

## Appendix A: 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	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>Complaints Policy: <a href="#">Connexus Complaints Policy   Connexus (connexus-group.co.uk)</a> Page 2 Section 2.2</p> <p>Complaints page of the Connexus website <a href="#">Complaints   Connexus (connexus-group.co.uk)</a></p>	<p>We adopted this definition when the Complaint Handling Code was published and this is used in our complaints policy and on our website</p>
1.3	<p>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.</p>	Yes	<p>Internal complaints procedure: Page 2, Section 3.2 Page 3, Section 4.1</p> <p>The relevant sections of the procedure are set out on the complaints page of the Connexus website under ‘Our Promise’  <a href="#">Complaints   Connexus (connexus-group.co.uk)</a></p>	<p><i>We aim to put things right that have gone wrong quickly, fairly and effectively.</i></p> <p><i>We will:</i></p> <ul style="list-style-type: none"> <li>• <i>Give you the choice to make a complaint if you express dissatisfaction</i></li> <li>• <i>Handle complaints submitted via a non-legal third party or representative in the same way as one received directly from a customer, once we have confirmation that they are acting on a</i></li> </ul>

				<i>customer's behalf</i>
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 Page 2, section 2.1  Complaints page of the Connexus website <a href="http://Connexus.comnexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	Service requests are recorded on the Complaints system as Service Requests. They are still given a CXG number as this allows us to monitor themes/service area/learning like we do with complaints. It also allows us to move from a service request to complaint with all the notes in the same place if the issue is not put right
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 Page 4, section 2.7	<i>'We will therefore discuss an individual's concerns and how best to resolve them when an individual first tells us of their dissatisfaction. These efforts will not obstruct access to the formal complaints procedure or result in any unreasonable delay.'</i>
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	Yes	<i>The IFF (data research company) interviewer is instructed to read a set script at the end of each survey (Anniversary/ Repairs and Gas/ Investments/ Development/ Moving In)</i>  On the SMS surveys sent from	IFF Script: <i>'Thank-you for your time today, your feedback is really important to Connexus and will be used to improve services. If you are dissatisfied with the service from Connexus and would like to complain, you can do this by contacting customer</i>

	details of how residents can complain.		Connexus, we respond if a customer has scored the service 1 or 2 and advise them how to complain	<p><i>services on 03332 31 32 33 or via email Complaints@Connexus-group.co.uk or by going to their website to complete a complaints form.'</i></p> <p><i>SMS wording: 'As you have expressed dissatisfaction in your feedback scores/comments, your concerns will be investigated further, however, please note these will not be logged as a complaint. If you do wish to complain, you can do this by calling contacting customer service on 03332 31 32 33; via email Complaints@connexus-group.co.uk or by visiting the website <a href="https://Connexus-group.co.uk/complaints">https://Connexus-group.co.uk/complaints</a>'</i></p>
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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	Yes	Complaints policy Page 3, Section 2.4  Complaints page of the Connexus website under 'Our approach'  <a href="https://www.connexus-group.co.uk/complaints">Complaints   Connexus (connexus-group.co.uk)</a>	The detail is included in both the policy and on the website concluding with the line: <i>'If we tell you that we will not accept a complaint, we will explain why in writing and advise you of your right to challenge this decision by taking your complaint to the appropriate Ombudsman, if applicable'</i>
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and</li> </ul>	Yes	Complaints policy Page 3, Section 2.4  Complaints page of the Connexus website under 'Our approach'  <a href="https://www.connexus-group.co.uk/complaints">Complaints   Connexus (connexus-group.co.uk)</a>	The exclusions listed in the Housing Ombudsman Code are listed along with:  <i>When the matter is best dealt with under a different policy e.g. a complaint about a neighbour (Anti-Social Behaviour policy)</i>  <i>Where there is an allegation of illegal or criminal wrongdoing which should be dealt with through police/ courts or other</i>

