

## Complaints Handling Code – Self-Assessment 2024-25

### Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 1.2            | A complaint must be defined as:<br><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 4.2 (page 2) of the policy.</li> </ul>                        |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 4.2.1 (page 2) of the policy.</li> </ul>                      |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 4.3 (page 2) of the policy.</li> </ul>                        |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 4.5 (pages 2 and 3) of the policy.</li> </ul>                 |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 4.6 and section 4.7 (pages 2 and 3) of the policy.</li> </ul> |                          |

## 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6.1 (page 3) of the policy.</li> </ul> |                          |
| 2.2            | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul> | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6.1 (page 3) of the policy.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6.1 (page 3) of the policy.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6.2 (page 3) of the policy.</li> </ul> |                          |
| 2.5            | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6 (page 3) of the policy.</li> </ul>   |                          |

### 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 14 (page7 and 8) of the procedure.</li> <li>Complaints notices displayed in all services and verified during service compliance checks.</li> <li>Complaints can be made in a number of ways, in person, e-mail, using QR code or through an advocate acting on behalf of a resident.</li> <li>Information on how to complain is available in different formats, through the young person portal, on Centrepoint's website and in information provided to young people when they access a Centrepoint service.</li> </ul>   |   |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 14 (page7 and 8) of the procedure.</li> <li>Complaints Posters displayed in all services and verified during service compliance checks.</li> <li>Complaints can be made in a number of ways, in person, e-mail, using QR code or through an advocate acting on behalf of a resident.</li> <li>Information on how to complain is available in different formats, through the young person portal, on Centrepoint's website and in information provided to young people when they access a Centrepoint service.</li> <li>Staff are provided with a detailed complaints policy and procedure which sets out how complaints within Centrepoint are to be handled.</li> </ul> | Operations Managers in other parts of the organisation will undertake Complaints Handling Training by the end of July 2025. |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
|                |  |                  | <ul style="list-style-type: none"> <li>Young people are encouraged to raise complaints and feedback at resident's meetings.</li> <li>Operations Managers managing supported accommodation have undertaken training around complaints handling and are cascading this down to Service Managers and Deputy Service Managers.</li> </ul>   |                          |
| 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              | <ul style="list-style-type: none"> <li>Complaints across all services are monitored by the Complaints Officer.</li> <li>Managers receive weekly information about the complaints process and data on all open complaints.</li> <li>Operations Managers have undertaken training around complaints handling and are cascading this down to Service Managers and Deputy Service Managers.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6 (pages 7 and 8) of the policy.</li> <li>Complaints information is available in all services to young people. How to make a complaint is made clear on the Centrepont Website and also within the YP Portal. Young people accessing Supported Housing are provided with a Young Person's Guide, this contains information on how to make a complaint.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in sections 14-18 (pages 7 to 12) of the procedure.</li> <li>Complaints Policy published on Centrepont website.</li> <li>Complaints Poster displayed in all services, and this is verified during service compliance checks. Complaints poster is also on our external website.</li> </ul>   |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 14 (page 7) of the procedure.</li> </ul>                         |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 6 (page 3) and section 18 (page 12) of the procedure.</li> </ul> |                          |

#### 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is explained in section 5 (page 3) of the policy.</li> <li>The Complaints Officer and Compliance Team oversee complaints handling across Centrepont.</li> <li>The Complaints Officer is responsible for liaising with the Ombudsmen and providing reports to Audit and Risk Committee (ARC).</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>The Complaints Officer and members of the Compliance Team have access to staff at all levels across Centrepont.</li> </ul>   |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 Complaints &amp; Feedback Policy and Procedure contains detailed guidance around this area, (pages 5-18), and these documents are located on SharePoint for all staff to access.</li> </ul>  |                          |

## 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This policy and procedure cover all services provided by Centrepont. This is set out in section 17 (pages 9, 10 and 11) of the procedure.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 9, 10 and 11) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 9, 10 and 11) of the procedure.</li> <li>Centrepont's operates a two-stage complaints process.</li> </ul>       |                          |
| 5.4            | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.  | N/A.             | <ul style="list-style-type: none"> <li>No complaints are handled by a third party.</li> </ul>   |                          |
| 5.5            | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | N/A.             | <ul style="list-style-type: none"> <li>No complaints are handled by a third party.</li> </ul>   |                          |
| 5.6            | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition." If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 9, 10 and 11) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 9, 10 and 11) of the procedure.</li> </ul>  |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 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 perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 28 (page 17) of the procedure.</li> </ul>  |                          |
| 5.9            | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This policy and procedure cover all services provided by Centrepont. This is set out in section 17 (page 9, 10 and 11) of the procedure.</li> </ul>   |                          |
| 5.10           | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure.</li> <li>Young people's individual needs are assessed and recorded on individual risk assessment. This information is stored on Inform within the young person's record. Any specific adjustments needed would be identified and actioned at this stage.</li> </ul> |                          |
| 5.11           | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure.</li> <li>The policy has been updated to ensure it complies with the requirements of section 2 of the code.</li> </ul>   |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 29 (page 18) of the procedure. All complaints are recorded on Inform, with notes and supporting documents uploaded to the individual young person's record.</li> </ul>   |                          |
| 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  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 24 (pages 15 and 16) of the procedure.</li> </ul>  |                          |



| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
|                | be provided at any stage of the complaints process without the need for escalation.   |                  |  |                          |
| 5.14           | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | Yes              | <ul style="list-style-type: none"> <li>We have two relevant policies in place that cover this area: <ul style="list-style-type: none"> <li>W16 – Behaviour Management Policy, and</li> <li>IL7 Anti-Social Behaviour and Harassment Policy.</li> </ul> </li> <li>Both policies have recently been updated and available to all staff on SharePoint.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>As above.</li> </ul>  |                          |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
| 6.1            | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in sections 16, 17 and 18 (pages 9 to 12) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (Page 9) of the procedure.</li> <li>Currently performance of this is 99% and this is monitored by the Compliance Team.</li> </ul> |                          |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (Page 9) of the procedure.</li> </ul>   |                          |



| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|---|------------------|--|--------------------------|
|                |   |                  | <ul style="list-style-type: none"> <li>92% of complaints were resolved at stage one during this period.</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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (page 10) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (page 9, 10 and 11) of the procedure.</li> </ul>  |                          |
| 6.9            | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol style="list-style-type: none"> <li>the complaint stage;</li> <li>the complaint definition;</li> <li>the decision on the complaint;</li> <li>the reasons for any decisions made;</li> <li>the details of any remedy offered to put things right;</li> </ol>                         | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and page 12) of the procedure.</li> <li>New supporting documents in place - letters have been drafted for each stage for managers to send out to complainants in response to their</li> </ul> |                          |

| Code provision | Code requirement  | Comply: Yes / No | Evidence                                  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
|                | f. details of any outstanding actions; and<br>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. |                  | complaint, a copy to be saved on YP file. |                          |

## 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 10 and 11) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 10 and 11) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. Under the current policy and procedure, young people are not required to explain their reasons for requesting a stage 2 consideration.</li> </ul>   |                          |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (page 10) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> <li>8% of complaints were resolved at stage 2 during this period.</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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 9 to 11) of the procedure.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |
| 6.18           | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and 12) of the procedure.</li> </ul>  |                          |
| 6.19           | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ol style="list-style-type: none"> <li>the complaint stage;</li> <li>the complaint definition;</li> <li>the decision on the complaint;</li> <li>the reasons for any decisions made;</li> <li>the details of any remedy offered to put things right;</li> <li>details of any outstanding actions; and</li> <li>details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol> | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 18 (pages 11 and page 12) of the procedure.</li> <li>New supporting documents in place - letters have been drafted for each stage for managers to send out to complainants in response to their complaint, a copy to be saved on YP file.</li> </ul> |                          |
| 6.20           | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 17 (pages 10 and 11) of the procedure.</li> </ul>  |                          |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|--|------------------|--|--------------------------|
| 7.1            | 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: <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> </ul> | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 24 (pages 15 and 16) of the procedure.</li> <li>New supporting documents - letters have been drafted for each stage for managers to send out to complainants in response to their complaint, a copy to be saved on YP file.</li> </ul> |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
|                | <ul style="list-style-type: none"> <li>Amending a record or adding a correction or addendum;</li> <li>Providing a financial remedy;</li> <li>Changing policies, procedures, or practices.</li> </ul> |                  | <ul style="list-style-type: none"> <li>Updated the compensation policy and the amounts we pay for loss of services like heating, water and electrics.</li> </ul>  |                          |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 24 (pages 15 and 16) of the procedure.</li> <li>Compensation policy covered in section 2 – our approach, page 4.</li> </ul> |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. This is set out in section 24 (pages 15 and 16) of the procedure.</li> </ul>   |                          |
| 7.4            | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.   | Yes              | <ul style="list-style-type: none"> <li>W13 – Complaints &amp; Feedback Policy and Procedure. Centrepoin’s policy and procure has been updated to ensure it complies with the current code.</li> </ul>   |                          |

## Section 8: Self-assessment, reporting and compliance

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord’s performance from the Ombudsman; and</li> </ol> | Yes              | <ul style="list-style-type: none"> <li>Centrepoin produces an annual complaints report, and this is made available to everyone in the “Reports” section of Centrepoin’s website <a href="#">Our finances, reports and policies   Centrepoin</a>.</li> </ul> |                          |

