

## HOS ANNUAL SELF ASSESSMENT 2024

### HOS guidance: 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.

Throughout this document, unless otherwise stated, “we, our, ours and us” refers to Triathlon Homes or Southern Housing’s Complaint Resolution team appointed to manage residents' complaints for Triathlon Homes’.

### 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><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 Policy 2.1</a>  | We have adopted the Housing Ombudsman’s definition of a Complaint and a service request in our Complaints Policy (Section 2).   |
| 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 | Yes              | <a href="#">Complaints Policy 2.4, 3.2</a><br><br><a href="#">Putting it right Leaflet</a> | Our Complaints policy (section 2.4 and 3.2) and ‘putting it right’ leaflet details how we’ll deal with a residents expression of dissatisfaction. Any enquiry fitting the definition of a complaint will be raised and handled as such. We accept complaints via third parties. |

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|     | with the landlord's complaints policy.   |     |   |   |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | <a href="#">Complaints Policy 2.4</a><br><br><a href="#">Website link</a> | This is set out in section 2.4 of our Complaints Policy. We also detail this on our website. Detailed processes outline how colleagues (staff) will use Appendix B of the HOS Complaint Handling Code 2024 as guidance for identifying service requests and complaints. We record and monitor service requests on our technology systems. |
| 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 Policy 2.4</a>                                     | Our Complaints Policy details how we'll escalate a service request to a complaint.  |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the  | Yes | <a href="#">Complaints Policy</a>   | Our Survey Team are trained to make residents aware that they can make a complaint.<br><br>Any online surveys we conduct with residents explain how their feedback will be used and provides a link to our Complaints website pages   |

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|  | <p>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> |  |  | <p>for further information on how they can make a complaint.</p> |
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## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 2.1            | <p>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.</p> | Yes              | <p><a href="#">Complaints Policy</a> 4.5 and 4.6</p> <p><a href="#">Quality Assurance Framework-Complaints</a></p> | <p>This is set out in section 4.6 of our Complaints Policy and each case is considered on its own merits.</p> <p>The Southern Housing Quality Assurance framework, which includes all complaints handled on behalf of Triathlon Homes, ensures that the requirements of the code are monitored and met.</p> |
| 2.2            | <p>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.</p>   | Yes              | <p><a href="#">Complaints Policy</a> 4.5, 7.7</p>  | <p>Our Complaints Policy (section 4.5 and 7.7) highlights the circumstances where we might not accept a complaint or escalation. Where we do not accept a complaint, we will explain why and give advice and support to residents to help resolve the matter.</p>   |

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|     | <p>Acceptable exclusions include:</p> <p>The issue giving rise to the complaint occurred over twelve months ago.</p> <p>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</p> <p>Matters that have previously been considered under the complaints policy.</p> |     |  | <p>We continually liaise with teams to make sure complaints are channelled through to the Complaints Team correctly.</p>   |
| 2.3 | <p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>                              | Yes | <p><a href="#">Complaints Policy 4.1</a></p> | <p>Our Complaints policy (section 4.1) details that we'll accept complaints within 12 months of the issue happening or complainants becoming aware of the issue. In the policy we also state that we'll use discretion to accept older complaints.</p> |
| 2.4 | <p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints</p>  | Yes | <p><a href="#">Complaints Policy 4.6</a></p> | <p>If we refuse to accept a complaint, the reasoning, evidence and details of how to take that decision to the Ombudsman is included in written communication with the resident.</p>   |

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|     | 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. |     |                                       |  |
| 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 Policy 4.6</a> | All complaints are considered on the individual circumstances of each case. Refusals are only made in line with our Complaints policy. |

### 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 | Yes              | <a href="#">Complaints Policy 5.0, 5.2</a><br><br><a href="#">Putting it right Leaflet</a><br><br><a href="#">Reasonable Adjustment Policy 8.1, 8.2</a> | <p>Complaints are accepted in many ways. For example our website, online customer portals, phone, letter, email or in person.</p> <p>In our Complaint Policy (section 5.0 and 5.2) we commit to taking individual preferences into account for residents who need to access the complaints process and when communicating with us in line with our Reasonable Adjustments policy and the Equality Act 2010.</p> |