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			<p><i>appropriate organisations in conjunction with our HR team. This includes allegations of violence/ intimidation/ harassment or theft.</i></p>
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Complaints policy Page 3, Section 2.4</p>	<p><i>'We will consider the individual circumstances for each complaint'</i></p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints 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.</p>	Yes	<p>Complaints policy Page 3, Section 2.4</p> <p>Complaints page of the Connexus website under 'Our approach'</p> <p><a href="https://www.connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a></p>	<p><i>'If we tell you that we will not accept a complaint, we will explain why in writing and advise you of your right to challenge this decision by taking your complaint to the appropriate Ombudsman, if applicable'</i></p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p>Internal complaints procedure Page 3, Section 4.5</p>	<p><i>'The Customer Experience Team will determine if the complaint should be excluded, in conjunction with a Head of Service.'</i></p>

### 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 Page 2, Section 2.1 Page 4, Section 2.10  Complaints page of the Connexus website under 'How do I make a complaint?' and under 'Our Promise' <a href="http://Connexus (connexus-group.co.uk)"><u>Complaints   Connexus (connexus-group.co.uk)</u></a>	<i>We will provide customers with easy access to the complaints process giving them a choice in how they can make a complaint without delay. Customers can complain in person, or in writing, as set out in the procedure.</i>  <i>'All policies are subject to an Equalities Impact Assessment to ensure that any adaptations to the normal policy or procedure may be applied to accommodate an individual's needs'</i>
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	Internal complaints procedure Page 3, Section 4.3	<i>All colleagues will know how to guide a customer to make a complaint and if they are told of a customer's dissatisfaction, they will notify <a href="mailto:complaints@connexus-group.co.uk">complaints@connexus-group.co.uk</a>, so that it may be recorded correctly</i>
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	Yes	Complaints policy Page 2, Section 1.2	<i>We have seen a 110% increase in complaints in the last year demonstrating that customers are aware of how to complain. In</i>

	complaint volumes are potentially a sign that residents are unable to complain.			addition, we suggest to a customer that they should make a complaint when they raise concerns more than once
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	<p>Complaints policy Page 3, Section 2.5</p> <p>Complaints page of the Connexus website under 'Our approach'</p> <p><a href="https://www.connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a></p>	<p><i>Connexus has a two-stage complaint process with specified timescales in which to respond:</i></p> <ul style="list-style-type: none"> <li>• <i>Stage 1 – Complaint – 10 working days from the acknowledgment date</i></li> <li>• <i>Stage 2 – Review – 20 working days from the acknowledgment date</i></li> </ul>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Complaints Policy Page 5, section 3.1</p> <p>Complaints page of the Connexus website</p> <p><a href="https://www.connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a></p>	<p><i>'Connexus will advise all customers annually about the complaints process and their right to access the Housing Ombudsman service, not just when they have been through Connexus' formal complaints process.'</i></p> <p><i>Last article - Autumn 2023 - detailed the changes to the Housing Ombudsman powers and advised customers how to make a complaint</i></p>
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	Yes	<p>Complaint Policy Page 5, section 3.2</p>	<p><i>Handle complaints submitted via a non-legal third party or representative in the same way as one received directly from the customer, once we have</i></p>



	the landlord.			<i>confirmation they are acting on the customers behalf</i>
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	<p>Complaints page of the Connexus website under 'The Housing Ombudsman Service'</p> <p><a href="http://connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a></p> <p>Complaints policy Page 5, section 3.1</p> <p>Our acknowledgement and response letters have a standard paragraph to notify the customer about the Housing Ombudsman</p>	<p><i>Website wording: '...you can contact the Housing Ombudsman at any time to help you when making a complaint. Their details are in the Housing Ombudsman Service section below.'</i></p> <p><i>Letter wording The Housing Ombudsman are also available to offer help and advice throughout the complaint process, should you wish to contact them. Their details are below:</i></p> <p><i>The Housing Ombudsman can be contacted in the following ways: By phone: Tel: 0300 111 3000 / 9.00am-5.00pm: Monday to Friday By post: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET By email: <a href="mailto:info@housing-ombudsman.org.uk">info@housing-ombudsman.org.uk</a>; Online: <a href="https://www.housing-ombudsman.org.uk/residents/make-a-complaint">https://www.housing-ombudsman.org.uk/residents/make-a-complaint</a></i></p>

