



Annual Complaints Performance

Self assessment June 2024.

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Populo Living owns and manages 795 properties in Newham, a combination of social housing & private rented properties (PRS).

251 properties are managed by Populo Homes who manage social housing; with Populo Living managing PRS.

***Key Metrics Summary July 2023** – These figures will be updated in full when the 2024 report is completed and published by our partner ACUITY at the end of July 2024.

FOREWORD

- 1.1. The purpose of this Report is to appraise our Compliance with the Complaints Handling Code and give an overview of our Complaint Handling Performance.
- 2 **Summary:**
 - 2.1. The Complaint Handling Code (CHC) became statutory on 1 April 2024 for Populo Homes, and we have a statutory requirement to comply. The Housing Ombudsman's will monitor compliance, supported by additional intervention powers, where it finds that RPs are not complying with its requirements.
 - 2.2. The CHC aims to promote best practice in complaint handling and in doing so, result in a better service to residents. Whilst the Code only applies to Registered Providers, we will be applying the Code requirements across all Populo homes and services, both PL (Populo Living) and PH (Populo Homes).
 - 2.3. As part of Compliance with the CHC, we are required to complete an annual self-assessment on how we meet the requirements.

3 Summary of our performance for 2023/24

Housing Ombudsman’s Referrals and Determinations

- 3.1 We had one case referred to the Housing Ombudsman (HO) in June 2023, which related to two issues raised by the same household– a water pump vibration noise affecting the customer’s quiet enjoyment of their should be and a second issue relating to a service charge applied to the same property. The latter issue was resolved, with Populo Homes accepting that the service charge was not correctly applied, and offering compensation of £400 which was accepted by the tenant.
- 3.2 The noise issue is still with the HO, although we remain confident that we have done all we could have done, within appropriate timelines. The noise issue related to a water pump installed within the communal roof of the block which was affecting the customer’s sleep at night. The pump noise levels were recorded as being within acceptable recommended levels. However, we took a range of mitigation actions to address the customer’s concerns, including replacing the new pump twice, and adding insulation jackets to the pump, all of which failed to satisfactorily resolve the issue for the customer. In the end, we turned the pump off, as water pressures appeared to have improved in the block from Thames Water.
- 3.3 We have not received any reports or similar from the HO relating to determinations.

3 Complaints Performance Analysis

- 3.4 During this period, we received thirty two complaints for both PH and PL: 12 of which were made against PH.

- Twenty have been resolved at Stage 1, and 12 at Stage 2 ; 1 with the HO
- 100% of these complaints were acknowledged within our KPI of 5 working days.
- 80% of cases were resolved within the required response time. The three remaining cases delayed response times were due to changes in the management team, although residents were kept updated during the resolution period.

3.5 Complaint route cause categories identified as:

	Time taken to repair	Communication	Financial errors	Energy Costs	Service request
PH	6	2	2	1	1
Referral to HO	0	0	0	0	1
PL	5	5	0	2	8

- 3.6 We have not rejected any complaints made to PH about any service shortcoming.

4 Learning outcomes and improvement actions

- 4.1 **Lessons** have, and **are being learned** within the team on more effective communication with customers, as outlined elsewhere on service improvements. Some communication issues are a consequence of the newness of the team and precise definition of responsibilities and processes. This has now been resolved, with cross team buy-in for an overall team approach to customer responsiveness. We have also revisited how phones are looped within the team.

- 4.2 **Better information guides** are been developed to assist customer awareness of key service responses, as is planned within the Customer Service Offer described elsewhere. Issues around repairs and responsibilities have been a key source of call demand into the CS Team, and potential service dissatisfaction. This is clarified in the draft Guide at Appendix 2. This will be published on our website and be sent out to all residents, and an integral part of the Tenancy sign up process.
- 4.3 **Repair Responsiveness** – As outlined in the last Maintenance update generally we offer a very responsive service. That said, there are areas where due to defects address, or parts supply issues, this will take longer than normal. We are conducting an audit of some of our recent repairs to ensure that response times are consistent with the data being reported, as there are a range of contractor behaviours that may mask performance.
- 4.4 **Arrears reconciliation** has also been improved by better training and understanding of Yardi’s functionality. There is more work to be done, as there are still issues that require greater clarity and training on rents and service costs, and how they are best captured in Yardi.
- 4.5 **Energy costs** complaints relate to costs at the Group Cheviot project where we have scheduled a meeting with the scheme energy supplier to seek to renegotiate the existing contract. We have also invited one of the complainants to become involved in the future procurement of energy for the scheme.
- 4.6 We are scheduling a series of **Customer Service Training** courses on Complaints Handling and general customer service issues for all the

CS team. This will be conducted by an external party, who has an exemplary track record in the RP and real estate sectors, for customer service training and coaching. The Head of Customer Services, PRS, has also recently attended a Housing Ombudsman workshop on the Complaints Handling Code.

