p> <p>Schedule of Compensation - Thrive Homes and</p> <p>Statement of Compensation - Thrive Homes</p> |

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|     |   |     |   | Changing policies, procedures or practices  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes | <a href="#">Complaints - Thrive Homes</a> | Any remedy that we offer will reflect the impact on the customer as a result of the service failure that was identified.  |
| 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 href="#">Complaints - Thrive Homes</a> | Any action that we agree to take in order to put things right will be tracked and actioned promptly. We'll provide the customer with regular updates until all actions are completed. On their completion, we'll contact the customer to confirm what action has been taken and resolve any outstanding queries |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes |   | When deciding on what remedial action to take, we will use the Housing Ombudsman's guidance which can be found here: <a href="#">Guidance on remedies (housing-ombudsman.org.uk)</a>  |

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|  |  |  |  | We will also refer to the Housing Ombudsman's Compensation Guidance here: <a href="#">Compensation guidance</a> |
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## 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p><a href="#">Our Performance - Thrive Homes</a></p> | <p>We will provide an annual report about our complaint handling performance and service improvements. This will include:</p> <ul style="list-style-type: none"> <li>a) the annual self-assessment against this Code to ensure our complaint handling policy remains in line with its requirements.</li> <li>b) a qualitative and quantitative analysis of our complaint handling performance. This must also include a summary of the types of complaints we have refused to accept;</li> <li>c) any findings of non-compliance with the Code by the Ombudsman;</li> <li>d) the service improvements made as a result of the learning from complaints;</li> </ul> |

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|     |   |     |  | <p>e) any annual report about our performance from the Ombudsman; and</p> <p>f) any other relevant reports or publications produced by the Ombudsman in relation to the work.</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 |  | <p>These reports will be shared with our governing body and published on our website at <b><a href="http://thrivehomes.org.uk/complaints">thrivehomes.org.uk/complaints</a></b>. Our governing body will provide a response to the report which will be published alongside it</p> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes |  | <p>Thrive will carry out a self-assessment against the Housing Ombudsman code at least once a year, following any restructuring, merger, change in procedure, or following a Housing Ombudsman investigation, and publish the results on our website.</p>                          |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes |  | As above   |

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| 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<br>Landlords must provide a timescale for returning to compliance with the Code. | Yes |  | Where we have found non-compliance with the code, we'll provide an explanation for this and confirm what action is being taken to ensure future compliance. |
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## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence                                  | Commentary / explanation  |
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| 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              | <a href="#">Complaints - Thrive Homes</a> | Thrive will use all complaints as a way for us to learn about how we can improve our service to prevent similar complaints occurring in the future. This includes Thrive looking beyond the circumstances of individual complaints and considering whether service improvements can be made as a result of any learning from the 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              | <a href="#">Complaints - Thrive Homes</a> | <p>We value the voice of our customers and commit to delivering a great service. Sometimes, things can go wrong, and it's important that our customers are able to let us know so that we can put things right.</p> <p>Thrive will use insights from complaints as a way for us to learn about how we can</p>                               |

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|     |  |     |   | improve our service to prevent similar complaints occurring in the future.   |
| 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 | <a href="#">Complaints - Thrive Homes</a> | <p>Each quarter, analysis will be carried out to identify themes and trends on the learning from complaints. The analysis will then be shared with the wider business who will agree on specific actions to improve the customer experience.</p> <p>Key learnings will be shared with stakeholders, colleagues and relevant committees. We will also share with customers on the Thrive website.</p> |
| 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 Customer Insight & Experience oversees Thrive's complaint handling performance. They assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.   |

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| 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 | <a href="#">Our Board and Executive - Thrive Homes</a> | The Chair of the Customer Colleague and Governance Committee (CCG) has lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (The Member).               |
| 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 CCG Chair ensures the governing body receives regular information on complaints and provides insight on the Thrive's complaint handling performance. He has access to suitable information and staff to perform this role and report on their findings. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;   | Yes |  | The CCG receives at each meeting:<br><br>a) regular updates on the volume, categories and outcomes of complaints,   |

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|     | <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> |     |  | <p>alongside complaint handling performance;</p> <p>b) regular reviews of issues and trends arising from complaint handling;</p> <p>c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings;</p> <p>and annually:</p> <p>d) the annual complaints performance and service improvement report.</p> |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  | Yes |  | Thrive has a standard objective in relation to complaint handling for all relevant employees or third  |

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|  | <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> |  |  | <p>parties that reflects the need to:</p> <ul style="list-style-type: none"><li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li><li>• take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li><li>• act within the professional standards for engaging with complaints as set by any relevant professional body.</li></ul> |
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