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	Complaint Policy Page 5, section 3.2 Page 6, section 3.3	<p><i>Connexus will: Have a team to manage the complaints process and monitor compliance with the Housing Ombudsman Complaint Handling Code. '</i></p> <p><i>'Connexus' Director of Customer Experience assumes lead responsibility for its complaint handling.'</i></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 Page 3, section 2.6 Page 5, section 3.2	<p><i>'Connexus will: Have appropriate managers who will respond to complaints. They will:</i></p> <p><i>a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</i></p> <p><i>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others</i></p> <p><i>c) act within the professional standards for engaging with</i></p>

				<i>complaints as set by any relevant professional body  d) have the appropriate authority to offer suitable remedies to resolve a complaint'</i>
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 Page 7, section 4.10  Page 5, section 2.11	' <i>Colleagues who as part of their role either respond to, or receive complaints, will receive ongoing training to ensure their skills and knowledge are maintained.'</i>  ' <i>All colleagues are required to follow the complaints policy and procedure, which will ensure Connexus complies with the code. Disciplinary action may be taken if a colleague regularly fails to follow the policy and/or procedure'</i>

## 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 Page 2, Section 1.4  Complaints page of the Connexus website  <a href="https://www.connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	<i>The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.</i>  <i>If you make a complaint, you will not receive any discrimination or a lesser service as a result.</i>
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 Page 2, Section 2	<i>The early and local resolution of issues between Connexus and our customers is key to effective complaint handling. We will therefore discuss an individual's concerns and how best to resolve them when an individual first tells us of their dissatisfaction. These efforts will not obstruct access to the formal complaints procedure or result in any unreasonable delay.</i>
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 Page 3, section 2.5  Complaints page of the Connexus website under 'Our Approach'	<i>'Connexus has a two-stage complaint process with specified timescales in which to respond'</i>

			<a href="http://connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	
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 Page 3, Section 2.6	Complaints are not passed to a contractor for a response – they are handled at both stages within Connexus
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As 5.4	As 5.4
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 procedure Page 3, Section 5.5 Page 6, Section 6.5  The above are set out on our complaints page on the website  <a href="http://connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>  The acknowledgement letter templates include this detail	<i>'The acknowledgement letter will set out the reason for the complaint and the outcome the customer is seeking.</i>  <i>'Contact the customer within the first 3 days of the Review request to understand why they feel Connexus has not resolved their complaint. Should a customer choose not to tell us, we will base the review on their initial complaint and how we responded'</i>

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 Page 5, Section 3.2  Complaints procedure Page 4, Section 5.2	<p><i>‘ Be clear what is, or is not, within our responsibility and manage expectations’</i></p> <p><i>‘The manager is responsible for managing expectations about possible outcomes.’</i></p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ol>	Yes	Complaints policy Page 3, Section 2.6 Page 5, Section 3.2	<p><i>‘A Manager from the service area about which there is a complaint, will investigate and respond. They will not have had any involvement in the issue prior to receiving the complaint.’</i></p> <p><i>‘A Connexus Complaints Manager will investigate, review and respond, or a colleague at a suitably senior level. Again, they will not have been involved prior to the stage 2 review. They will be authorised to provide a final response on behalf of Connexus.’</i></p> <p><i>‘ Be positive about complaints • Give the resident a fair chance to set out their position’</i></p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals	Yes	Complaints policy Page 3, section 2.5	<i>‘Extensions to these timescales may be required, if so, we will clearly state our reasons why and update the customer beforehand’</i>

	for keeping them informed about their complaint.		<p>Internal complaints procedure Page 5, section 5.7 Page 6, section 6.6</p> <p>Complaints page on website <a href="http://Connexus (connexus-group.co.uk)"><u>Complaints   Connexus (connexus-group.co.uk)</u></a></p>	<p><i>From the website:</i> <i>(Stage 1) 'If we need more time to investigate, we will contact you to advise you of a revised response date. We will aim to not delay the response longer than a further 10 working days'</i></p> <p><i>(Stage 2) 'They will then confirm the outcome in writing within 20 working days of the acknowledgement, unless we have advised you that we need to extend this timescale. This would usually be by no more than 20 working days unless there is a genuine reason to do so.'</i></p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>Complaints Policy Page 4, section 2.10:</p> <p>Reasonable adjustment policy <a href="http://Connexus (connexus-group.co.uk)"><u>Reasonable Adjustments   Connexus (connexus-group.co.uk)</u></a></p>	<p><i>The Formal Complaints process has been designed to be accessible to all, but we will proactively ask customers if they need any support or reasonable adjustments when accessing/ using our services. We will do this in the following ways:</i></p> <ul style="list-style-type: none"> <li><i>• By including a paragraph in written communications (e.g. acknowledgement letters) that proactively asks if adjustments or support are needed.</i></li> <li><i>• By asking whether a reasonable adjustment might be required over</i></li> </ul>