- 4.7 **Updating of Website** – there is a range of work ongoing to update customer information on performance, policies, and processes on our website. This is ongoing and the team are working with the Communications team to get in place over the next 8 weeks.
- 4.8 **Sharing our customer feedback** to collaborate over solutions and improvements:

We have a complaints review meeting every 2 weeks and share the learning outcomes from these meetings to facilitate improvements and increase awareness across the organisation over what matters to customers, where we are getting this wrong and how we can collaborate more to increase resolution time frames and prevent patterns forming in the complaints we are receiving. We are also working on utilizing the RentCafe App to provide instant feedback on service to enhance responsiveness and insight.

As offered elsewhere, we are also conducting a Customer Satisfaction Survey with all tenants. The outcomes of this will enable us to contrast our Complaints performance with peers, as our Survey Company (Acuity) act in the same capacity for other RPs with under 1,000 homes. The report should be available from late July, and we will update the document and our website with the outcome of the latest Survey.

5 Improving reporting of Complaints

- 5.0 How we capture and report our complaints needs some more detailed work, for learning and communication, and to better align with how the sector, and the HO will categorise performance, so we can better contrast peer performance levels. The format of reports published by the HO are a good starting template for development of our own format.
- 5.1 We also need to align with our Balanced Score Card template to better inform our Board of progress with resident complaints. A new template is being produced imminently.

KEY METRICS SUMMARY 2023*

63% overall satisfaction

A little under two-thirds of residents (63%) are satisfied with the overall services provided by Populo Homes. This is one of the higher rated measures in the survey, the highest being the provision of a safe home (76%), treating residents fairly and with respect (65%) and 63% are satisfied with the positive contribution made by Populo Homes to the neighbourhood.

However, fewer than half the tenants are satisfied with the time to complete repairs (49%), how tenants' views are listened to and acted upon (47%) and just 38% are satisfied with the way complaints are handled.



61% Well maintained home



76% Safe home



53% Repairs in the last 12 months



49% Time taken - last repair



53% Communal areas clean & well maintained



63% Positive contribution to neighbourhood



61% Anti social behaviour



54% Easy to deal with



47% Listens and acts



57% Keeps you informed



65% Treats fairly & with respect



38% Complaints handling

*Key Metrics Summary July 2023 – These figures will be updated in full when the 2024 report is completed and published by our partner ACUITY at the end of July 2024.

KEY METRICS SUMMARY 2023*

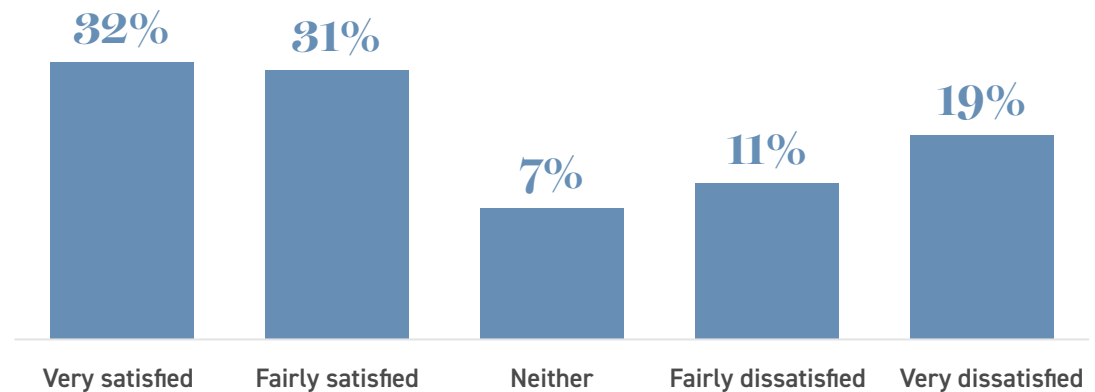
Overall satisfaction

Residents were asked, “Taking everything into account, how satisfied or dissatisfied are you with the service provided by Populo?” This is the key metric in any resident perception survey.

