

The Sutton Turner Houses

Charity number: 1155069

Annual Complaints Performance & Service Improvement Report

1 April 2023 - 31 March 2024

This report is considered by the Board of Trustees each year

Annual complaints self-assessment

See below.

Qualitative and quantitative analysis of complaint handling performance

No formal complaints were received.

Summary of the types of complaints The Sutton Turner Houses has refused to accept

Not applicable.

Any findings of non-compliance with the Code by the Ombudsman

None.

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Service improvements made as a result of the learning from complaints

Not applicable

Actions following any annual report about the landlord's performance from the Ombudsman

Not applicable.

Actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of The Sutton Turner Houses

Not applicable.

Board of Trustees Response to this Report

The charity has received no complaints this year.

The charity has amended the Residents' Complaints Policy & Procedures to bring it in line with the revised requirements from the Housing Ombudsman.

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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	Included in policy	Trustees listen to all residents views, comments etc.
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	Included in policy	Examples of third party included, carer, family member or representative.
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	Yes	Included in policy	We will try to resolve issues at first point of contact as a service request. If this is not resolved or the customer requests this we will log as a formal complaint. Service requests are recorded,

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	recorded, monitored and reviewed regularly.			monitored and reviewed regularly.
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.	No	Not covered by current policy	We are in the process of updating our current policy.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	All residents have a copy of the complaints policy included with their residents handbook. Trustees surveying residents take on board complaints/ service requests.	Trustees address service requests and/or complaints as part of annual site visit.

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	Included in policy	All service requests and complaints have been listened to.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	Yes	Policy section 2.1	Currently our policy is that any issue that occurred over 6 months ago will not be accepted. We will update our policy to reflect the 12-month time period.

	Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	No	Policy section 2.1	This will be updated from 6 months to 12 months.
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	Included in policy	All complaints accepted within timeframe.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Included in policy	We do not used a blanket approach and consider each complaint on it's merits.

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	Included in policy	Residents are able to make a complaint either in writing or by email. Therefore, there is more than one route of access. As we deal with issues at first point of contact as a service request this is usually dealt with over the phone or in person on a site visit.
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	Included in policy	Residents can email the clerk to the trustees or address a complaint in writing to the address listed on the complaints policy. Residents also have all the numbers for everyone in the team. We are currently in the process of preparing a contact sheet to send out to all residents to ensure they have everyone's details.

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3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Policy needs updating to reflect this statement, but policy is well published and residents are encouraged to complain.	While we have had no formal complaints this year we are a small Almshouse with only 33 properties. At our annual site visit various service requests were raised, and we were able to deal with these without leading to further complaints.
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	Complaints policy	The complaints policy is provided to all residents on their appointment to the charity. We are also in the process of getting a website so that this can be uploaded to the website for easier access.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No	Policy needs updating	We are in the process of updating our complaints policy to include this.
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	Policy Sections 1.5 – 1.8. Policy will be further updated to reflect representative can attend meeting or accompany residents.	We give all residents the opportunity to have a representative deal with their complaint.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	Included in policy	We provide all residents with information and contact

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	individual can engage with the Ombudsman about their complaint.			details for the housing ombudsman service
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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	Policy Section 1.4	The clerk to the trustees is responsible for complaint handling.
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	Policy section 1.4	The clerk to the trustees in Nelsons charity administration team. There are different staff of all levels within the team that can deal with complaints.
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	All staff are familiar with the complaints policy and complaints are priority when these are received.

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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	Complaints policy	We have a single complaints policy
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	No	Policy section 4	Currently our policy has a section for minor complaints. We will review the policy and remove this section.
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	Policy Sections 5 and 6	We have a two stage complaints 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.	N/a	Not applicable	Not applicable

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5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Policy section 1.2	We handle complaints in line with the code
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	Policy sections 5.3 and 6.2	We always acknowledge a complaint by setting out the complaint and the outcomes sought. We also ask for clarification if needed.
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	Policy sections 5.3 and 6.2	This is dealt with in our initial triage stage of acknowledging the complaint
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and	Yes	Policy sections 5 and 6	Policy is in the process of being updated

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	d. consider all relevant information and evidence carefully.			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Policy sections 5 and 6	We always notify a resident when it will take longer to process their complaint and agree a timescale with them.
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	Policy section 3	We will make reasonable adjustments where appropriate.
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	Policy section 2	We set out what complaints we will not consider.
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	Yes	Complaints log	We will keep a complaints log for any complaints that are received.

