

Refuge's Freephone 24 Hour
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Appendix A: Refuge's 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: <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	Refuge's Complaints Policy Section 2. What is a complaint?	A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Refuge, its own staff, or those acting on its behalf, affecting a service user or group of service users
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	Refuge's Complaints Policy Section 4. Who can make a complaint?	Any person accessing Refuge's services who expresses dissatisfaction will be given the choice to make a complaint, they do not need to use the word "complaint" for it to be treated as such. A complaint that is submitted via a third party or representative will be handled in line with Refuge's complaints policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put	Yes	Refuge's Complaints Policy Section 3. What will not be treated as a complaint?	The following will not be treated as complaints under Refuge's complaints policy: Request from a service user to Refuge requiring action to

	something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			be taken to put something right e.g. reporting a repair or raising a concern about another resident in a refuge, unless the service user expresses dissatisfaction with how the service request has been handled.
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	Refuge's Complaints Policy Section 3. What will not be treated as a complaint?	Request from a service user to Refuge requiring action to be taken to put something right e.g. reporting a repair or raising a concern about another resident in a refuge, unless the service user expresses dissatisfaction with how the service request has been handled. The process for resolving service requests is separate from the complaints process and submitting a complaint regarding the handling of a service request will not delay the service request being resolved.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though		Refuge's Complaints Policy Section 3. What will not be treated as a complaint?	An expression of dissatisfaction with services made through a survey,

	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.			focus group or similar process is not defined as a complaint, though wherever possible, the person providing the feedback should be made aware of how they can pursue a complaint if they wish to
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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		Refuge's Complaints Policy Sections: 2. What is a complaint? 3. What will not be treated as a complaint?	Sections 2 and 3 clearly explain what is and is not a complaint. The exclusions to the complaints policy are made clear in section 3. Section 3 states: "Refuge does not take a blanket approach to excluding complaints and the individual circumstances of each complaint must be considered."
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 	2.2	Refuge's Complaints Policy 3. What will not be treated as a complaint?	The following will not be treated as complaints under Refuge's complaints policy: <ul style="list-style-type: none"> • Request from a service user to Refuge requiring action to be taken to put something right e.g. reporting a repair or raising a concern about another resident in a

	<p>is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none">• Matters that have previously been considered under the complaints policy.			<p>refuge, unless the service user expresses dissatisfaction with how the service request has been handled.</p> <ul style="list-style-type: none">• A complaint relating to an issue that occurred over twelve months ago where the service user has been aware of the issue for over 12-months.• Where 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.• An expression of dissatisfaction with services made through a survey, focus group or similar process is not defined as a complaint, though wherever possible, the person providing the feedback
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				should be made aware of how they can pursue a complaint if they wish to
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	Refuge's Complaints Policy Sections: 2. What is a complaint? 3. What will not be treated as a complaint?	<p>The policy states that a complaint may not be accepted on the following basis:</p> <p>“A complaint relating to an issue that occurred over twelve months ago and the service user has been aware of the issue for over 12-months.”</p> <p>But also states:</p> <p>“Refuge does not take a blanket approach to excluding complaints and the individual circumstances of each complaint must be considered.”</p> <p>If there were legitimate reasons for a delay in a complaint being made Refuge would take this in to consideration.</p>

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	Refuge's Complaints Policy Sections: 2. What is a complaint? 3. What will not be treated as a complaint?	Sections 2 and 3 explain what is and is not a complaint. Section 3 confirms that Refuge will explain the reasons why a matter is not being accepted as a complaint and that the service user has a right to refer this decision to the Ombudsman
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Refuge's Complaints Policy Sections: 2. What is a complaint? 3. What will not be treated as a complaint?	The policy states: "Refuge does not take a blanket approach to excluding complaints and the individual circumstances of each complaint must be considered."

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	Refuge's Complaints Policy Section 5. How should complaints be made?	<p>The policy states:</p> <p>“Service users can make complaints by their preferred method. Complaints can also be submitted via a third party or representative on their behalf.</p> <p>Refuge employees can accept a complaint and will ensure that it is handled in line with Refuge's complaints policy.</p> <p>Complaints can also be sent via email to complaints@refuge.org.uk“</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Refuge's Complaints Policy 5. How should complaints be made?	<p>The policy states:</p> <p>Service users can make complaints by their preferred method. Complaints can also be submitted via a third party or representative on</p>

