Karbon Complaints Handling Code Self-assessment April 2024

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Complaints, Compliments and Suggestions policy page 1 and 3. Making a complaint	This definition was adopted in March 2021 and has remained in our Complaints, Compliments and Suggestions policy ever since. This is also in our colleague procedure.
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	Complaints, Compliments and Suggestions policy page 3, point 2.12 states that: A customer does not have to use the word 'complaint' for it to be treated as one. If a customer expresses dissatisfaction, we will give them the option to make complaint. In both points 2.2, 2.9 and 2.43 we state how customers can complain thought a third party. Making a complaint	In our Complaints, Compliments and Suggestions policy we outline that customers do not need to use the word complaint and that we accept complaints though 3 rd parties or representatives. In our customer leaflet, audio video and in our dedicated complaint section on our website we also provide links or signpost to independent advice and support. Our procedure details by role the responsibility to provide the choice.
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	Complaints, Compliments and Suggestions policy service request definition is on page 1.	In our Complaints, Compliments and Suggestions policy we define a service request.

	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.		Making a complaint	Our customer leaflet also explains more about service requests. We record service requests in the appropriate system, including our main database Capita. Our procedure further outlines for colleagues what service requests are and how we record them.
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	Complaints, Compliments and Suggestions policy, point 2.13 states that: 2.13 A complaint will be raised at the customer's request, even if the handling of the service request remains ongoing. We will not stop acting on a service request if the customer complains. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues this importance.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	The words in the telephone script: If you are dissatisfied with the service provided by Karbon they do have a complaints process you can access by calling 0808 164 0111 or info@karbonhomes .co.uk and you can find more information on their website www.karbonhomes.co.uk/compl aints.	In our telephone survey scripts we have included an explanation on how a customer can pursue a complaint. Our Complaint, Compliment and Suggestions procedure further outlines the responsibility of our team who manages our survey partners.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints, Compliments and Suggestions policy, point 2.16 states that: Complaints will be considered in it's individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues in how they communicate and record this.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been	Yes	Complaints, Compliments and Suggestions policy, point 2.17 states those mentioned in the code, plus: service requests, the issue occurred over 12 months ago, annual rent and service charge increases which must be escalated thorough the First Tier Tribunal, services not within our control e.g. Utilities, complaints about our money advice service heard in line with the Financial Conduct Authority process. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues in how they communicate and record this.

	considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints, Compliments and Suggestions policy, point 2.14 states Complaints must be raised within 12 months, as close as possible to when the issue first arose or when the customer first became aware of the problem. 2.16 also states that: Complaints will be considered in it's individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman. 2.17 also states that: Unless there is good reason, complaints excluded from our complaints process are (where) issue giving rise to the complaint occurred over twelve months ago. 2.42 also states: If a complaint is raised or escalated outside of the 12 months, we apply discretion to accept those outside this time limit, where there are good reasons to do so.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues guidance a section on refusing complaints, including this timescale. Our customer leaflet and video also highlight complaints are accepted in the Code timescale.

2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Making a complaint Complaints, Compliments and Suggestions policy, point 2.16 states that: Complaints will be considered in it's individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues in how they communicate and record this. We also provide colleagues a letter template to use to ensure the explanation is clear and to share the Ombudsman's role, contact details and their right to take this to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Making a complaint Complaints, Compliments and Suggestions policy, point 2.16 states: Complaints will be considered in it's individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman. 2.17 lists scenarios where we will not hear a complaint and at the start states that: Unless there is good reason Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues, with a section on refusing complaints. For those handling complaints it also provides guidance on assessing the complaint, considering the context of the complaint and the complainant.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints, Compliments and Suggestions policy, point 2.2 outlines all the different channels through which customers can make a complaint, including email, telephone, writing, with a colleague, Direct Messages on Karbon social media and though an advocate. Section 7 in the policy outlines our equality and diversity position including the Public Sector Equality Duty and Equality Act. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues how we support customers through the process, including examples of adjustments. Our letter templates either seek to clarify any required adjustments or clarifies what has been agreed. Our customer materials are presented in different formats, with more versions available on request, to ensure the service is accessible.
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	Complaints, Compliments and Suggestions policy, point 2.2 states that customers can express a complaint: With any Karbon colleague, who will pass this to the appropriate person. Our procedure outlines: Where a customer expresses dissatisfaction, seek to support them within their remit and seek clarification if the customer wants to raise a complaint. If the customer wants to complain, the colleague will record a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines the role of all colleagues including this.