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|     | access the complaints process.  |     |                                       | Our complaint handlers are trained on the Reasonable Adjustment Policy. Our technology systems prompt complaint handlers to find out the needs and circumstances that we need to take into account. Complaint handlers note the information on our technology systems.   |
| 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 | <a href="#">Complaints Policy 5.1</a> | <p>Complaints are accepted in many ways. For example our website, online customer portals, phone, letter, email or in person. We accept complaints to all colleagues.</p> <p>All colleagues are made aware of the Complaints Policy, Procedure and process for raising a complaint.</p> <p>All colleagues have an objective set to embed the Complaints policy and process</p>   |
| 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 Policy</a>     | <p>From April 2023 to March 2024, we received 49 complaints.</p> <p>Our complaints policy is available on our website showing residents how to make a complaint.</p> <p>We're using complaints to learn lessons, and this drives our improvement plans. For example, we're reviewing the delivery of repairs, reviewing our managing agent relationships and making improvements to our rent and service charge processes.</p> |

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| 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 Website link</a><br><br><a href="#">Putting it right Leaflet</a><br><br><a href="#">Complaints Policy 6.0, 7.0</a> | Our Complaints Policy outlines our two-stage process with details of each stage. It is printed, translated, or provided in large print when required by residents. Our leaflet called 'putting it right' provides a simple explanation of the complaints process.   |
| 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 Policy 1.7</a>   | Section 1.7 of our Complaints Policy details that this information is on our website and in our 'putting it right' leaflet.   |
| 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 Policy 3.2</a><br><br><a href="#">Reasonable Adjustment Policy 8.1</a>   | <p>We accept and progress complaints via third parties as detailed in our Complaints Policy.</p> <p>In line with our Reasonable Adjustments policy and Complaints Policy, we ask if residents wish to be represented or accompanied throughout their complaint. We confirm arrangements to residents in the complaint</p> |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the  | Yes | <a href="#">Complaints Policy 4.3, Section 8.</a><br><br><a href="#">Website link</a>   | The complaints page on our website, complaints policy, and leaflet, all provide information for residents about to access the Housing Ombudsman Service at any time during the complaints process. We include details of the Housing Ombudsman Service,   |



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|  | Ombudsman about their complaint. |  | <a href="#">Putting it right Leaflet</a> | and residents' right to seek their help in our standard letters. |
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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="#">Quality Assurance Framework- Complaints 2.2</a> details the responsibility of the Complaints Resolution team | Southern Housing's dedicated Complaints Resolution Team is responsible for the management and oversight of Triathlon Homes complaints, including liaison with the Housing Ombudsman.<br><br>Compliance and reporting for complaints to our governing body is the responsibility of the Managing Director. Southern housing provide a quarterly 'learning from complaints' review which is discussed by the governing body. |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes              | <a href="#">Quality Assurance Framework- Complaints 2.3</a>  | The Complaints Resolution team liaise with all levels of appropriate colleagues and have the authority and autonomy to resolve disputes. Complaint handlers are empowered to act quickly and fairly including the delegated authority to make compensation payments.   |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning  | Yes              |  | Complaint handling is a priority for Triathlon Homes. Every colleague has a complaint objective and our provider, Southern Housing,  |

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|  | <p>from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p> |  |  | <p>invested significant resources to improve complaint handling in 2023.</p> <p>Training plans for complaint handlers include HOS online training for dispute resolution, record keeping, and damp and mould. Included in our corporate training matrix are sessions which facilitate and develop colleagues' skills on the following: how to act to resolve disputes quickly and fairly, how to show empathy and understanding, dealing with upset and distressed residents, and accessing support.</p> <p>Training is provided to all frontline colleagues to embed the importance of putting things right when we've got it wrong, learning from complaints to prevent reoccurrence and improve the customer experience. Complaints are discussed at operational team meetings and contractor performance meetings.</p> <p>Southern Housing is currently updating its corporate training plan requirements and delivery schedules following contractor changes and colleague change management programmes. This will ensure that training is delivered to the right teams and refresher sessions delivered appropriately. Training plans will be complete by July 2024 and training will be conducted throughout the year to March 2025. These teams provide services for Triathlon Homes.</p> |
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|  |  |  |  | <p>Complaint handlers are empowered to act quickly and fairly, this includes the authority to make compensation payments.</p> <p>The Complaints Team is resourced to handle complaints.</p> |
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## 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 Policy 3.5</a>  | <p>Our Complaints Policy (section 3.5) stipulates that residents will not be treated differently if they complain.</p> <p>We will review our complaints leaflet, 'Putting it right' by October 2024 to make sure residents understand that they will not be treated differently if they complain.</p> |
| 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 | Yes              | <a href="#">Complaints Policy Section 6- Stage one</a><br><a href="#">Section 7- Stage two</a><br><br><a href="#">Putting it right Leaflet</a> | We clearly define the stages of our complaint procedure in our Complaints Policy and in our Putting it Right leaflet. Both of which are available on our website. We do not have an informal stage.   |