				<p><i>the telephone.</i></p> <ul style="list-style-type: none"> <li><i>• By including a note on our published documents indicating that we can provide the document in an alternative format on request.</i></li> </ul> <p><i>We will record any reasonable adjustments requested when dealing with the complaint. This will be in accordance with the Reasonable Adjustments Policy and procedure</i></p> <p><i>From the website:</i>  <i>We believe in providing equal opportunities for all by ensuring our customers' needs are recognised and met. Where possible, we will make reasonable adjustments to ensure residents can access our services. To find out more, check our reasonable adjustments policy.</i></p>
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	Complaint policy Page 4, section 2.8	<p><i>'We will accept a request to escalate a complaint from the time we provide our complaint response, up to a calendar month after any resultant actions have been completed. '</i></p> <p>Due to a Housing Ombudsman determination this year, we ensure</p>



				that a response always goes through stage 1 before going to stage 2
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 policy Page 3, section 2.5	<i>'Record keeping during all stages of a complaint is crucial, as such Connexus will keep comprehensive records of what we do to try and resolve an individual's concerns, including recording them on our central complaint system'</i>
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 Page 6, section 3.2	<p><i>'Connexus aims to record and resolve complaints quickly, fairly and effectively. We will:</i></p> <ul style="list-style-type: none"> <li><i>• Recognise and acknowledge when we have got things wrong and put things right quickly.</i></li> <li><i>• Clearly explain the reasons for our decisions.</i></li> <li><i>• Seek to learn from complaints to improve future performance.</i></li> <li><i>• Recognise that putting things right is every colleague's responsibility.'</i></li> </ul> <p><i>'Have appropriate managers who will respond to complaints. They will:</i></p>

				<i>have the appropriate authority to offer suitable remedies to resolve a complaint'</i>
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	<p>Unacceptable User Action Policy Page 4, section 3.15 Page 6, section 3.27</p> <p>Website - Policy page: <a href="#">Documents   Connexus (connexus-group.co.uk)</a></p> <p><a href="#">unacceptable-user-actions-and-behaviour-policy.pdf (connexus-group.co.uk)</a></p>	<p><i>The actions we will consider can include the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Warning the customer about their behaviour and requesting that the customer modifies their behaviour in future contact with us</i></li> <li>• <i>Appointing a specific point of contact for the customer</i></li> <li>• <i>Communicating only in writing, e-mail or via a nominated representative</i></li> <li>• <i>Deciding not to investigate a complaint or issue</i></li> <li>• <i>Restricting or limiting contact with Connexus</i></li> <li>• <i>In exceptional circumstances, notify relevant public authorities where significant security or health and safety concerns are identified</i></li> </ul> <p><i>Case Review</i> <i>'Connexus will undertake a review of each case once every two years. The review will be conducted by an independent Head of Service and will consider whether, in the opinion of the reviewer, the user's</i></p>

				<i>behaviour has improved sufficiently to remove all restrictions and/or remove certain/specific restrictions.'</i>
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	There is an equality impact assessment with the policy that ensures it does not adversely affect customers with protected characteristics  unacceptable-user-actions-and-behaviour-policy.pdf (connexus-group.co.uk)	

## 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	Yes	Complaints policy Page 4, section 2.7 Page 6, section 3.2  Internal complaints procedure Page 4, section 5.2 Page 4, section 5.3	<i>'When a complaint is raised, we will endeavour to resolve it as soon as possible and within the timescales set out for that stage'</i>  <i>'Recognise and acknowledge when we have got things wrong and put things right quickly'</i>  <i>'The Manager is responsible for contacting the customer within the</i>

	provided to the resident.			<p><i>first 3 working days following receipt of the complaint to confirm the reasons for the complaint and to discuss the outcomes the customer is seeking. The manager is responsible for managing expectations about possible outcomes'</i></p> <p><i>'The Manager should also agree the customer's preferred method of communication for contact during the complaint process and confirm any reasonable adjustments that may be required. They should then adhere to any agreements and record this on the complaint file'</i></p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Internal complaints procedure Page 4, section 5.2 and 5.4	<p><i>'The Manager is responsible for contacting the customer within the first 3 working days following receipt of the complaint to confirm the reasons for the complaint and to discuss the outcomes the customer is seeking. The manager is responsible for managing expectations about possible outcomes'</i></p> <p><i>'Managers will be required to note their initial conversation within 24 hours on the complaint system to allow a member of the</i></p>