Just under two-thirds of residents (63%) are satisfied, with slightly more very satisfied (32%) than fairly satisfied (31%). However, 31% of residents are dissatisfied with the overall services provided and a further 7% are neither satisfied nor dissatisfied.

As expected, the LCRA tenants are more satisfied than the LCHO residents, 66% compared with just 29%. However, it should be noted that only 7 LCHO residents responded to this question compared with 65 of the LCRA tenants.

In terms of the area of operation, more in Didsbury Road are satisfied with the overall services than the other areas, particularly in Fireman’s Reach with just 20%.



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KEY METRICS SUMMARY 2023*

Keeping Properties in Good Repair

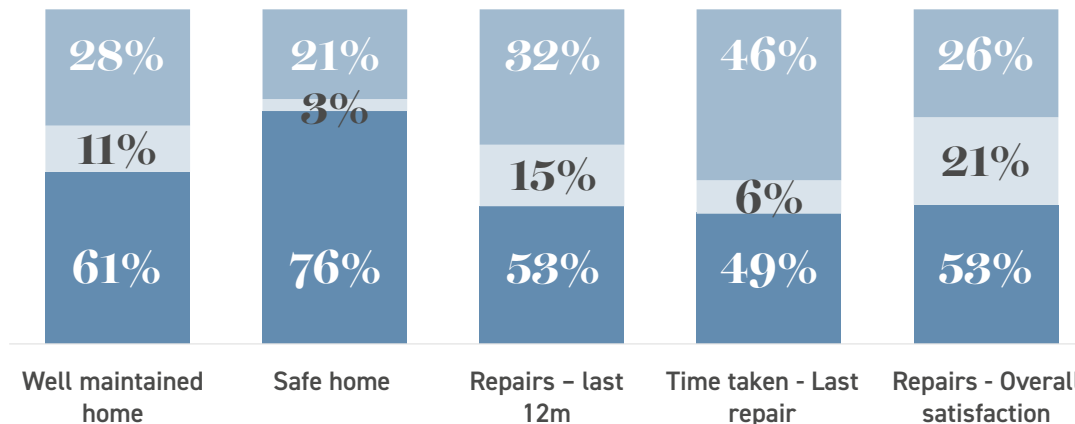
Six out of ten residents (61%) are satisfied that Populo Homes provides them with a well-maintained home, although 28% are dissatisfied.

However, considerably more (76%) are satisfied with their home's safety, although still a fifth are dissatisfied.

Satisfaction with the repairs service is lower, 53% being satisfied with the overall repairs and maintenance service and the same number satisfied with the service in the last 12 months; 26% and 32% respectively being dissatisfied with the service.

Just under half the residents (49%) are satisfied with the time to complete their most recent repair, with almost as many dissatisfied (46%).

Most of these measures don't apply to LCHO residents, who receive a different level of repairs service to the LCRA residents, but just 29% are satisfied with the safety of their home compared with 81%. But this is based on just seven LCHO responses.



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SELF-ASSESSMENT FORM

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy Complaints Procedure	Populo Homes has a complaints policy fully in line with the Complaint Handling Code 2024, and this defines complaints for residents and staff. While Populo does not employ a dedicated complaints officer, for the purposes of the code the Customer Services Team oversees and monitors the handling of complaints and is representative of this post. The team are experienced in complaint handling and a senior manager has attended a recent webinar where the recent policy amendments were further communicated.
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 Policy and Procedure Complaints, Compliments and Suggestions Form	<p>Our Populo Homes 'We are here to listen' provides residents to make a complaint should they feel dissatisfied with a service that we have provided.</p> <p>Our Complaints Policy states that a comment doesn't have to be stated as a complaint in order for it to be treated.</p> <p>Our Complaints Handling Policy states that tenants are able to make complaints via a third-party representative or advocate, such as a family member, where sufficient permission by the resident has been provided, and the method in which the resident can make a complaint through this method.</p> <p>If a third party does make a complaint on behalf of a resident, we will ensure that the complaint is tracked as a third-party complaint on our Complaints Tracker. To date, we have never received any third party complaints.</p> <p>The Compliments, and Suggestions Forms are also contained with the Home User Guides that are provided to the tenants upon moving into the property.</p>