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|---|------------------|---|--------------------------|
|                | f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.  |                  |   |                          |
| 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              | <ul style="list-style-type: none"> <li>The 2023/2024 Annual Complaints Report was presented to Audit and Risk Committee in October 2024. The 2024/2025 Annual Complaints Report will be presented to Centrepoint's Bord in June 2025.</li> <li>Centrepoint produces an annual complaints report, and this is made available to everyone in the "Reports" section of Centrepoint's website <a href="#">Our finances, reports and policies   Centrepoint</a>.</li> </ul>                      |                          |
| 8.3            | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes              | <ul style="list-style-type: none"> <li>No restructure, merger or change in procedures has taken place and therefore only the annual self-assessment has been completed this year.</li> </ul>  |                          |
| 8.4            | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes              | <ul style="list-style-type: none"> <li>Centrepoint's Complaints Officer is responsible for liaising with the Ombudsmen and will ensure a review and any updates are made to the self-assessment following an Ombudsmen investigation.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>DP1 Data Protection Policy and Procedure is in place and updated annually.</li> <li>DP5 Data Breach Procedure is in place.</li> <li>The Complaints Officer is responsible for liaising with the Ombudsmen and would ensure the Ombudsmen is contacted as required. The Compliance Team and IT Team would ensure any data breaches or cyber incidents were managed in accordance with Centrepoint's Data Protection Policy and Procedures.</li> </ul> |                          |

| Code provision | Code requirement | Comply: Yes / No | Evidence   | Commentary / explanation |
|----------------|------------------|------------------|--|--------------------------|
|                |                  |                  | <ul style="list-style-type: none"> <li>Appropriate notifications would be sent to any individual effected by such incidents by the Data Protection Officer.</li> </ul> |                          |

### 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              | <ul style="list-style-type: none"> <li>W13 Complaints and Feedback Policy and Procedure. This is set out in section 31 (page 18) of the procedure.</li> <li>All complaint records include a lessons learned section and data captured from this is included in the annual complaints report.</li> </ul>   |                          |
| 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              | <ul style="list-style-type: none"> <li>W13 Complaints and Feedback Policy and Procedure. This is set out in section 31 (page 18) of the procedure.</li> <li>Annual Complaints Report identify areas of learning from complaints and how these feed into Centrepoint's continuous improvement of service delivery.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>Annual Report for Tenants 24-25. This report is produced annually and is made available to all young people in Centrepoint accommodation services. It is also available on Centrepoint's website.</li> <li>Annual Practice Review presented to ARC.</li> <li>Centrepoint produces an annual complaints report, and this is made available to everyone in the "Reports" section of Centrepoint's website <a href="#">Our finances, reports and policies   Centrepoint</a>.</li> </ul> |                          |
| 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   | Yes              | <ul style="list-style-type: none"> <li>Centrepoint's Complaints Officer has day to day responsible for leading on complaints handling and reports</li> </ul>  |                          |

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
|                | issues, serious risks, or policies and procedures that require revision.   |                  | <ul style="list-style-type: none"> <li>complaints handling performance to Audit and Risk Committee.</li> <li>W13 Complaints and Feedback Policy and Procedure, section 5.2 (page 3) of the procedure sets out the responsibilities of the Complaints officer.</li> </ul>  |                          |
| 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              | <ul style="list-style-type: none"> <li>Centrepont has a designated MRC who has responsibility for complaints at board level.</li> <li>W13 Complaints and Feedback Policy and Procedure, section 5.3 (page 3) of the procedure sets out the responsibilities of the MRC.</li> </ul>  |                          |
| 9.6            | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.   | Yes              | <ul style="list-style-type: none"> <li>Regular meetings are now in place between the MRC, Centrepont's Complaints Officer, and Head of Governance to review complaints data and performance.</li> </ul>   |                          |
| 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 maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul> | Yes              | <ul style="list-style-type: none"> <li>Regular meetings are now in place between the MRC, Centrepont's Complaints Officer, and Head of Governance to review complaints data and performance.</li> </ul>   |                          |
| 9.8            | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> </ul>   | Yes              | <ul style="list-style-type: none"> <li>The Complaints Officer, reporting to ARC reports all relevant information relating to complaints handling as part of the compliance report. The Complaints Officer also answers any queries raised by members of ARC.</li> <li>Centrepont's standard objective is to have 90% of all complaints resolved satisfactorily within the agreed</li> </ul> |                          |



| <b>Code provision</b> | <b>Code requirement</b>   | <b>Comply: Yes / No</b> | <b>Evidence</b>   | <b>Commentary / explanation</b> |
|-----------------------|---|-------------------------|---|---------------------------------|
|                       | c. act within the professional standards for engaging with complaints as set by any relevant professional body. |                         | timescales set out in W13 Complaints and Feedback Policy and Procedure. |                                 |