			on the ICT system the day it is received, or the next working day. If they cannot do this, then they should raise this to a colleague who can record it or signpost the customer to contact the Customer Relationship Team who can do this. Making a complaint	
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	Complaints, Compliments and Suggestions policy, point 1.2 states that: Karbon is committed to providing an excellent customer service, through the effective handling and learning from complaints, compliments and suggestions. At 2.1 it states: We want to ensure all customers can raise a complaint when they want to and the process is clear and easy to follow. Our annual report illustrates our focus on complaint volumes, with a 182% increase on prior year. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this by expressing our commitment to complaints and our complaint culture. Our procedure further outlines for colleagues our complaints culture. Our customer materials and dedicated section on the website welcomes complaints. One of our main areas of focus in 2023/24, which continues this year, is ensuring confidence in our complaint volumes. Our Board commissioned a deep dive report on this. With customer awareness, colleague awareness of ways of working, and close monitoring of complaint volumes we are seeing volumes increase consistently, as outlined in the annual report, with a

				182% increase on prior year.
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	The Complaints, Compliments and Suggestions policy is published on our website, with the policy section and the dedicated complaint section on the website. The two-stage process is explained in 2.18 and 2.19. Standards including timescales are outlined in 2.28 and 2.29. Then through 2.30-2.45 we explain each stage and how escalations work. The customer materials are all found on the dedicated website section here. Making a complaint	Our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues the stages in finer detail. Our customer materials, including a leaflet (plaint text version), audio video and infographic present the process in different ways, to ensure this is accessible to customers.
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	Complaints, Compliments and Suggestions policy, point 2.1 states how we communicate how to make a complaint. Sections 2.4-2.6 outlines the role of the Ombudsman and how to contact them. Our website and customer materials are all found on the dedicated website section here. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our dedicated section on our website and our customer materials, namely leaflet, video and infographic all present the role of the Ombudsman for customers.
3.6	Landlords must give residents the	Yes	Our Complaints, Compliments	In our Complaints, Compliments and

	opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		and Suggestions policy provides a definition of an advocate. In section 2.2 we offer a range of ways for customers to make a complaint including: Via a Councillor, MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation) or advocate. In 2.43 we also explain different adjustments including: Allowing complaints raised or supported through a customer's designated advocate. This could be an MP, Councillor, third party or a family member. Support may include representing or accompanying customers in meetings. Making a complaint	Suggestions policy we support this. Our procedure further outlines for colleagues how we support customers with a representative.
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	Complaints, Compliments and Suggestions policy, sections 2.4-2.6 outline the role of the Ombudsman and how to contact them. Our website and customer materials are all found on the dedicated website section here. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Out procedure outlines to colleagues the communication points where the customer should be informed about their right to access the Ombudsman and how they can do this. We have provided letter templates to colleagues to ensure this is consistent. Our dedicated section on our

		website and our customer materials,
		namely leaflet, video and infographic all present the role of the
		Ombudsman for customers.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Karbon operates a devolved approach to complaint handling, with appropriate operational colleagues handling complaints. Our Customer Experience team provide a central support, which includes Ombudsman liaison. From this team, the Customer Feedback Specialist is responsible for Ombudsman liaison, whilst colleagues in the team may support in their absence. The Head of Customer Experience is responsible and Assistant Director of Customer Experience accountable for providing our Group Board with the quarterly and annual reporting.	Our Complaints, Compliments and Suggestions procedure outlines for colleagues the roles across the organisation including: complaint handling, Ombudsman Liaison and Board reporting.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints.	Yes	Complaints, Compliments and Suggestions procedure outlines the role of the Complaint Handler	In our Complaints, Compliments and Suggestions procedure we support this.