Section 1: Definition of a complaint (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure	<p>When we are clear this is not a service request, this is captured in policy and progressed by our team accordingly. We have guidance in our complaints management supporting documents to help the team assess this and the management team are also clear on what the differences are to support further clarification sought from the team.</p> <p>Our Complaints Policy provides a definition and details of a service requests, and how it does not constitute as a complaint, and provides an explanation, for the residents review as to the difference between a complaint and a service request. Should the comment constitute a service request, we have signposted within our policy as to how the resident can make a service request.</p> <p>We can confirm that any service requests are recorded, monitored and reviewed regularly by using our YARDI system, with information stored by, and monitored by our Property Managers, and where relevant, Building Safety and Compliance Manager.</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy and Procedure	This is captured within our Complaints Policy under 'What the policy doesn't cover'.

Section 1: Definition of a complaint (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure Complaint or service request assessment document.	<p>Captured in our policy. Monitored by the Head of PRS and Customer Service to check these responses and assign any feedback that needs an opportunity to raise a complaint with the respondent to the team to progress.</p> <p>Our subcontractors, Chigwell, submit surveys to residents following the provision of a repair, which contains information about how the resident can make a complaint should they remain dissatisfied with the services provided.</p> <p>When submitting our Tenant Satisfaction Measures (TSMs), we further ensured that surveys contained information about how to make complaints, should a resident feel dissatisfied with our service provision.</p> <p>We will be ensuring that going forward, quarterly surveys will be distributed to residents regarding the quality of the provision of services, which will also contain information on how to make a formal complaint should the need arise.</p>

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 Policy	Captured in our policy. Decision to not accept a complaint will be escalated to and made by the Head of Housing and Customer Services, and in their absence, the Director of Customer Services.
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: <ul style="list-style-type: none"> ■ The issue giving rise to the complaint occurred over twelve months ago. ■ Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. ■ Matters that have previously been considered under the Complaints Policy. 	Yes	Complaints Policy Complaint or service request assessment document	<p>Captured in our policy. We have used the suggested examples, and a determination would be given by the Head of Housing and Customer Services after further discussion with the team and customer.</p> <p>The Complaints Policy details the criteria as to what matters will not be considered as a complaint, and details the grounds for not escalating a matter to a stage 2 complaint investigation and resolution.</p>
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 Policy	Captured in our Complaints Policy where it states 'Issues which are over 12 months old unless there are exceptional circumstances to review the complaint beyond this time frame, which may include where the complainant was too ill to make a complaint within the time frame, not addressing the complaint would lead to immediate threat or actual harm to the customer, or an ASB case has not been handled in accordance with our ASB Policy etc Populo retains the right to apply discretion to accept complaints outside the time limit where there are good reason to do so.

Section 2: Exclusions (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy Complaint or service request assessment document.	Complaints Policy details that where we don't accept, we will provide an explanation if we don't accept a complaint, and inform the resident that they can bring the complaint to the Housing Ombudsman for review.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy	Captured in our policy. This is captured in our Complaints Policy clause 3, which details that each complaint will be dealt with on a case-by-case basis and assessed of the particular merits of the matter to determine whether the item constitutes as a sufficient complaint.

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 Policy and Procedure	Captured in our policy. Residents can email, call or visit our offices. They can also request a meeting at their home to raise a complaint. We will continue to explore ways to enhance accessibility, and inclusion for all residents.
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 Policy Complaints Procedure Complaints Monitoring and Learning Group Terms of Reference	As above and captured in our policy. We continue to engage our third parties to remind them of our policy and will be introducing stakeholder meetings every quarter this financial year. We have added this as agenda item during these meetings to remain consistent on this requirement. We also maintain a Complaints Monitoring and Learning Group where relevant staff are invited and constantly updated by any policy updates or reminders.
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 Policy and Procedure Captured in Annual report for 2024	Covered in our policy. We continue to work on evolving a culture where complaints are embraced as important feedback. The Customer Services Director will be working with the Executive Team this financial year to progress further how we manage complaints feedback, and share learning across the organisation, as complaints are not just the remit of the Customer Services Directorate We are grateful that we have received honest feedback from our residents through the tenant satisfaction measures, and are looking to implement changes within our complaints handling process to ensure better communication and improved complaint management services for our residents.