				<i>Communities team to send the acknowledgement letter, within the 5 working days of receipt deadline'</i>
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Internal complaints procedure Page 4, section 5.6  Website complaints page under Complaints – Stage 1  <a href="http://Connexus (connexus-group.co.uk)"><u>Complaints   Connexus (connexus-group.co.uk)</u></a>	<i>'The manager will investigate the matters raised and then contact you to discuss the outcome of our investigations with you before we send you a full written response. This will be within 10 working days of the acknowledgement.'</i>
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	Internal complaints procedure Page 5, section 5.8  Website complaints page under Complaints – Stage 1  <a href="http://Connexus (connexus-group.co.uk)"><u>Complaints   Connexus (connexus-group.co.uk)</u></a>	Website wording <i>'If we need more time to investigate, we will contact you to advise you of a revised response date. We will aim to not delay the response longer than a further 10 working days.'</i>
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	Internal complaints procedure Page 5, section 5.9	<i>'If a manager advises a customer that they are extending the deadline by which they will respond, they will provide them with the contact details of the Housing Ombudsman'</i>
6.6	A complaint response must be provided to the resident when the answer to the complaint is known,	Yes	Internal complaints procedure Page 5, section 5.12	<i>'A complaint response will be sent when the answer to the complaint is known, not when the outstanding</i>

	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.			<i>actions required to address the issue are completed.'</i>
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	Internal complaints procedure Page 4, section 5.7	<i>'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'</i>
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	Internal complaints procedure Page 4, section 5.6	<i>'If a customer raises other issues during the stage 1 investigation, Connexus will agree with the customer if they will be considered as part of the existing stage 1, if they are related and the response has not been issued. If the stage 1 response has been issued, the issues are unrelated, or if the time to investigate the new issues would unreasonably delay the original response, then they would be considered a new complaint.'</i>
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition;	Yes	Internal complaints procedure Page 4, section 5	We have a letter template to guide managers to include all relevant points

	<p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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	<p>Complaints policy Page 4, section 2.8</p> <p>Our stage 1 response letter always includes the following paragraph: <i>'If you feel that we are unable to reach a suitable outcome, you may request that your complaint is escalated to the next stage of our complaints procedure, which is a Review by the Complaints Manager'</i></p>	<i>'We will accept a request to escalate a complaint from the time we provide our complaint response, up to a calendar month after any resultant actions have been completed'</i>
6.11	Requests for stage 2 must be acknowledged, defined and logged	Yes	Internal complaints Procedure Page 6, section 6.5	<i>'Aim to contact you within the first 3 days of the Review request to</i>

	at stage 2 of the complaints procedure within five working days of the escalation request being received.		Website complaints page under Complaints – Stage 2  <a href="http://Connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	<i>understand what you feel has gone wrong and why you feel Connexus has not resolved your complaint.</i>
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	Internal complaints Procedure Page 6, section 6.5  Website complaints page under Complaints – Stage 2  <a href="http://Connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	<i>Should you choose not to tell us, we will base the review on your initial complaint and how we responded. We will send a written acknowledgement of the Review within 5 working days.'</i>
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 Page 4, section 2.6	<i>A Connexus Complaints Manager will investigate, review and respond, or a colleague at a suitably senior level. Again, they will not have been involved prior to the stage 2 review. They will be authorised to provide a final response on behalf of Connexus</i>
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Complaints Policy Page 3, section 2.5	Connexus has a two-stage complaint process with specified timescales in which to respond: <ul style="list-style-type: none"> <li>▪ Stage 1 – Complaint – 10 working days from the acknowledgment date</li> <li>▪ Stage 2 – Review – 20 working days from the acknowledgment date</li> </ul>
6.15	Landlords must decide whether an	Yes	Internal complaints Procedure	<i>In exceptional circumstances and</i>