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|     | complaint') as this causes unnecessary confusion.   |     |   |   |
| 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 Policy</a><br>Section 6- Stage one<br>Section 7- Stage two | Our Complaints Policy is a two-Stage Process.   |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes |   | All complaints are handled by Southern Housing and follow a two stage complaints process. All residents follow only this process.         |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Yes | <a href="#">Complaints Policy</a>   | All complaints are handled by Southern Housing and we have ensured they are handling all complaints in line our policy and with the Code. |
| 5.6 | When a complaint is logged at Stage 1 or  | Yes | <a href="#">Complaints Policy</a><br>6.1, 7.3                                     | When acknowledging complaints at Stage one and two, we contact residents to ensure we   |

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|     | 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.  |     | <a href="#">Quality Assurance Framework-Complaints 2.7</a>  | understand the complaint and required resolution. We summarise our understanding in writing giving residents the opportunity to highlight if something is misunderstood.  |
| 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 Policy 6.1, 7.3</a>  | We discuss with residents at the earliest opportunity where we’re unable to meet a desired outcome or expectation and explain why. We set out in our communication and responses to residents what we are and are not responsible for.  |
| 5.8 | At each stage of the complaints process, complaint handlers must: <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</li> </ul> | Yes | <a href="#">Complaints Policy Quality Assurance Framework-Complaints 2.4</a> and through monitoring and compliance controls 7.0 | <b>Training- Fairness and putting things right.</b><br><br>The Complaints Resolution Team follow an induction and training plan to ensure appropriate complaint handling skills are in place. This includes dealing with complaints on its merits, acting independently and with an open mind.<br><br>Training plans for complaint handlers include HOS online training for dispute resolution, record keeping, damp and mould. Dispute resolution focuses on the principles of acting fairly, putting things right and learning from outcomes. |

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|  | <p>perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p> |  |  | <p>Training is provided by the Complaints Resolution Team and trainers to frontline colleagues.</p> <p><b>Helping residents to set out the position:</b></p> <p>As part of our complaints process, we contact the resident to fully understand the complaint and the outcomes being sought, the circumstances and any adverse findings as a result of our investigations. If applicable, we'll also contact any colleagues who are the subject of the complaint. A final response is then sent outlining the decision and escalation routes.</p> <p>The Complaints Resolution team are expected to demonstrate and record the reasoning for outcomes and decisions within complaint responses. This is monitored through the Quality Assurance Framework.</p> <p>Complaint handlers are empowered to act quickly and fairly including having delegated authority to expedite compensation payments.</p> <p><b>Conflict of Interest</b></p> <p>The Complaints Resolution Team are independent and impartial and are managed separately from service delivery teams - for example, the repairs team or lettings teams. Processes are in place to ensure reporting to Triathlon Homes is transparent.</p> |
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| 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 Policy 6.4</a><br><br><a href="#">Quality Assurance Framework-Complaints</a> , Section 7. | <p>Complaint handlers aim to establish the frequency and methods of updates at first contact and are directly contactable throughout the process. Agreements made are included in the acknowledgement letters.</p> <p>We recognise this as an area we can improve. We have increased the size of the team to help improve the way we keep residents up to date.</p> <p>We've reviewed our complaints process and standard letters to ensure that every letter now details how and when we will keep residents informed about their complaint. This is monitored through the <a href="#">Quality Assurance Framework-Complaints</a> , Section 7.</p> |
| 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="#">Complaints Policy 5.2</a><br><br><a href="#">Reasonable Adjustment Policy</a> Section 7 and 8        | <p>We ask residents if there are particular circumstances that we need to be aware of when we are contacting about a complaint. This information is recorded by complaint handlers and reasonable adjustments are made. This includes how we communicate during the complaints process.</p> <p>Our systems prompt complaint handlers to understand residents' circumstances and to act accordingly. This includes making reasonable adjustments, the frequency of updates and best method of communications with the resident.</p>  |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure   | Yes | <a href="#">Complaints Policy 7.1, 7.7</a>   | <p>Our reasons for not accepting a complaint are outlined in our Complaints Policy. This list is not exhaustive, and each case will be looked at on its own merit.</p>  |