				<p>their behalf.</p> <p>Refuge employees can accept a complaint and will ensure that it is handled in line with Refuge's complaints policy.</p> <p>Complaints can also be sent via email to complaints@refuge.org.uk.</p> <p>Training on Handling Complaints Professionally is a mandatory training course for members of the Services Department</p>
3.3	<p>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.</p>	Yes	<p>Refuge's Complaints Policy Section 1. Policy Statement KPIs</p>	<p>Refuge's policy statement states:</p> <p>"Refuge is dedicated to fostering a supportive environment where feedback is not only welcomed but seen as a crucial component of our growth and success."</p> <p>Refuge's KPIs cover reporting on complaint's</p>

				<p>management including which service have not reported any complaints.</p> <p>The annual complaints analysis for 2022-23 showed 112% increase in complaints which we believe is due to increased recognition and recording of complaints.</p>
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	Refuge's Complaints Policy	Refuge's Complaints Policy has 2 stages and is published on our website.
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	Refuge's Complaints Policy Section 11. Useful links and contact details	
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	<p>Refuge's Complaints Policy Section 4. Who can make a complaint?</p> <p>Refuge's Complaints Policy Sections:</p> <p>5. How should complaints be made</p>	The policy states: "A service user can have a representative deal with their complaint on their behalf and can be accompanied at any meeting to discuss their complaint. The details of the person representing them

			6. Representation and reasonable adjustments	and/or accompanying should be shared with the person responsible for handling their complaint in advance of any meeting.”
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.		Refuge’s Complaints Policy Sections: 3. What will not be treated as a complaint? 7. Refuge complaints procedure 8. Extensions 11. Useful links and contact details	The policy clearly explains that a resident can go to the Ombudsman if we do not accept the complaint, if there is a delay in our response (extension) and if they are still dissatisfied after stage 2 has been concluded. The role of the Housing Ombudsman’s Service and contact details; with links are included in the policy.

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	Refuge's Director of Service Delivery is Refuge's "complaints officer"	The Director of Service Delivery is Refuge's "complaints officer". They are registered as a contact for the Housing Ombudsman Service, identify complaints that meet the criteria for reporting to The Charity Commission and report on complaints to Refuge's trustees.
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	Refuge's Director of Service Delivery is Refuge's "complaints officer"	Refuge's Director of Service Delivery is a member of the senior leadership team, reporting to the CEO and has access to staff at all levels of the organisation and the autonomy/authority to resolve disputes promptly and fairly.
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	Yes	Handling Complaints Professionally Conducting Investigations	Training on Handling Complaints Professionally is a mandatory training course for members of the Services Department All managers are required to

	handle complaints effectively			<p>complete conducting investigations training</p> <p>Refuge's KPIs cover reporting on complaint's management including which service have not reported any complaints.</p> <p>Refuge will be considering how best to resource complaints management as part of the accommodation charge setting process.</p>
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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	Refuge's Complaints Policy Section 1. Policy Statement	Refuge is dedicated to fostering a supportive environment where feedback is not only welcomed but seen as a crucial component of our growth and success.
5.2	The early and local resolution of issues between landlords and residents is key	Yes	Refuge's Complaints Policy Section 7. Complaints procedure	Refuge has a simple 2-stage process

	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.			
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	Refuge's Complaints Policy Section 7. Complaints procedure	Refuge has a simple 2-stage process
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Refuge does not use a third party to handle complaints.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Refuge does not use a third party to handle complaints	
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	Yes	Refuge's Complaints Policy Section 7. Complaints procedure	The procedure confirms that Refuge will acknowledge the complaint within 3 working days providing a definition of the complaint and the outcomes sought by the service user. It also states that if any

	clarification.			aspect of the complaint is unclear the service user will be asked for clarification.
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	Refuge's Complaints Policy Section 7. Complaints Procedure	The procedure states: "The acknowledgement will include: <ul style="list-style-type: none"> aspects of the complaint that are not Refuge's responsibility"
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	Refuge's Complaints Policy Section 1. Policy Statement	Aligned with the Refuge Overarching Safeguarding Policy, this policy affirms our dedication to maintaining the highest standards of service and support for survivors. We provide clear, accessible procedures for raising and resolving complaints, emphasising the importance of open communication and stakeholder engagement. Through a structured approach we strive to address and rectify any