Section 3: Accessibility and Awareness (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 time frames for responding. The policy must also be published on the landlord's website.	Yes	Complaints Policy and Procedure Captured in Annual report for 2024	Captured in our policy and a condensed diagram. This year we will be reviewing our customer profile to ensure our Complaints Policy is accessible and clear for all customer groups- appreciating the diverse ethnic make-up of Newham A copy of Complaints Policy is also part of the tenancy starter packs so residents are aware of our complaints process from the start of their tenancies.
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 Policy and Procedure	Captured in our policy The Policy details that our Complaints Policy will be accessible on our website and published where possible, in leaflets, newsletters, and other correspondence with our customers. We have also noted that we will offer copies of our policy in translated versions where necessary to customers where English is not their first language. Information about how residents can contact the Housing Ombudsman is also available on our website.
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	Complaints Policy and Procedure	This is captured in our policy under third party representation.
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 Policy and Procedure Complaints and Suggestions PDF found on Populo Website. Populo Homes Complaints and Suggestions Form: https://www.populoliving.co.uk/media/55gh52lv/populo-homes-complaints-and-suggestions.pdf	Captured in our policy and on our website under the Populo Homes Complaint and Suggestions Form.

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	Complaints Policy and Procedure	<p>Our Customer Services Team are responsible for handling customer complaints. Our policy states that stage 1 complaints will be assessed and managed by our customer services administration team, especially housing officers and property managers, who act as the designated 'complaints officer'. Under stage 2, the complaint will be transferred to a senior manager who was not related to the initial complaint proceedings under stage 1.</p> <p>Any complaints are do arise are duly reported to our Populo Homes Board in our customer services reports on a bi-monthly basis at each Board, in which the Board can may review and discuss the complaint where necessary.</p>
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	Complaints Policy and Procedure Captured in Annual report for 2024 Compensation Policy	<p>The organisation supports this Code requirement, and the senior leadership team are engaged in providing support when this is needed by the Head of PRS and Customer Services.</p> <p>We have noted within our policy that the relevant complaints officer will have the relevant authority and resources to undertake appropriate dispute resolution, and line with any other relevant compensation policy. Populo must ensure that resources and authority offered to its complaint's officers are proportionate to the level of complexity of the complaint.</p>
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 Policy and Procedure Captured in Annual report for 2024 Meeting minutes Complaints tracker contains service improvement area which is reviewed monthly.	<p>Group, and any further items concerning the Code and learning from our complaints are fed into additional coaching sessions for individuals or as a team as necessary. Resource is regularly reviewed to check we can prioritise complaints as per the Code requirements. (cont...)</p>

Section 4: Complaint Handling Staff (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.3 (cont...)			Complaints Monitoring and Learning Group Terms of Reference	<p>Our complaints tracker contains a section which discusses the outcomes of the complaint, in addition to the learning and improvement analysis that should be taken forward to improving our complaints culture going forward. This is reviewed in our Complaints Monitoring and Learning Group meetings.</p> <p>An example of training includes reviewing previous complaints and how it was handled, and detailing best practice in how to appropriately deal with the complaint in accordance with our policies, best practice, and newly developed laws.</p>

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 Policy and Procedure	We only have one policy.
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 Policy and Procedure	We now have 2 clearly defined complaint stages, having reduced this from 3 stages following the recent Code amendments.

Section 5: The Complaint Handling Process (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure	As above in 5.2
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints Policy and Procedure	<p>We progress most complaints directly, not using third parties. The only exception maybe for leaseholders where a building warranty company is involved. However, we would ensure the complaint still only went through 2 stages</p> <p>All of our contractors are aware that should a complaint arise regarding a service that they have provided, that the complaint should be referred directly to Populo, in which the complaint will then proceed with the 2 stage complaints process. This information is contained within our policy.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes.	Complaints Policy and Procedure	<p>Upon the procurement of any third party providers, Populo ensures that we have undertaken relevant due diligence on the companies relevant policies, to ensure that they are in line with proper legislation and best practice. In the case of complaints management, Populo ensures that the third-party contractors are provided with a copy of the compliant Complaints Policy, and in turn, contractual processes are included to ensure that the third party contractually compliance with the following of our complaints policies.</p> <p>Quarterly meetings are held between ourselves and third parties, in which discussion regarding performance management, and where rarely but necessary conversations are held over our Complaints Procedures/Policy.</p>