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|      | <p>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.</p>   |     |   | <p>Our Complaints Policy outlines 20 working days to escalate a complaint to the next stage. We consider requests after this time if there is good cause.</p>   |
| 5.12 | <p>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.</p> | Yes | <p><a href="#">Quality Assurance Framework-Complaints-Section 7</a></p> | <p>Our complaints process ensures we capture all records of communications, documents and decisions of every case on our internal case management systems. Records are monitored. We carry out checks to make sure we are doing this consistently and will act on any issues arising.</p> |
| 5.13 | <p>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.</p>                                     | Yes | <p><a href="#">Complaints Policy</a></p>                                | <p>Our aim is to remedy the complaint at the earliest opportunity at all stages of the complaint in line with our complaints policy.</p>  |
| 5.14 | <p>Landlords must have policies and procedures in place for managing</p>   | Yes | <p><a href="#">Unacceptable Behaviour Policy</a><br/>3.4, 5.1 , 6.1</p> | <p>We have an Unacceptable Behaviour Policy which is also referred to in our Complaints Policy.</p>   |



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|      | 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. |     | <a href="#">Complaints Policy 3.4</a>               | In line with our Unacceptable Behaviour policy, we will evidence any behaviour that has led to a restriction being put in place and provide a timeline for a review of that decision.  |
| 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="#">Unacceptable Behaviour Policy 3.4</a> , | Our Unacceptable Behaviour Policy ensures that individual equality impact assessments are conducted prior to any restrictions being put in place for residents contact to ensure they are reasonable and proportionate. These are reviewed periodically. |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation   |
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| 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 | Yes              | <a href="#">Complaints Policy 5.2</a> ,<br><a href="#">Quality Assurance Framework- Complaints 2.5</a> | All complaints are assessed to understand what is required to fully consider the issues and resolution actions. Actions are prioritised to ensure the complaint is resolved as quickly and fairly as possible.<br><br>Complaints Resolution Leads identify vulnerabilities and risk during communication |

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|     | 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. |     |  | with residents in line with our Reasonable adjustments and vulnerabilities policy. They use this to prioritise actions and provide a response at the earliest opportunity.  |
| 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 Policy</a><br>6.1 | <p>We define the stages of our complaint process in our Complaints Policy and it's available on our website. When a complaint is requested, we commit to logging and acknowledgement within 5 working days of receipt.</p> <p>While our policy complies with the Housing Ombudsman Code between April 2023 to March 2024 we acknowledged 93% of complaints in 5 days.</p> <p>We have made changes that have led to improvement, and these include:</p> <ul style="list-style-type: none"> <li>• Increased size of team</li> <li>• Reorganised how we handle complaints are handled</li> <li>• Changed our policy and processes</li> <li>• Additional training for the complaints team and key service delivery teams</li> </ul> |
| 6.3 | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the  | Yes | <a href="#">Complaints Policy</a><br>6.3 | This timescale is included in our Complaints policy and process. Compliance and performance is monitored and reported to management and governance groups.  |

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|     | complaint being acknowledged.   |     | <a href="#">Quality Assurance Framework- Complaints-</a> Section 7 | <p>While our policy complies with the Housing Ombudsman Code from April 2023 to March 2024, we answered 77% in the required ombudsman standard (Within 10 days or with an agreed extension up another 10 days).</p> <p>We have made changes that have led to improvement, and these include:</p> <ul style="list-style-type: none"> <li>• Increased size of team</li> <li>• Reorganised how complaints are handled</li> <li>• Changed our policy and processes</li> <li>• Additional training for the complaints team and key service delivery teams</li> </ul> |
| 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 Policy</a> 6.4                              | If during our investigation we need more time to respond we'll contact the resident and explain the reasons and seek agreement. Then we will confirm this in writing.   |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be  | Yes | <a href="#">Complaints Policy</a> 6.4                              | We signpost the resident to the Housing Ombudsman Service for independent advice or review when we have to extend a timescale for   |