	They must also have the authority and autonomy to act to resolve disputes promptly and fairly.		and Customer Experience team. For Complaint Handlers, we indicate the level of role in the organisation, at each stage, so we they have the authority and autonomy to act.	
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	Complaints, Compliments and Suggestions policy, section 3 outlines our approach to continuous learning and Improvement. Section 2.21 also outlines our complaint culture for complaint handlers, which is expanded on in our procedure. Our procedure further explains to all colleagues, highlighting our values and behaviours, not least the way we work with our customers. It highlights the importance to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any	In our Complaints, Compliments and Suggestions policy we support our approach to learning from complaints. Our procedure provides guidance to colleagues of the process and best practice. We have a Learning Management system which includes modules for complaint handlers, on the procedure, best practice and system. Where any changes arise, we brief relevant colleagues through our intranet and directly to complaint handlers via email. Formal 121 and team training session are provided as required, for new colleagues, where new systems have been introduced and for teams requiring additional guidance.

	relevant professional body.	
	Making a complaint	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints, Compliments and Suggestions policy outlines our culture, whilst our procedure goes further highlighting our values and behaviours, not least the way we work with our customers whether they complain or not. Making a complaint	We have one Complaints, Compliments and Suggestions policy. Our complaint culture, outlined in our procedure outlines for colleagues how we treat customers.
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	Complaints, Compliments and Suggestions policy explains the two-stage process in 2.18 and 2.19. In section 2.23 the complaint handler is tasked to: They will consider the context of the complaint including factors in 2.21 and 2.22, and the customer's preferences, to consider which complaints can be responded to as early as possible, and which require further investigation. 2.24 states: Appropriate remedies can be provided at any stage of	In our Complaints, Compliments and Suggestions policy we support this, with a two-stage process. Our procedure further outlines this for colleagues.

			the complaint and we will continue to resolve issues alongside any necessary investigation. This is without prejudicing consideration of the complaint or delaying the response timescales. Making a complaint	
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	Complaints, Compliments and Suggestions policy explains the two-stage process in 2.18 and 2.19. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues.
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	Complaints, Compliments and Suggestions policy illustrates that Karbon will hear all complaints, not a third party. However we may seek information from them and involve contractors in an investigation. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints, Compliments and Suggestions policy illustrates that Karbon will hear all complaints, not a third party. However we may seek information from them and involve contractors in an investigation. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this.
5.6	When a complaint is logged at Stage 1	Yes	Complaints, Compliments and	In our Complaints, Compliments and

	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.		Suggestions policy, point 2.2 states that the complaint handler's role includes: Engaging with the customer as appropriate, they will clarify, record and act on: - What the complaint is about – the complaint definition - What outcome/s would resolve the matter for the customer Making a complaint	Suggestions policy we support this. Our procedure further outlines this for colleagues who handle complaints and we provide letter templates for colleagues to ensure this is applied consistently.
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	Complaints, Compliments and Suggestions policy, point 2.2 states that the complaint handler's role includes: Engaging with the customer as appropriate, they will clarify, record and act on: If appropriate, what elements we are not responsible for Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues who handle complaints and we provide letter templates for colleagues to ensure this is applied consistently.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Complaints, Compliments and Suggestions policy, point 2.21 states this Making a complaint https://www.karbonhomes.co.uk/about-us/open-and-transparent/making-a-complaint/	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues their role in a fair, impartial and measured approach.
5.9	Where a response to a complaint will fall	Yes	Complaints, Compliments and	In our Complaints, Compliments and

	outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		Suggestions policy, point 2.25 states: They will agree with the customer the frequency and method of communication and then maintain contact as agreed. Where a response will fall outside original timescales, they will agree with the customer how they will keep them informed. Making a complaint	Suggestions policy we support this. Our procedure further outlines this for colleagues.
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	Complaints, Compliments and Suggestions policy, point 2.43 states: For customers requiring adjustments, together we will consider options and agree what is reasonable in the circumstances, keeping this under review. This goes on to list examples of adjustments. Point 2.41 states: If there is a need to deal with a complaint differently, we will agree this with the customer, record why this is, and confirm this in writing or in an appropriate way. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues how this is done.
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	Yes	In the Complaints, Compliments and Suggestions policy, in addition to points 2.16 and 2.17 referring to sections 2, point 2.65 We will escalate a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and how they

	comply with the provisions set out in section 2 of this Code.		unless there is a valid reason not to do so. Each case will be considered on its own merits.	communicate this with customers.
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	Making a complaint Complaints, Compliments and Suggestions policy, point 2.26 states: The complaint handler will ensure a full record of the complaint is maintained on our system. This will include the original complaint, date received, all correspondence with the customer and relevant parties, any supporting documentation such as reports or surveys, outcomes at each stage and any learnings. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure and system manuals further outline this for colleagues how. We also quality check records to assure us of this.
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	Complaints, Compliments and Suggestions policy, point 2.24 states: Appropriate remedies can be provided at any stage of the complaint and we will continue to resolve issues alongside any necessary investigation. This is without prejudicing consideration of the complaint or delaying the response timescales. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues.
5.14	Landlords must have policies and procedures in place for managing	Yes	Complaints, Compliments and Suggestions policy, point 2.44	In our Complaints, Compliments and Suggestions policy we support this.