	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.		Page 6, section 6.6	<i>due to the complexity of some complaints, the Complaints Manager may require longer than the 20 working days to complete their review. If an extension is required, the Complaints Manager will contact the customer within the first 15 working days of the review being received to agree a date by which they will respond and again provide the customer with the contact details of the Housing Ombudsman</i>
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	As noted above at 6.15	As noted above at 6.15
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	Internal complaints procedure Page 6, Section 6.5	<i>'Provide the response when the Review is concluded, not when the outstanding actions from the proposed resolution are complete'</i>
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	Yes	Internal complaints procedure Page 6, section 6.5	Review the original investigation and consider: • if the investigation was thorough and demonstrates a full understanding of the complaint and

	appropriate.			<p>answers all points raised in their original complaint</p> <ul style="list-style-type: none"> <li>• if Connexus has provided clear reasons for any decisions and referenced the relevant policy and procedure, law and good practice where appropriate in the complaint response</li> <li>• whether the notes and evidence recorded support the proposed resolution</li> <li>• whether the resolution proposed fully remedies any failure in service</li> <li>• whether the complaint response was comprehensive, empathetic and met the requirements of the Housing Ombudsman complaint handling code.</li> </ul>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the</li> </ol>	Yes	Internal complaints procedure Page 5, section 6	We have a letter template that guides the Complaints Manager to include all relevant points

	matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Internal complaints procedure Page 5, section 6.1	<i>'The Complaints Manager, along with the Head of Service, or Director, is authorised to provide the final response at Review (stage 2) on behalf of Connexus. In their absence, their Line Manager, or a member of the Senior Management Team will review the complaint.'</i>

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> </ul>	Yes	<p>Complaints policy Page 6, section 3.2</p> <p>Internal complaints procedure Page 5, section 5.14 Page 7, section 6.9</p>	<ul style="list-style-type: none"> <li>• <i>'Recognise and acknowledge when we have got things wrong and put things right quickly.'</i></li> <li>• <i>'Clearly explain the reasons for our decisions.'</i></li> <li>• <i>'Seek to learn from complaints to improve future performance.'</i></li> <li>• <i>'Recognise that putting things right is every colleague's responsibility'</i></li> </ul> <p><i>'The investigating manager must identify where Connexus has failed in its service and make changes to process or the application of a</i></p>

	<ul style="list-style-type: none"> <li>•Amending a record or adding a correction or addendum;</li> <li>•Providing a financial remedy;</li> <li>•Changing policies, procedures or practices.</li> </ul>			<p><i>policy or procedure to improve service delivery'</i></p> <p><i>'The Complaints Manager will identify (where applicable) if Connexus has failed in its service and work with the relevant Heads of Service/Directors to make changes to process or the application of a policy or procedure to improve service delivery.'</i></p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Connexus' Compensation policy - available on the website - Policy page: <a href="https://www.connexus-group.co.uk/documents">Documents   Connexus (connexus-group.co.uk)</a></p> <p>and internal procedure provide guidance</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	<p>Internal complaints procedure Page 5, section 5.7 Page 5, section 5.13</p>	<p><i>'Provide a written response outlining their investigation, findings and a proposed timebound resolution, within 10 working days of the acknowledgment letter'</i></p> <p><i>'The investigating manager is responsible for monitoring the complaint until all the resolutions are completed and if there are unforeseen delays, keep the</i></p>

				<i>customer updated of any revised timeframes'</i>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation Policy and internal compensation procedure	We used the Housing Ombudsman remedies guidance to inform our Compensation policy and procedure and consider any new determinations received to amend what is offered.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by</li> </ul>	Yes	Complaints page of the Connexus website – option to download at the bottom of the page  <a href="https://www.connexus-group.co.uk">Complaints   Connexus (connexus-group.co.uk)</a>	