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|     | provided with the contact details of the Ombudsman.   |     |  | responding. The contact details are provided in our letter templates.   |
| 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 Policy</a><br>6.5   | We send a response as soon as we know the outcome of the complaint. This may be before we've completed all the actions required to remedy the issue.<br><br>Our responses include an action plan for remaining actions with expected completion dates.        |
| 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 | <a href="#">Complaints Policy</a><br>6.5   | Complaint handlers ensure that all concerns agreed in the written acknowledgment are fully answered in the complaint response.  |
| 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                                       | Yes | <a href="#">Complaints Policy</a><br>6.2<br><br><a href="#">Quality Assurance Framework- Complaints</a> 2.12 and Section 7 | Section 6.2 of our Complaints policy states how we'll incorporate additional complaints to the Stage 1 response unless we've already issued a response, or it would unreasonably delay our response. Where this is the case, we'll log it as a new complaint. |

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|     | unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must 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 | <a href="#">Complaints Policy</a> 6.5<br><br><a href="#">Quality Assurance Framework- Complaints</a> 4.2 and Section 7 | <p>All of these details are provided in our response are included in our Complaints Policy, process and training.</p> <p>We use plain language in our responses to residents. We have standard letters to help ensure consistency and we quality check samples of letters in line with our quality assurance framework</p> |

**Stage 2**

| Code | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| provision |   |     |   |  |
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| 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 Policy 7.1, 7.7</a><br><br><a href="#">Quality Assurance Framework- Complaints 5.1</a> | Our Complaints policy details how we will escalate to Stage two, our final response, if the complaint is not resolved to the residents satisfaction.<br><br>We provide the Housing Ombudsman Service contact information should the resident not agree with our decision.  |
| 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 Policy 7.1, 7.3,</a>   | When a stage two escalation is requested we commit to logging and acknowledgement within 5 working days of receipt.<br><br>When acknowledging Stage 2 complaints we summarise our understanding of the issues outstanding and the desired outcomes. Where possible we will phone a resident to gain a further understanding of the issue. We include as part of our standard letters a way for the resident to highlight if something is missed or misunderstood within the letter or email. |
| 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 Policy 7.2</a>   | We do not require an explanation of reasons for requesting a Stage 2 review. We do seek to understand why the resident remains unhappy and the outcomes they are seeking to resolve the complaint so that we can give an effective response.   |
| 6.13      | The person considering the complaint at stage 2 must  | Yes | <a href="#">Complaints Policy 7.4</a>   | Our Complaints policy states that an appropriately trained colleague with no previous  |

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|      | not be the same person that considered the complaint at stage 1.  |     |  | involvement in the complaint will conduct the review.   |
| 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 Policy 7.5</a>      | <p>This timescale for response is included in our policy and process. Compliance and performance is monitored and reported to management and governance groups.</p> <p>We have responded to 100% of Stage 2 complaints in line with the code from April 23 to March 24.</p> <ul style="list-style-type: none"> <li>•</li> </ul> |
| 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 Policy 7.6</a>      | If during our investigation we need more time to provide a response, we'll inform the resident and explain and document why additional time is needed to resolve the complaint. We'll confirm this in writing.  |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be  | Yes | <a href="#">Complaints Policy 7.6, 8.1</a> | For any extension to timescales, we will signpost the resident to the Housing Ombudsman Service for independent advice or review. The contact details are provided in our   |

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|      | provided with the contact details of the Ombudsman.   |     |  | letter templates and these are monitored for quality.  |
| 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 | <a href="#">Quality Assurance Framework- Complaints</a> - 4.1 and section 7.   | <p>We send a response as soon as we know the outcome of the complaint. This may be before we've completed all the actions required to remedy the issue.</p> <p>Our responses include an action plan for any remaining actions with expected completion dates.</p> <p>We have improved the tracking system and processes from April 2024. We will look to make further improvements when we make technology system changes in December 2024.</p>  |
| 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 | <a href="#">Quality Assurance Framework- Complaints</a> 4.2 and Section 7<br><br><a href="#">Complaints Policy</a> 7.5 | <p>Complaint handlers ensure that all concerns agreed in the written acknowledgment are fully answered in the complaint response.</p> <p>Our template response letters include guidance for colleagues to help with consistency. These sections include the complaint definition, the outcomes the resident was seeking and the findings of our investigation against each point, referencing supporting policy, law or best practice where appropriate.</p> <p>Responses are checked through our Quality Assurance framework.</p> |