				<p>issues at the earliest possible opportunity, ensuring that our services continually evolve to meet the needs and expectations of those we serve.</p> <p>Training:</p> <ul style="list-style-type: none"> • Training on Handling Complaints Professionally is a mandatory training course for members of the Services Department • All managers are required to complete conducting investigations training
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the	Yes	Refuge's Complaints Procedure Section 8. Extensions	During the extension period the service user must be kept informed about

	resident suitable intervals for keeping them informed about their complaint.			progress with their complaint at mutually agreed intervals.
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	Refuge's Complaints Procedure Section 6. Representation and reasonable adjustments	Refuge will make reasonable adjustments for service users where appropriate under the Equality Act 2010. Refuge will maintain records of any reasonable adjustments which have been agreed with the service user, as well as a record of any disabilities a service user has disclosed. Any agreed reasonable adjustments must be kept under active review.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Refuge's Complaints Policy Section 3. What will not be treated as a complaint.	The policy sets out what will not be treated as a complaint, the exclusions comply with the provisions of the Complaint Handling Code. The policy also explains that a service user can refer this

				to the Housing Ombudsman Service.
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	Refuge's Casework Management System – Complaints section	All complaints are recorded on Refuge's casework management system. The record includes: 1.1 Complaint stage 1.2 Outcomes at each stage 1.3 Date received 1.4 Date acknowledged of all correspondence/relevant documentation
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	Refuge's Complaint Policy Section 1 Policy Statement	Aligned with the Refuge Overarching Safeguarding Policy, this policy affirms our dedication to maintaining the highest standards of service and support for survivors. We provide clear, accessible procedures for raising and resolving complaints, emphasising the importance of open communication and stakeholder engagement. Through a structured approach we strive to address and rectify any issues at the earliest

				possible opportunity, ensuring that our services continually evolve to meet the needs and expectations of those we serve.
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	Unacceptable Behaviour Policy	This policy is currently under review and will be replaced with the Respectful Engagement Policy
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Unacceptable Behaviour Policy	This policy is currently under review and will be replaced with the Respectful Engagement Policy

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	Refuge's Complaints Policy Section 1 Policy Statement	Through a structured approach we strive to address and rectify any issues at the earliest possible opportunity, ensuring that our services continually evolve to meet the needs and expectations of those we serve.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	The complaint will be acknowledged within 5 working days of receiving the complaint
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	The person investigating the complaint will provide a full response within 10 working days of the complaint being acknowledged.
6.4	Landlords must decide whether an extension to this timescale is needed	Yes	Refuge's Complaints Policy Section 8 Extensions	Refuge will decide whether an extension to the

	<p>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.</p>			<p>timescales within this policy are needed when considering the complexity of the complaint and then inform the service user of the expected timescale for response. During the extension period the service user must be kept informed about progress with their complaint at mutually agreed intervals.</p> <p>An extension must be no more than:</p> <p>Stage 1 - 10 working days</p> <p>Stage 2 - 20 working days</p> <p>There must be a good reason to extend the timescales beyond those set out above, and the reason(s) must be clearly explained to the service user.</p>
6.5	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	Yes	<p>Refuge's Complaints Policy Section 8 Extensions</p>	<p>When informing a service user of an extension to the timescales within this policy the service user must also be provided with the contact details for the Housing</p>

				Ombudsman Service.
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	Refuge's Complaints Policy Section 7 Complaints Procedure	<p>Both stage 1 and stage 2 outcomes are confirmed in writing to the service use in clear, plain language and include:</p> <ul style="list-style-type: none"> ▪ the complaint stage ▪ the complaint definition ▪ the decision on the complaint ▪ the reasons for any decisions made ▪ the details of any remedy offered to put things right ▪ details of any outstanding actions <p>Stage 1 outcomes also include:</p> <ul style="list-style-type: none"> ▪ details of how to escalate the matter to stage 2 if the individual is not satisfied with the response <p>Stage 2 outcomes also include:</p> <ul style="list-style-type: none"> ▪ How to contact the Housing Ombudsman

				Service should the service user be dissatisfied with the outcome
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	Refuge's Complaints Policy Section 7 Complaints Procedure	Outcomes at stage 1 or stage 2 must provide the reasons for any decisions made. This would include any reason's related to policy, law and good practice
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	Where service users 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.
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; 	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	The outcome will be confirmed in writing to the service use in clear, plain language and will include: <ul style="list-style-type: none"> ▪ the complaint stage