Section 5: The Complaint Handling Process (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure Complaint Stage 1/2 Acknowledgement Temp	Covered in policy and templates we use to communicate with residents concerning complaints. This information is also part of our stage 1/2 acknowledgement templates to ensure that we have understood the complaint being made by the resident.
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 Policy and Procedure Complaints Response Template Stage 1 and Stage 2, and Complaints Acknowledgement Stage 1 and Stage 2 Template	Covered in our policy. Within our stage 1 and stage 2 complaint responses, we have also provided guidance to those making the response to ensure that they detail to the resident on which aspects of the complaints we are responsible for, and not responsible.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Complaints Policy and Procedure Conflicts of Interest Policy	Coaching is provided to check this and Head of Service will also challenge this when reviewing each response. Our policy makes a statement that we will abide by this section of the Code. Prior to the allocation of any complaint, any potential or actual conflict of interest is assessed, in accordance with our conflict-of-interest policy, to ensure no potential or actual conflict can have a detrimental impact upon the delivery/ outcome of the complaint.
5.9	Where a response to a complaint will fall outside the time-scales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy and Procedure	Covered in our policy.

Section 5: The Complaint Handling Process (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure Household Updates Form Nominations Form Sign Up Check List – Telephone Interviews	<p>Checked by customer Services team when complaint is received and then by Head of Services as response are issued.</p> <p>Our customer services team undertake home visits of each property and bring with them a household details form, which includes asking questions about the residents, including whether they have any protective characteristics. Records of these protective characteristics are then input onto our internal database YARDI. A copy of household updates form is also provided to the resident at the start of their tenancy.</p> <p>Our procedure noted that staff must also identify any vulnerabilities or needs relevant to resolving the complaint and make any necessary reasonable adjustments.'</p> <p>Given the nature of our relationship with Newham Council, Newham Council will be responsible for sharing any pertinent information regarding reasonable adjustments in any nominations form. We will store this information within our YARDI system, allowing all those staff working with that resident to be aware of what reasonable adjustments are needed, or should be exercised.</p> <p>When tenants first move in our customer services team also undertake a sign up check list which provides the tenant the opportunity to disclose any reasonable adjustments that they might need when staying/looking for a property.</p>

Section 5: The Complaint Handling Process (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure Complaints Stage 2 Response Template	<p>Covered in policy.</p> <p>All responses to complaints at stage one provides an explanation as of the complainant's complaint, their expectations and the actions that we have taken in order to rectify/address the complaint. Should there be valid reasons to not escalate the complaint to a stage 2 complaint, the landlord will clearly state in its acknowledgment of the complaint detailing the reasons why the complaint will not be accepted in accordance with our Complaints Policy.</p>
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	Complaints Procedure Complaints Tracker	<p>A complaints log is kept, and all corresponding communications, and relevant reports and documentation relating to the case, are held in a central database as well as being logged against each customer case in our Yardi system.</p> <p>All complaints are assigned a complaints number, with all documents saved against that complaints number to ensure that staff are able to seamlessly access and identify relevant documentation to ensure continuation of services in investigating the complaint.</p>
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 Policy and Procedure	<p>Covered in policy. All reasonable efforts are exhausted to prevent further escalation for the resident while keeping the process overall to 2 clear stages.</p> <p>The decision for providing appropriate remedies are all made in accordance with Populo's Compensation Policy.</p> <p>Potential remedies are also listed in our policy to ensure that the resident are aware of the type of remedies that are available to them should they wish to make a complaint.</p>

Section 5: The Complaint Handling Process (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	Complaints Policy and Procedure	<p>This is contained within our Complaints Policy.</p> <p>Should a restriction be placed on the communication of a resident, this will be stored in our YARDI system, and reviewed periodically throughout the complaints stages.</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Complaints Policy and Procedure Populo Living Group Equality, Diversity and Inclusion Policy	<p>We have noted within our Complaints Policy, and EDI Policy, that the treatment of residents, and any restrictions placed upon them, shall be proportionate and demonstrated regard to the EA 2010.</p> <p>Our procedure further details how a member of staff can determine what constitutes as a proportionate response/ restriction to unacceptable behaviour.</p>