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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> <ol 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> </ol> | Yes | <p><a href="#">Complaints Policy 7.5, 8.0</a></p> <p><a href="#">Quality Assurance Framework- Complaints 4.2, 5.2 and Section 7.</a></p> | <p>All of these details are provided in our response are included in our Complaints Policy, training and our stage two response templates.</p> <p>.</p> <p>A senior member of the Complaints management team completes monthly quality control audits against closed complaints.</p> <p>As well as in our standard response templates, section 8.0 of our policy details how to escalate the matter to the Housing Ombudsman Service if residents remain dissatisfied.</p> |
| 6.20 | <p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>   | Yes | <p><a href="#">Quality Assurance Framework- Complaints 5.4</a></p>   | <p>After gaining an understanding of the outcomes required for the complaint to be resolved at acknowledgement stage, the case officer arranges a meeting with all appropriate colleagues to support the resolution and response.</p> <p>A Senior Complaints Resolution Lead or Complaint Resolution manager reviews and signs off of all Stage 2 response letters. This ensures that all relevant colleagues have been</p>  |

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|  |  |  |  | involved in investigating and responding to the complaint and that appropriate redress has been considered. |
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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> </ul> | Yes              | <a href="#">Quality Assurance Framework- Complaints 4.2</a> | <p>In our responses to residents, we apologise, acknowledge where things went wrong and say what we'll do to fix the problem. We offer compensation in line with our complaints and compensation policies.</p> <p>We outline in our response where lesson have been learnt and any improvements that have been made as a result of the complaint where applicable.</p> |

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|     | <ul style="list-style-type: none"> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>  |     |   |  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes |   | We use the Housing Ombudsman remedies guidance to offer consistent remedies that reflect the extent of service failure and detriment caused to the resident. Remedies for repairs would be carried out in line with our Repairs Policy.  |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | <a href="#">Quality Assurance Framework- Complaints 4.2 and Section 7</a> | <p>We send a response as soon as we know the outcome of the complaint. This may be before we've completed all the actions required to remedy the issue.</p> <p>Our responses include an action plan for any remaining actions with expected completion dates.</p> <p>Offer of compensation in a response will detail the next steps, if the resident wishes to accept the offer.</p> |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes |   | Remedies offered are in line with Housing Ombudsman remedies guidance, Redress Framework and Right to Repair.  |

## Section 8: Putting things right

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|---|------------------|---|---|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <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> </ul> | Yes              | Complaints performance and Service Improvement report is being produced | <p>In June 2024 we'll publish our Self-Assessment, Complaints performance and Service Improvement report on our website. This will have been scrutinised by Board and a responded to in line with requirements.</p> <p>We have introduced a more robust monitoring system to track the types of complaints refused from April 2024 in line with the new requirements.</p> <p>Triathlon have received no findings of non-compliance with the code by the Ombudsman.</p> <p>As there have been no determinations there is no annual report about Triathlons performance from the Ombudsman.</p> |

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|     | <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>  |     |   |   |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this. | Yes | Complaints performance and Service Improvement report is being produced | Our self-assessment, annual complaints performance and service improvement report are available on our website and reported to the Board annually, or upon any significant changes. From June 24, the Board's response to the report will also be published alongside this. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes |   | We restructured our complaints handling team in October 2023 and increased the size of the team. This self-assessment has been completed after the changes to the team.   |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes |   | We will review and update this self-assessment if required to do so.  |
| 8.5 | If a landlord is unable to comply with the Code due to  | Yes |   | We're able to comply with the code with the exception of provisions 9.5, 9.6 and 9.7 which  |

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|  | 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. |  |  | relate to the appointment of a Member Responsible for complaints.<br><br>We will have appointed a MRC and will meet compliance with these provisions by 31 July 2024. |
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### Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation  |
|----------------|--|------------------|---|---|
| 9.1            | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes              | Complaints performance and Service Improvement report | <p>We review lessons learnt from complaints and take action to make improvements to improve resident experience prevent further complaints.</p> <p>Our service delivery benefits from the Lessons Learnt framework developed by our service provider. It helps us to discover, create solutions/improvements, and promote lessons learnt from Complaints, Tenant Satisfaction Measures and other sources of insight. This framework focuses on:</p> <ul style="list-style-type: none"> <li>Identifying key themes and root causes of dissatisfaction</li> <li>Shaping and prioritising operational improvement plans</li> </ul> |