	<p>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>			
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 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 page of the Connexus website – option to download at the bottom of the page</p> <p><a href="http://Connexus (connexus-group.co.uk)"><u>Complaints   Connexus (connexus-group.co.uk)</u></a></p>	
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	<p>Internal complaints procedure Page 8, section 7.9</p>	<p><i>'Connexus will carry out a self assessment against the Housing Ombudsman Complaint handling code following any significant changes, such as a restructure, merger or change to policy/ procedure'</i></p>
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes	<p>Internal complaints procedure Page 7, section 7.4</p>	<p><i>'Where the Housing Ombudsman provides a determination on a complaint, the Customer Experience Team will arrange a</i></p>

				<i>meeting to review the outcome with the appropriate team. The departmental Head of Service will nominate a member of their team to ensure all orders are completed within the timeframe stated.'</i>
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	Connexus had a cyber attack in December 2023 and we notified the Housing Ombudsman and our customers at the time	This was in the form of direct correspondence (email) to the Housing Ombudsman and a message on our website and communication to customers who raised a complaint during the incident.

### 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	Internal complaints procedure Page 9, section 9.3	<i>'The data collected will be used to produce regular reports and analysis of complaints to ensure Connexus learns from complaints and services are improved as result of customer feedback through complaints. We will look beyond the circumstances of an individual complaint and consider whether service improvements can be made as a result of any learning</i>

				<i>from the complaint.'</i>
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.		Complaints policy Page 2, section 1.3 Page 6, section 4.2	<i>'We will ensure that Connexus views complaints as an opportunity to improve. We will highlight poor practice and put it right; taking each complaint as an opportunity to learn from our mistakes.'</i>  <i>'We will monitor the root cause of complaints and the outcomes and use this feedback to improve our services and reduce the number of complaints about the same issues'</i>
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.		Complaints policy Page 6, section 4.3  Connect newsletters  <a href="https://www.connexus-group.co.uk">Connect Magazine - Winter 2023   Connexus (connexus-group.co.uk)</a>	<i>'We will demonstrate to customers what we are learning from complaints and what we have changed, at least annually, through our newsletter which is sent to every customer'</i>  In the winter 2023 newsletter, we confirmed the <a href="https://www.connexus-group.co.uk">Connexus Annual Report</a> was available – <a href="https://www.connexus-group.co.uk">this provided the information on complaints</a>  <a href="https://www.connexus-group.co.uk">Connexus Annual Report 2023   Connexus (connexus-group.co.uk)</a>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or		Complaints policy Page 6, section 3.3	<i>'Connexus' Director of Customer Experience assumes lead responsibility for its complaint handling'</i>



	trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.			
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').		Complaints policy Page 7, section 4.8 and 4.9	<p><i>'The Head of Communities will update the lead Board member of any determinations that result in service failure or maladministration and invite them to take part in any review of a complaint that resulted in a determination of severe Maladministration'</i></p> <p><i>'The Head of Communities will meet at least twice-yearly with the nominated lead Board member for complaints'</i></p>
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.		Complaints policy Page 7, section 4.8 and 4.9	As above
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of</li> </ul>		Complaints policy Page 6, section 4.4 Page 7, section 4.7	<i>'The Customer Experience team will produce an annual report for the Customer Experience Committee. This report will include: a) the annual self-assessment'</i>

	<p>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>			<p><i>against the Code to ensure Connexus' complaint handling policy remains in line with its requirements.</i></p> <p><i>b) a qualitative and quantitative analysis of Connexus complaint handling performance. This will also include a summary of the types of complaints Connexus has refused to accept.</i></p> <p><i>c) any findings of non-compliance with the Code by the Ombudsman.</i></p> <p><i>d) the service improvements made as a result of the learning from complaints.</i></p> <p><i>e) any annual report about Connexus' performance from the Ombudsman.</i></p> <p><i>f) any other relevant reports or publications produced by the Ombudsman in relation to the work of Connexus'</i></p> <p><i>'In addition to the report at 4.4, the Customer Experience Team will provide a half yearly update to the Customer Experience Committee to include:</i></p> <p><i>i. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</i></p>
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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 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>Complaints policy Page 6, section 3.2</p>	<p><i>Have appropriate managers who will respond to complaints. They will:</i></p> <p><i>a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</i></p> <p><i>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others</i></p> <p><i>c) act within the professional standards for engaging with complaints as set by any relevant professional body</i></p> <p><i>d) have the appropriate authority to offer suitable remedies to resolve a complaint'</i></p>