

# Karibu Community Homes



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## Self-assessment – Complaint Handling Code

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	The definition of a complaint contained within our policy para 6 to 10.	The Housing Ombudsman definition is adopted clearly mirror our complaints definition in our overreaching policy.
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>This is covered in our definition of a complaint.</p> <p><i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Karibu, our staff, or those acting on our behalf, affecting an individual resident or group of residents'</i></p>	Our complaints publication and public awareness underpin how we record and responds to dissatisfaction of service raised by our customers, representative or a third party.
1.4	<p>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.</p>	YES	A service request and complaint are defined in the policy with examples given for each. Section 8 Complaint Policy page 3	Our complaint policy clearly defined service request and this is recorded and monitored regularly. Our complaint policy also includes a flowchart of service request.

1.5	<p>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.</p>	YES	<p>The Karibu complaints policy sets out the definition of what a complaint is in line with the HOS requirement. Section 9 Complaint Policy</p>	<p>The adoption of the Housing Ombudsman Service (HOS) complaints definition enables us to record dissatisfaction with a response to a service request as a complaint. Where a resident wishes to pursue a complaint, this will be formally logged and acknowledged within five working days of receipt of a stage 1 complaint. No additional resolution stages will be required prior to the complaint being formally logged.</p>
1.6	<p>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.</p>	YES	<p>All open comments from surveys are checked that indicate dissatisfaction or service failure with a view to engage rectify or offer the opportunity to complain. Section 10</p>	<p>We have an open and accessible route to complaint and use complaint as a tool to make service Improvement and overall complaint culture that seek redress and key learns.</p>

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	YES	This is set out in our policy with examples of when we will not consider a complaint. Section 13 page 4 sets out some examples of issues Karibu would not consider to be a complaint.	Our complaint policy clearly set out examples and clear exclusions, such as first-time request for service and first-time request for Anti-Social Behaviour reporting and intervention.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>	YES	<p>This is set out in our policy with examples of when we will not consider a complaint. Section 14 Complaints Policy.</p> <p>This also includes matters outside the jurisdiction of the Housing Ombudsman where other channels are more appropriate to the type of challenge (e.g. formal leasehold service charge challenge that is best heard via first tier tribunal)</p>	Our complaints policy clearly sets out exclusions, including time limits on the issues that may be considered. However, the policy also provides discretion to consider older issues in certain circumstances, such as where the complainant is vulnerable or where other exceptional circumstances apply
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	We will consider complaints on incidents that have happened within the last 12 months. This is captured in our complaints policy. Discretion is used for matters which fall outside of this timescale Section 15 Complaints Policy.	This is set out in our revised complaint policy with clear define expression of discretion if the complaints are outside the 12-month threshold, e.g. is repeated issues.

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	In the rare cases of a complaint not being accepted a full reason is given in line with our policy section 20.	Policy is aligned to the specific HOS requirement.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	Each complaint is treated separately. Section 14 Complaint Policy.	Our policy requires that complaints are considered on merit and not to adopt a blanket approach to all complaints.

### 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	<p>Currently complaints can be made via the following channels:</p> <ul style="list-style-type: none"> <li>• Letter</li> <li>• Email</li> <li>• In person</li> <li>• Online form</li> <li>• Social media</li> <li>• Telephone</li> <li>• App</li> </ul> <p>We have a continuing process to update our main CRM system to capture any resident attributes that would require us to make adjustments in order to access the complaints process. Section 26 of the complaint policy.</p>	Reasonable adjustment is contained in our complaint policy including the protected characteristic under the Equality Act 2010. Section 5 Complaint Policy
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	All staff are able to accept complaints and pass them on to the complaint coordinator to process record and respond to in line with the policy.	Housing Ombudsman eLearning training is provided to frontline staff to ensure complaints awareness and expectation across the service.

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	There are no targets in Karibu Community Homes for the number of complaints received and the volume of complaints is reported monthly to leadership teams and quarterly to Board and Customer Committee. The nature of the complaints, stage of resolution and what we have learnt provides essential insight	Our policy is set out to encourage complaints and complaints feedback is reviewed to drive necessary service improvement.
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	The complaints policy is provided on our website and can be printed and sent in the post should this be required. The document can be downloaded, font increased and translated into different languages, text talk and if needed into Braille, section 28 of our policy	Our policy seeks to promote inclusivity, by adopting plain language, translation and providing the policy in different format that aim at protected characteristics.
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	The policy outlines the complaints handling code will be published on our website alongside the complaints policy Section 29 Complaint Policy.	Our policy contains information about the Housing Ombudsman service and clearly set out how complaints details are published. Link to website <a href="#">Service request &amp; formal complaint Karibu Community Homes</a>
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	Subject to the relevant authority from the resident, we will accept and engage with their chosen representative. We have cases of working with partner agencies such as support workers when residents have requested.	Our Policy caters for representation on complaints through a nominated authority by a customer. Complaint Policy section 23.