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	Complaints Policy and Procedure	Covered in our policy and monitored by Head of Services, through bi-weekly meetings. We have a process for allocating priority, and methods of expediting complaints resolution noted within our Complaints Procedure.
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 Policy and Procedure Reported in our tracker	Covered in our policy and monitored by Head of Services. Our Complaints Policy states that we aim to acknowledge, log and allocate a complaint to the relevant service area for investigation within 3 working days of receiving the complaint.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes.	Complaints Policy and Procedure Reported in our tracker and reviewed in monthly complaints meetings	Covered in our policy and monitored by the Head of Housing and Customer Services. This is noted within our Complaints Policy. Evidence of providing full response, unless good reason to not meet the deadline, is also evidence in our complaint's tracker.
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	Complaints Policy and Procedure Reported in our tracker and reviewed in monthly complaints meetings. Complaints Tracker	Covered in our policy and monitored by Head of Housing and Customer Services. We also track the delay and reasons for the delay in our Complaints Tracker, to ensure appropriate monitoring.

Section 6: Complaints Stages – Stage 1 (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure Complaints Templates	Covered in our policy and complaints templates, and monitored by Head of Housing and Customer Services.
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 Policy and Procedure Stage 1 and Stage 2 Complaints Response Templates Complaints Tracker	Covered in our policy and complaints templates. We also track outstanding actions on our Complaints Tracker which will detail the outstanding action, when the action should be completed, and when updates should be provided to complainants.
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 Policy and Procedure Complaints Response Template Stage 1 and Stage 2	Covered in our policy and complaints templates responses, and monitored by Head of Housing and Customer Services.
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 Policy and Procedure	Covered in our policy. Our procedure states that 'if additional complaints are raised during this investigation of a complaint, we will aim to incorporate these into the stage 1 response, unless we consider it will unreasonably delay the response to the initiate complaint, in which case a new complaint will be logged'. This is also included within our policy.

Section 6: Complaints Stages – Stage 1 (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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 Policy and Procedure Stage 1 Response Complaints Templates	Covered in our policy and Complaints Stage 1 Response templates , and monitored by the Head of Housing and Customer Services.
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 Policy and Procedure Tracker	Covered in our policy and tracker adapted to capture the escalation
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	Complaints Policy and Procedure Tracker Stage 2 Complaint Acknowledgement Letter Template	Covered in our policy and tracker adapted to capture the escalation.

Section 6: Complaints Stages – Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure Stage 1 Closure Letters Template	Covered in our policy. After 5 days of sending the Stage 1 Complaints Response, we send out a copy of the closure letter/email which provides an opportunity for the resident to highlight whether they are satisfied with the complaint response
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 Policy and Procedure Tracker	Covered in our policy.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints Policy and Procedure Tracker	Covered in our policy.
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	Complaints Policy and Procedure	Covered in our policy.
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 Policy and Procedure	Covered in our policy.
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 Policy and Procedure Tracker	Covered in our policy and tracked on our complaints tracker.

Section 6: Complaints Stages – Stage 2 (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure	Covered in our policy. This is also covered in our Stage 2 Complaints Response Template.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Complaints Policy and Procedure Stage 2 Complaint Response Template	Covered in our policy and also detailed within our stage 2 Complaints Response Template
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 Policy and Procedure	Covered in our Complaints Policy.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> ■ Apologising; ■ Acknowledging where things have gone wrong; ■ Providing an explanation, assistance or reasons; ■ Taking action if there has been delay; ■ Reconsidering or changing a decision; ■ Amending a record or adding a correction or addendum; ■ Providing a financial remedy; ■ Changing policies, procedures or practices. 	Yes	Complaints Policy and Procedure Templates	Covered in our policy and our procedure. This is also noted in our Stage 1/2 Complaints Responses
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy and Procedure	<p>Covered in our policy and we are in the process of developing a Compensation policy to help us be consistent with our approach to considering the financial impact to a resident.</p> <p>This is also covered in our Complaint Stage 1/2 Response Templates.</p>
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 Policy and Procedure	<p>Covered in our policy. We also provide an explanation in our Complaints Stage 1/2 Responses on what will happen and by when, in agreement with the resident.</p> <p>Any remedy proposed will be tracked and monitored by our Complaints Tracker.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy and Procedure	Guidance is captured in our policy and the quality of the management of this policy monitored by the Head of Housing and Customer Services.