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|     |  |     |  | <ul style="list-style-type: none"> <li>Identifying policies, procedures and guidance for review</li> <li>Identifying training and awareness needs</li> <li>Communicating success stories with residents and staff to demonstrate we're listening and acting on feedback.</li> </ul> <p>Lessons learnt from complaints and services improvements made over the last year are outlined in our Annual Service improvement report.</p> <p>Performance monitoring is also in place for contractors to ensure that wider issues are identified, discussed and monitored. Action plans are put in place to address any improvements required.</p> |
| 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 | Complaints performance and Service Improvement report. | <p>We review lessons learnt from complaints and take action to make improvements to improve resident experience prevent further complaints.</p> <p>Our process ensures that any lessons learnt from complaints are discussed with colleagues and documented at the point of case closure.</p> <p>The Lesson Learnt framework helps us to discover, agree, track improvements, define the impact, and promote lessons learnt from multiple sources, including complaints.</p>   |
| 9.3 | Accountability and transparency are also integral to a positive  | Yes | Complaints performance and                             | Learning from complaints is included in our reports to Board.  |

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|     | complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.   |     | Service Improvement report                                  | <p>Our annual service improvement report, outlines lessons learnt from complaints is also available on our website.</p> <p>We can improve consistency in this area and have begun changing the way we approach communicating with residents about our lessons learnt from April 2024.</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 |   | <p>Complaints handling and policy ownership for Triathlon Homes is overseen by the Managing Director.</p> <p>Lessons from complaints and other sources are reviewed by senior leaders and included in performance reports.</p>  |
| 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  | No  | Appendix 1 – Proposed Board Complaint Lead Role Description | In line with the HOS 2024 Code, we are appointing a Member Responsible for Complaints (MRC) by July 2024. The appointed member of the Triathlon Board will have a role description outlining their responsibilities. They will be responsible for   |



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|     | complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').   |    |   | complaints and be provided regular information to ensure oversight and insight is undertaken in depth by the Board.   |
| 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.   | No | Appendix 1 – Proposed Board Complaint Lead Role Description | In line with the HOS 2024 Code, we are appointing a Member Responsible for Complaints (MRC) by July 2024. The appointed Triathlon Board member will have a role description outlining their responsibilities, including challenging performance and improvement.  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe</li> </ul> | No | Complaints performance and Service Improvement report       | Our Board receives and reviews: <ul style="list-style-type: none"> <li>• regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</li> <li>• regular reviews of issues and trends arising from complaint handling.</li> <li>• regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with any orders related to severe maladministration findings.</li> <li>• annual complaints performance and service improvement report.</li> </ul> Once appointed, our MRC will also receive this information. |

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|     | <p>maladministration findings;</p> <p>d. annual complaints performance and service improvement report.</p>  |     |  |   |
| 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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with staff 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> | Yes |  | All colleagues have a standard objective in relation to complaints. |

## Appendix 1 – Proposed **Board Complaint Lead Role Description**

This role is responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance (Housing Ombudsman Self-Assessment Guidance).

There are two aspects to the role:

- Support Complaints Handling Compliance
- Support Learning and Awareness

### **Support Complaints Handling Compliance**

- Have an expert understanding of Housing Ombudsman guidance.
- Assist with reviewing the annual self-assessment.
- Assist with Ombudsman investigations when they're referred to the governing body.
- Ensure the Board receive regular information on complaints that provides insight and learning on complaint handling performance.
- Promote a positive complaints culture at Board.

### **Support Learning and Awareness**

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- Support the team by giving feedback on the complaints policy and key documents.
- Share learning and best practice, inside and outside the housing sector. Hold an annual best practice review with Southern Housing's Director of Customer Experience, Triathlon Homes' Managing Director and senior complaints managers.
- Review the Ombudsman annual landlord complaint performance report and consider performance against peers.
- Provide feedback on the complaints section of the annual review for residents.
- Ensure Triathlon Homes' complaints handling provider meets best practice guidelines and supports the organisation to learn from complaints and improve its services.