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	Full information is provided on our website <a href="#">Our performance :: Karibu Community Homes</a> and the Housing Ombudsman contact details are provided in the response letters at stage 1 & 2	This is set out in the policy document Complaint Policy Section 29 and is repeated in stage responses.
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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	The Director of Customers and Communities is the senior complaints officer who provides periodical reports to committees and board. We also have an Assistant Director of Housing Services who oversees the performance and quality of complaint responses as well as a dedicated complaints officer.	A dedicated Complaints Officer role is embedded within Karibu's staff structure. The officer is responsible for managing the Housing Ombudsman Portal, including liaison and correspondence. This function is overseen by the Assistant Director of Housing. The Tenants' Committee, Customer Committee and Board receive quarterly reports on complaints performance.

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	We are a small organisation with circa 40 staff and a dedicated Complaints Officer who works across all teams. The Complaints Officer meets weekly with staff to review and manage complaints. They have access to all levels of staff to help resolve issues quickly and fairly. They also have the authority to make decisions and take action to resolve complaints without delay	Weekly meetings are held, with updates recorded and follow-up discussions undertaken as required. The Complaints Officer is empowered to make decisions and take action to resolve disputes fairly and promptly.
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	Training and coaching for key staff have been undertaken. All relevant staff have undertaken online Ombudsman modules on dispute resolution and a further 5 modules from the new e coaching platform which will be built into staff training this year as well as during induction. The platform also provides access to the Housing Ombudsman spotlight reports to enhance learning	New Ombudsman e-learning and coaching modules in training plan for 2025-2026 for key staff training this year.

### 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	A single complaints policy aligned to the updated handling code is in force and each complainant is treated with respect is available for all residents via the website or hard copy's can be sent in required formats	A single complaint policy is adopted and covered by the HOS code.

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	We have adopted the handling code requirement of a 2-stage process	We have a 2-stage approach to complaints (stage 1 & 2).
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	We have adopted the handling code requirement of a 2-stage process	Policy only embedded 2 stage approach
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	Where a service is delivered by a third party on Karibu's behalf, Karibu will consider complaints about how that service has been delivered and/or managed. Karibu operates a single complaints policy and residents are not required to complete a separate contractor complaints process before accessing Karibu's two-stage procedure.	Karibu remains responsible for complaints about services delivered on its behalf. Information may be sought from contractors or managing agents as part of the investigation, but the complaint remains within Karibu's two-stage process in line with the Code.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	Complaints Policy section 19 confirms Karibu will consider complaints about services delivered on its behalf.	Karibu remains accountable for complaint handling where services are delivered by contractors or other third parties. Karibu may obtain evidence from those parties, but residents access one complaints process through Karibu.
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	Under time scale for resolution of the complaint policy, when a complaint is logged, we ensure the resident is given the opportunity to set their expectation. A clear response letter designed to set out the various elements of the complaint and answer each in order to provide a comprehensive reply.	Our complaints policy seeks to give the complainant an opportunity to get their comment before the full response.
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	This forms part of our approach under the complaint policy. When acknowledging a complaint, we set out what we will investigate and respond to. Any parts that do not fall within our remit will be identified with reasons as to why we will not consider.	Where appropriate, we will engage with the customer to ensure clarity on issues complaints and engage in a dialogue with the complainant to establish alternative solutions to issues not within the policy

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits, act independently, and have an open mind.</li> <li>• give the resident a fair chance to set out their position.</li> <li>• take measures to address any actual or perceived conflict of interest; and</li> <li>• consider all relevant information and evidence carefully.</li> </ul>	YES	Complaints Policy commits Karibu to handling complaints fairly, impartially, objectively and professionally; residents are given the opportunity to set out their position before a final decision is made; and stage 2 is considered by a different officer from stage 1.	Karibu’s approach is to consider complaints on their merits, with an open mind and with due regard to fairness and impartiality. To strengthen explicit alignment with the Code, the policy will be updated at next review to state that actual or perceived conflicts of interest will be identified and managed.
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	If the initial timescale has to be extended the resident will be notified in line with the Complaint Policy section 48 with the reason why complete with a new date for reply.	Our policy and culture of openness will seek to address matters as quickly as possible, whenever this is not achievable clear and timely communications will be adopted at all times.
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	Under the complaint policy section 28 our policy is that we “Treat all people fairly, sensitively and with respect, and take into account the needs of anyone protected by the Equality Act 2010” Under Section 22 We will provide additional support to customers if they have difficulty accessing our complaints service, in line with our Reasonable Adjustments Policy. This may include providing information in appropriate alternative formats, text relay, interpreter service if needed or a	All major vulnerabilities are captured in the Housing Management system and are updated as required this allows Karibu services to consider reasonable adjustments. We are currently undertaking a resident census survey to update all key resident attributes including protected characteristics. Our external contractors also ask triage questions to identify any