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"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; any findings of non-compliance with this Code by the Ombudsman; the service improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Complaints Policy and Procedure Reports Annual Complaints and Service Improvement Report April 2024</p>	<p>Reports and a complaints log has been generated to capture this Code requirement. The 2023/24 report is submitted to the June 2024 Board, and we will be sharing regular reports to the executive team, and to Boards quarterly, going forward.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes	<p>Complaints policy and procedure Reports Annual Complaints and Service Improvement Report</p>	<p>We have submitted a copy of our annual complaints performance and service improvement report to our Board, and have uploaded the report onto the complaints part of the website.</p>

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes.	Complaints Policy and Procedure	<p>We are mindful that during such a possibility, resources must remain in place to preserve the delivery of our policy to our residents.</p> <p>We have not experienced any restructure, merger and/or change in procedures to warrant the creation of a new self-assessment.</p>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes.	Complaints Policy and Procedure	This would be completed where such an investigation had taken place. We have not been asked to review and update the self-assessment to date as a result of an Ombudsman investigation.
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 Policy and Procedure	This would be communicated to the Ombudsman.

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 Policy and Procedure Complaints Tracker Customer Services Reports submitted to the Board Complaints Monitoring and Learning Group Terms of Reference	This is managed by the Head of Housing and Customer Services in the ongoing reviews that take place each month. Complaints Policy notes that we will 'pro-actively assess and analyse complaints to identify trends, causes, or systemic issues to learn and make improvements to our services, policies, and procedures'.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes.	Complaints Policy and Procedure Annual Complaints and Service Improvement Report April 2024 Complaints Monitoring and Learning Group Terms of Reference	This is happening to learn and improve our services, as part of our continuous improvement plans. We undertake frequent Complaints Monitoring and Learning Group in which we discuss learnings from best practice complaints handling, and review where complaints had not gone so well, so we can improve our complaints handling culture going forward.
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 Policy and Procedure Annual Complaints and Service Improvement Report April 2024 Tracker Meeting minutes Populo Homes Board papers	Our newly created reports will capture this and any necessary workshops that we need to develop and share ideas will be encouraged. All complaints are also reported to our relevant Populo Homes (governing board) on a bi-monthly basis, with any wider learning reported and discussed with the PH Board.
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 Policy and Procedure	Populo Homes can also confirm that Pam Bhamra, Chair of the Populo Homes Board, is now acting as the Populo Homes Member Responsible for Complaints, who will be responsible for ensuring the governing body receives regular information on complaints, providing insight into the landlord's complaint handling performance, and to hold account the Director of Customer Services, and Head of Housing and Customers Services, in assessing any themes or trends to identify potential systemic issues, serious risks, or policy/procedure revision.

Section 9: Scrutiny & oversight: continuous learning and improvement (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure Annual Complaints and Service Improvement review April 2024	See answer for Code response 9.5.
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.	Complaints Policy and Procedure Annual Complaints and Service Improvement review April 2024 Populo Homes Board Report and Minutes dated June 2024.	Information is kept visible and available centrally on our internal system, and reports can be requested at any time for the MRC to assist the role. Reports are provided to the MRC prior to Populo Homes Board meetings for review to assess the landlord's performance and determine whether certain actions and discussions are necessary for discussion at the PH Board.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes.	Complaints Policy and Procedure	The frequency is to be agreed and likely to be captured in the Board quarterly.

Section 9: Scrutiny & oversight: continuous learning and improvement (cont...)

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes.	Complaints Policy and Procedure Reports	<p>We have KPIs to track our performance and to capture learning. We will be borrowing from the Housing Ombudsmans data performance sets to contrast our performance, and ensuring that all team members own and learn from service shortcomings. Additional training for staff is scheduled, and key staff are already attending the HO workshops on Complaints handling.</p>



Annual Complaints Performance.

Self assessment June 2024.

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