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	any relevant supporting documentation such as reports or surveys.			
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	Policy Sections 5 and 6	
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	Section 7.2 Anti-social behaviour policy	We have an anti-social behaviour policy for dealing with residents.
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	Anti-social behaviour policy	Refer to anti-social behaviour 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	Policy section 5.3	We assess the complaint in the triage stage to determine complexity, vulnerability etc to ensure it can be resolved promptly.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received</u> .	Yes	Policy section 5.3	We will acknowledge and log any complaint within 5 working days
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Policy section 5.4	We will ensure a full response is given within 10 working days of the complaint being acknowledged.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Policy section 5.4	We aim to resolve any complaint as soon as possible. If this is not

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	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.			possible within the 10 working days we will notify the resident clearly about why this is the case.
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.	No	Complaints policy	We will update the complaints policy to reflect this.
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	Policy section 5.11	We strive to provide a response to a complaint as soon as possible and do not delay based on outstanding actions.
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	Policy section 5.12	
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	Yes	Policy section 5.13	

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	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: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Policy section 5.12	These points are all addressed as part of 5.12 a) however, we will update this section to include a-g specifically.

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	Policy section 6	Stage two is the final response. Residents can progress to stage 2 if they are not satisfied.
6.11	Requests for stage 2 must be acknowledged, defined and logged at	Yes	Policy section 6.2	

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	stage 2 of the complaints procedure within five 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	Policy sections 6.2 to 6.4	We only ask for clarification where this is required. Otherwise the complaint is reviewed by an independent person using the information already received.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Policy section 6.2	The Appeals officer will deal with stage two complaints.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Policy section 6.4	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Policy section 6.5	If we believe the complaint will take longer to resolve, we will inform the resident and provide an updated timescale and the reasons for this.
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	Policy section 6.5	
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Policy section 5.11	As soon as a complaint response is completed this

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	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.			will be provided to the resident.
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	Policy section 6.6	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Policy section 6.6	These are provided as part of the procedure in 6.6 a). However, we will update our policy to reflect the list of items which must be included from a – g.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Policy section 6.3	The appeals officer is assisted by one or more trustees in order to issue a final response.

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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	No	Almshouse association have a new model policy and this will be adopted as soon as possible.	Almshouse association have a new model policy and this will be adopted as soon as possible..
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	No	Almshouse association have a new model policy and this will be adopted as soon as possible.	Almshouse association have a new model policy and this will be adopted as soon as possible.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	No	Almshouse association have a new model policy and this will be adopted as soon as possible.	Almshouse association have a new model policy

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	appropriate. Any remedy proposed must be followed through to completion.			and this will be adopted as soon as possible.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	No	Almshouse association have a new model policy, and this will be adopted as soon as possible.	Almshouse association have a new model policy and this will be adopted as soon as possible.

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: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Provided	Provided

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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.	No		Once the report has been completed this will be provided to the governing body.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/a		N/a this year
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/a		We will comply with any request to review and update the self-assessment
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.	N/a		N/a this year

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaints are discussed at trustee meetings	Complaints are discussed at trustee meetings.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaints are discussed at trustee meetings	Complaints are discussed at trustee meetings
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	Completed required reports	Completed required reports
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	Appointed person is clerk to the trustees	They are the most senior person within the team.

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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	Appointed person is the clerk to the trustees.	Appointed person is the clerk to the trustees
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	Any complaints are discussed at trustee meetings.	Any complaints are discussed at trustee meetings.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	Yes	Any complaints are discussed at trustee meetings.	Moving forward, complaints will be added as an agenda item even if there have been no complaints.

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	d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Complaints Policy Trustee meetings	Latest trustee minutes show that the trustees are eager to ensure all service requests are dealt with to prevent complaints and ensure our residents receive a good level of service.