	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.		states: Our Unacceptable Customer Behaviour Policy sets out our approach to managing the very few customers whose actions or behaviour are considered unacceptable. If a customer's behaviour is hampering the progress of the complaint, this will be explained to them, to get to a position to respond to their complaint. Where this persists, we will conclude the complaint based on available information. Making a complaint Unacceptable Customer	Our procedure further outlines this for colleagues. We have an Unacceptable Customer Behaviour Policy
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act	Yes	Behaviour Policy Our Complaints, Compliments and Suggestions policy and Unacceptable Customer Behaviour Policy both make provisions for the Equality Act.	Our Complaints, Compliments and Suggestions policy and Unacceptable Customer Behaviour Policy both support this.
	2010.		Making a complaint Unacceptable Customer Behaviour Policy	

Section 6: Complaints Stages

Stage 1

Code	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
provision		163 / 110		

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	Complaints, Compliments and Suggestions policy explains in section 2.23 the complaint handler is tasked to: They will consider the context of the complaint including factors in 2.21 and 2.22, and the customer's preferences, to consider which complaints can be responded to as early as possible, and which require further investigation. 2.22 refers to the complaint definition, any risks and customer vulnerabilities. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaints, Compliments and Suggestions policy, point 2.28 states the standards at stage 1 and this includes this. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints, Compliments and Suggestions policy, point 2.28 states the standards at stage 1 and this includes this. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
6.4	Landlords must decide whether an extension to this timescale is needed	Yes	Complaints, Compliments and Suggestions policy, point 2.28	In our Complaints, Compliments and Suggestions policy we support this.

	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.		states the standards at stage 1 and this includes this. Making a complaint	Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
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	Complaints, Compliments and Suggestions policy, point 2.4 states: Customers can obtain advice from the Ombudsman throughout a complaint. Acknowledgement, extension and response letters contain their contact details. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and letter templates include these as standard.
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	Complaints, Compliments and Suggestions policy, point 2.30 states: We will provide a complaint response when this is known, in line with our published timescales. Complaints will be responded to, where rectification plans are in place but may not have been concluded. This means not waiting for the completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Cases are closed once all actions are completed.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues in more detail and our complaint system supports recording and tracking of actions.

			2.27 states: The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed. Making a complaint	
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	Complaints, Compliments and Suggestions policy, point 2.22 states that the complaint handler will clarify, record and act on the complaint definition. Our procedure and template letters support clarifying the reasons for decisions and sharing relevant information. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and our letter templates ensure that these sections are all included in the response letter.
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	Complaints, Compliments and Suggestions policy, point 2.31 states: Where a customer raises additional issues during the investigation, these will be incorporated into the response if they are related and the response has not been issued. Where the 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 will be logged as a new complaint.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues how this is implemented.

			Making a complaint	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Complaints, Compliments and Suggestions policy states at 2.20 that complaint handler is responsible to respond. The supporting procedure and the letter templates. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. The supporting procedure lists all these elements are included in the letter and the letter template lays these out.

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	Complaints, Compliments and Suggestions policy, point 2.19 states: If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it will be escalated to stage 2. Customers can request for their complaint to be escalated to stage 2 with the person hearing their stage 1, or by any of the other contact methods listed in section 2.2. Stage 2 is our final response.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues

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	Making a complaint Complaints, Compliments and Suggestions policy, point 2.29 states the standards at stage 2 and this includes this. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
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	Complaints, Compliments and Suggestions policy, point 2.36 states: Customers are asked, but not required to explain their reasons for requesting escalation to stage 2, so the investigation can address these concerns. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues how they can do this including arranging contact to understand why the customer remains unhappy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints, Compliments and Suggestions policy, point 2.20 states: A different complaint handler is allocated at each stage, to investigate and respond. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints, Compliments and Suggestions policy, point 2.29 states the standards at stage 2 and this includes this. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
6.15	Landlords must decide whether an extension to this timescale is needed	Yes	Complaints, Compliments and Suggestions policy, point 2.29	In our Complaints, Compliments and Suggestions policy we support this.