	<p>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.</p>			<ul style="list-style-type: none"> ▪ the complaint definition ▪ the decision on the complaint ▪ the reasons for any decisions made ▪ the details of any remedy offered to put things right ▪ details of any outstanding actions ▪ details of how to escalate the matter to stage 2 if the individual is not satisfied with the response
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	Stage 2 – Final stage If all or part of the complaint is not resolved to the service user's satisfaction at stage 1, it must be progressed to stage 2 of the procedure to be reviewed
6.11	Requests for stage 2 must be	Yes	Refuge's Complaints Policy	Requests for a stage 2

	acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.		Section 7 Complaints Procedure	review must be acknowledged, defined, and recorded at stage 2 of the complaint procedure within 5 working days of the escalation request being received.
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	Refuge's Complaints Policy Section 7 Complaints Procedure	If all or part of the complaint is not resolved to the service user's satisfaction at stage 1, it must be progressed to stage 2 of the procedure to be reviewed. The service user is not required to provide a reason for requesting the review
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	A stage 2 complaint review cannot be considered by the same person who considered stage 1
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	A final response to the stage 2 must be provided to the service user within 20 working days of the complaint being acknowledged.
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	Yes	Refuge's Complaints Policy Section 8 Extensions	Refuge will decide whether an extension to the timescales within this policy are needed when considering the complexity of the complaint and then inform the service

	working days without good reason, and the reason(s) must be clearly explained to the resident.			<p>user of the expected timescale for response. During the extension period the service user must be kept informed about progress with their complaint at mutually agreed intervals.</p> <p>An extension must be no more than:</p> <p>Stage 1 - 10 working days Stage 2 - 20 working days</p> <p>There must be a good reason to extend the timescales beyond those set out above, and the reason(s) must be clearly explained to the service user.</p> <p>When informing a service user of an extension to the timescales within this policy the service user must also be provided with the contact details for the Housing Ombudsman Service.</p>
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	Refuge's Complaints Policy SectionS; 7. Complaints Procedure 8. Extensions	When informing a service user of an extension to the timescales within this policy the service user must also be provided with the contact details for the Housing

				Ombudsman Service.
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	Refuge's Complaints Policy Section 7 Complaints Procedure	<p>Both stage 1 and stage 2 outcomes are confirmed in writing to the service use in clear, plain language and include:</p> <ul style="list-style-type: none"> ▪ the complaint stage ▪ the complaint definition ▪ the decision on the complaint ▪ the reasons for any decisions made ▪ the details of any remedy offered to put things right ▪ details of any outstanding actions <p>Stage 1 outcomes also include:</p> <ul style="list-style-type: none"> ▪ details of how to escalate the matter to stage 2 if the individual is not satisfied with the response <p>Stage 2 outcomes also include:</p> <ul style="list-style-type: none"> ▪ How to contact the Housing Ombudsman

				Service should the service user be dissatisfied with the outcome
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	Refuge's Complaints Policy Section 7 Complaints Procedure	Outcomes at stage 1 or stage 2 must provide the reasons for any decisions made. This would include any reason's related to policy, law and good practice
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 the Ombudsman Service if the individual remains dissatisfied. 	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	<ul style="list-style-type: none"> o The outcome of the stage 2 review will be confirmed in writing to the service use in clear, plain language and will include: <ul style="list-style-type: none"> ▪ the complaint stage ▪ the complaint definition ▪ the decision on the complaint ▪ the reasons for any decisions made ▪ the details of any remedy offered to put things right ▪ details of any outstanding actions ▪ How to contact the Housing Ombudsman Service should the

				service user be dissatisfied with the outcome
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Refuge's Complaints Policy Section 7 Complaints Procedure	Stage 2 is the final stage of Refuge's process. The Director of Service Delivery is the complaint's officer and has access to staff across the organisation to ensure that appropriate staff are involved in the response.

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; 	Yes	Refuge's Complaints Policy Section 9 Putting things right	<p>Where something has gone wrong Refuge will 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

	<ul style="list-style-type: none"> • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			<p>reasons</p> <ul style="list-style-type: none"> • taking action if there has been delay • reconsidering or changing a decision • amending a record or adding a correction or addendum • changing policies, procedures, or practices
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Refuge's Complaints Policy Section 9 Putting things right	The remedy offered should reflect the impact of the mistake on the service user and must clearly set out what will happen and by when, in agreement with the service user where appropriate. Any remedy proposed must be followed through to completion and the service user must be kept informed of progress. For residents Refuge will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes	Refuge's Complaints Policy Section 9 Putting things right	Any remedy proposed must be followed through to