	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.		states the standards at stage 2 and this includes this. Making a complaint	Our procedure further outlines this for colleagues. We also have system alerts and reporting in place to manage this performance.
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	Complaints, Compliments and Suggestions policy, point 2.4 states: Customers can obtain advice from the Ombudsman throughout a complaint. Acknowledgement, extension and response letters contain their contact details. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and letter templates include these as standard.
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	Complaints, Compliments and Suggestions policy, point 2.30 states: We will provide a complaint response when this is known, in line with our published timescales. Complaints will be responded to, where rectification plans are in place but may not have been concluded. This means not waiting for the completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Cases are closed once all actions are completed.	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues in more detail and our complaint system supports recording and tracking of actions.

			2.27 states: The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed. Making a complaint	
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	Complaints, Compliments and Suggestions policy, point 2.22 states that the complaint handler will clarify, record and act on the complaint definition. Our procedure and template letters support clarifying the reasons for decisions and sharing relevant information. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and our letter templates ensure that these sections are all included in the response letter.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains	Yes	Complaints, Compliments and Suggestions policy states at 2.20 that complaint handler is responsible to respond. The supporting procedure and the letter templates. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. The supporting procedure lists all these elements are included in the letter and the letter template lays these out.

	dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints, Compliments and Suggestions policy, point 2.19 states that Stage 2 is our final response. At 2.29 we state that Stage 2 cases are heard by a Head of Service, Assistant Director, Director or Executive Director. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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: Apologising; Acknowledging where things have gone wrong;		Complaints, Compliments and Suggestions policy, point 2.33 states: Where something has gone wrong, any remedy reflects the impact of all failures on the customer. This may include apologising, acknowledging, explaining, taking action,	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines for colleagues different ways to act and then how they determine the appropriate actions. The response letter templates lay this out for
7.1	 Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a 	Yes	changing something and compensation. Our procedure details this further. The Compensation and Goodwill Policy	The Compensation and Goodwill Policy outlines the approach for financial remedies.
	correction or addendum; Providing a financial remedy;		Making a complaint	

	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	Complaints, Compliments and Suggestions policy, point 2.33 states: Where something has gone wrong, any remedy reflects the impact of all failures on the customer. The Compensation and Goodwill Policy Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues and letter templates lay this out for colleagues to follow. The Compensation and Goodwill Policy outlines the approach for financial remedies.
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	Complaints, Compliments and Suggestions policy, point 1.32 states: The complaint handler will oversee conclusion of all actions. Complaints will be closed by the complaint handler, after all remaining actions are concluded. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. Our procedure further outlines this for colleagues, including the complaint handler's role and letter templates lay this out for colleagues. The Compensation and Goodwill Policy outlines the approach for financial remedies.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Complaints, Compliments and Suggestions policy Making a complaint Compensation and Goodwill Payment policy The Compensation and Goodwill Policy	The Complaints, Compliments and Suggestions policy and Compensation and Goodwill policy were developed considering Ombudsman guidance.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Complaints, Compliments and Suggestions policy, point 3.2 states: On a quarterly basis, information will be reported to the Karbon Customer Committee, Karbon Management Team and Karbon's Resident Committee. The report will include all complaints, compliments and suggestion performance outlined in 'Key performance measures'. Then in 3.3: Annually, information will also be shared with the Group Board. The report will include all complaints, compliments and suggestion performance outlined in 'Key performance measures'. The 2023-24 annual complaints performance and service improvement report is included here Making a complaint	In our Complaints, Compliments and Suggestions policy we support this annual report. However we also provide this quarterly, to ensure scrutiny and challenge through the year. The annual report covers all elements outlined and more as outlined in our Key Performance Measures. This receives scrutiny from customers and colleagues as outlined in the policy. Our procedure further outlines the responsibilities of colleagues.
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	Yes	Complaints, Compliments and Suggestions policy, point 3.3 states: Annually, information will also be shared with the Group Board. The report will include all	In our Complaints, Compliments and Suggestions policy and procedure we support this.