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			completion and the service user must be kept informed of progress.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Refuge's Complaints Policy Section 9 Putting things right	For residents Refuge will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<p>Annual complaints analysis Annual self-assessment KPIs Refuge's Complaints Policy Section 10. Compliance with Complaint Handling Code</p>	<p>Refuge provides a detailed annual analysis of complaints to the Board of Trustees which includes analysis of:</p> <ul style="list-style-type: none"> • number of complaints received by stage/source • complaint category • theme • service • outcomes • ethnicity • services not reporting complaints. <p>The detailed analysis for 2023/24 was designed for internal scrutiny, a summary of key points will be published on Refuge's website. The format will be reviewed for 2024/25 so the full analysis is suitable for external use.</p> <p>There have been no</p>

				<p>complaints that Refuge have refused to accept other than those where we were not the intended recipient.</p> <p>All complaints which have been escalated to stage 3 of the complaint process are reported to our Services and Safeguarding Committee quarterly.</p> <p>Future reporting will reflect the requirements of the Complaint Handling Code 2024</p>
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual complaints analysis Governing body response Refuge's Complaints Policy Section 10. Compliance with Complaint Handling Code	Refuge provides a detailed annual analysis of complaints to the Board of Trustees. A summary of this is published on Refuge's website. The trustees response to the report is recorded in the committee papers.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Annual self-assessment Refuge's Complaints Policy Section 10. Compliance with Complaint Handling Code	The current self-assessment was completed following a review of Refuge's Complaints Policy in August 2024.
8.4	Landlords may be asked to review and	Yes	Refuge's Complaints Policy	There has been no

	update the self-assessment following an Ombudsman investigation.		Section 10. Compliance with Complaint Handling Code	investigation by the Housing Ombudsman Service, however Refuge would review the annual self-assessment if required to do so by the Housing Ombudsman
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	Refuge's Complaints Policy Section 10. Compliance with Complaint Handling Code	There have been no exceptional circumstances making Refuge unable to comply with the Code, however should this occur we would inform the Housing Ombudsman Service, provide information to service users, and publish this on our website, providing a timescale for returning to compliance with the Code.

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	Refuge's Complaints Policy Section 1 Policy Statement	<p>Our comprehensive complaints policy ensures that all feedback, particularly complaints, is addressed respectfully, efficiently, and effectively, promoting continuous improvement and stakeholder satisfaction.</p> <p>Refuge is dedicated to fostering a supportive environment where feedback is not only welcomed but seen as a crucial component of our growth and success.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Refuge's Complaints Policy Section 1 Policy Statement	<p>Our comprehensive complaints policy ensures that all feedback, particularly complaints, is addressed respectfully, efficiently, and effectively, promoting continuous improvement and stakeholder satisfaction.</p>

				Refuge is dedicated to fostering a supportive environment where feedback is not only welcomed but seen as a crucial component of our growth and success.
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	Refuge's website	Refuge's complaints performance is shared with staff at internal meetings and is published on our website
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Director of Service Delivery is Refuge's complaints officer.	<p>The Director of Service Delivery is Refuge's complaints officer.</p> <p>An annual analysis of complaints is conducted which is presented to Refuge's Services and Safeguarding Committee.</p> <p>The analysis includes:</p> <ul style="list-style-type: none"> • number of complaints received by stage/source • complaint category

				<ul style="list-style-type: none"> • theme • service • outcomes • ethnicity • services not reporting complaints.
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	The Member responsible for Complaints is a trustee and a member of Refuge's Services and Safeguarding Committee	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The Member responsible for Complaints is a trustee and a member of Refuge's Services and Safeguarding Committee	<p>An annual analysis of complaints is conducted which is presented to Refuge's Services and Safeguarding Committee.</p> <p>The analysis includes:</p> <ul style="list-style-type: none"> • number of complaints received by stage/source • complaint category • theme • service • outcomes • ethnicity • services not reporting

				complaints.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>	Yes	The MRC is a trustee and a member of Refuge's Services and Safeguarding Committee	<p>An annual analysis of complaints is conducted which is presented to Refuge's Services and Safeguarding Committee.</p> <p>The analysis includes:</p> <ul style="list-style-type: none"> • number of complaints received by stage/source • complaint category • theme • service • outcomes • ethnicity • services not reporting complaints. <p>Refuge has not been investigated by the Housing Ombudsman Service, if this should occur this would form part of the report.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues</p>	Yes	The Director of Service Delivery is Refuge's complaint officer	The Director of Service Delivery is Refuge's complaint officer and as a member of the Senior Leadership Team has access to all departments to ensure a collaborative and

	<p>across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>co-operative approach to complaints handling</p> <p>Training on Handling Complaints Professionally is a mandatory training course for members of the Services Department</p>
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