	to complaints. The governing body's response to the report must be published alongside this.		complaints, compliments and suggestion performance outlined in 'Key performance measures'. The 2023-24 annual complaints performance and service improvement report and Board response is included here Making a complaint	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaints, Compliments and Suggestions policy, point 3.1 states: Annually we will selfassess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked. Making a complaint	In our Complaints, Compliments and Suggestions policy and procedure we support this.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Complaints, Compliments and Suggestions policy, point 3.1 states: Annually we will selfassess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked.	In our Complaints, Compliments and Suggestions policy and procedure we support this.

			Making a complaint	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Complaints, Compliments and Suggestions policy, point 2.45 states: If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to customers who may be affected and publish this on our website. This includes sharing a timescale for returning to compliance with the Code.	In our Complaints, Compliments and Suggestions policy and procedure we support this.
			Making a complaint	

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, Compliments and Suggestions procedure outlines the responsibilities for learning and continuous improvement. Case Handlers look at individual cases. Leaders are responsible for trends in the service area they are responsible for.	In our Complaints, Compliments and Suggestions policy and procedure we support this.
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	Yes	Complaints, Compliments and Suggestions policy, point 3.2 states: On a quarterly basis, information will be reported to the Karbon Customer Committee, Karbon Management Team and	In our Complaints, Compliments and Suggestions policy we support this. We have provided quarterly reporting since 2019 and have used this productively to identify issues

	delivery.		Karbon's Resident Committee. The report will include all complaints, compliments and suggestion performance outlined in 'Key performance measures'. Making a complaint Annual Customer Report	and introduce changes. The dedicated section on our website and annual report share some of these learnings
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Complaints, Compliments and Suggestions policy, point 3.2 states: On a quarterly basis, information will be reported to the Karbon Customer Committee, Karbon Management Team and Karbon's Resident Committee. The report will include all complaints, compliments and suggestion performance outlined in 'Key performance measures'. Making a complaint Annual Customer Report	In our Complaints, Compliments and Suggestions policy we support this. We have provided quarterly reporting since 2019 and have used this productively to identify issues and introduce changes. The dedicated section on our website and annual report share some of these learnings
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	Complaints, Compliments and Suggestions procedure states: The Code states we must appoint a suitably senior lead person as accountable for their complaint handling who must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. The Head of	In our Complaints, Compliments and Suggestions procedure we support this. The Head of Customer Experience is our senior lead person accountable for complaint handling.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Customer Experience, or their equivalent in title, will produce quarterly and annual performance reports on the areas outlined in 'Key performance measures'. Complaints, Compliments and Suggestions policy, point 3.4 states: The Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture. This 'Member Responsible for Complaints' oversees the complaint performance and leads on the board's response. We have strengthened this further by having a second MRC, with the Executive Director of Customer Service as the senior executive to oversee the operational side of complaints. Making a complaint	In our Complaints, Compliments and Suggestions policy we support this. The Chair of the Karbon Customer Committee is the MRC, who is a Group Board member. The Executive Director of Customer Service as the senior executive to oversee the operational side of complaints.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role	Yes	Complaints, Compliments and Suggestions policy, point 3.4 states: The Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to	In our Complaints, Compliments and Suggestions policy we support this. As chair of the Karbon Customer Committee and Group Board member they lead on the Board's authority to oversee complaint

	and report on their findings.		support a positive complaint handling culture. This 'Member Responsible for Complaints' oversees the complaint performance and leads on the board's response. We have strengthened this further by having a second MRC, with the Executive Director of Customer Service as the senior executive to oversee the operational side of complaints. Making a complaint	performance. They receive quarterly and annual performance reporting and commission work as required to gain reassurance and assurance. This is supported by the Executive Director of Customer Service.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Suggestions policy, point 3.4 states: The Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture. This 'Member Responsible for Complaints' oversees the complaint performance and leads on the board's response. We have strengthened this further by having a second MRC, with the Executive Director of Customer Service as the senior executive to oversee the operational side of complaints.	The chair of the Karbon Customer Committee and Group Board member receives this information quarterly. The Executive Director of Customer Service receives this monthly and, in some cases, weekly by exception from the Customer Experience team.