			<p>home visit. Any complaint where we need to have regard under the Equality Act will be built into the resolution and where appropriate, notes made, and flags engaged that indicate special resident attributes.</p>	<p>changes to tenants needs and update our records.</p>
5.11	<p>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.</p>	YES	<p>Our complaints policy sets out our escalation to the next stage. Karibu will not refuse escalation unless there is a valid Code-compliant reason, and any refusal will be explained in writing.</p>	<p>Our policy clearly set out reasons for refusing complaint escalation. Karibu will not refuse escalation unless there is a valid Code-compliant reason, and any refusal will be explained in writing.</p>

5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	YES	All complaint activity (dates stages, notes actions etc) is held in the new complaints' module in CRM. There is a link to the tenancy screens as well as relevant documents and letter files in SharePoint	Our CRM enables us to keep full audit of complaints including tracking of communication and actions.
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	Our focus is to resolve as early as possible, and this is measured to ensure we are taking the right approach to dispute resolution- The complaint officer and Senior Leaders work in line with relevant policies and compensation policy guidelines for early resolutions. Section 53 our policy	Our approach to complaint shapes our complaint culture which seek to provide quick and swift resolution in any given opportunity.
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	Paragraph 30 & 31 Complaint Policy sets out our position for managing unacceptable behaviour, and provides detail of restrictions such as a single point of contact can be invoked should we consider this appropriate, being clear with the complainant as to the reasons and relevant arrangements	Our compliant policy clearly set out unreasonable behaviour and examples are highlighted in the 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	Any resident subject to restrictions on contact will be checked for considerations under the Equality Act 2010 . We will work to provide alternative solutions and will not include a complete ban. Information will be updated via our CRM system	Our policy demonstrates fairness and continuous provision of service even when we invoke a single point of contact access under Equality Act 2010
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## Section 6: Complaints Stages

### Stage 1 complaints

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	Any complaints that are received are initially reviewed for immediate possible resolution. On more complex cases that need investigation, the involvement of partners or vulnerability factors need to be taken into account a plan is agreed with the resident	The policy seeks quick redress on all complaints; however, we recognise that time is needed for more complex cases and will ensure effective communication throughout.
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	We seek to acknowledge all complaints within 5 days of receipt we are working on improving areas where we may not have met the 5 working days. Areas which impacted this was staff turnover in the service area and training of new complaint coordinator.	Our policy clearly defines this timeline which is part of our KPI and reporting. We are working on improvements to all key communication channels to ensure we capture complaints and acknowledge them quicker
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	Where possible a full response is provided within 10 days of acknowledgement where this is not possible and further time is needed, we have aim to contact the resident and advise the new timescales	Further work is in progress to ensure complaints are being resolved quickly through weekly complaint meetings, improving communication channels to ensure complaints are picked up and logged quickly.

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the	Partial, further improvements required	Where possible a full response is provided within 10 days of acknowledgement where this is not	Training and HO eLearning has been in place to reduce timescales and continue to
	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	possible, we aim to complete the extension within the further 10 working days, this is confirmed with the resident with reasons why. There have been cases which have exceeded this timeframe, and apologies and compensation have been part of the redress	improve the handling of the complaint
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	Contact details for the Housing Ombudsman is provided at each stage of a complaint	Set out in our policy
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.	Partial	A response is provided when we have a plan of action to address each element of the complaint even if the actions haven't completed by the time of the letter back to the resident. On occasion if the resident is not happy to close a complaint without completion of works, we will work with the resident. Further development on the CRM system allows for actions to be added to complaints for tracking from April 25	Plan of action will clearly set out in the complaint response including any relevant remediation as well as compensation, apology and lessons learned.

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	When responding to complaints our letter will set out each part of the complaint and a response is provided to each element	Our complaint response will clearly set out a response to all issues raised in the complaint. Giving guide to the relevant policies and procedures.
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	YES	We will seek to capture additional complaints should they be made during investigation and provide a comprehensive response. Any new unconnected issues raised will be	Issues unrelated to the original complaint are set out in our policy. However, we will seek to address all issues by giving the opportunity to the

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.		captured, and a new complaint raised where appropriate	complainant to include all related issues during the stage 1 response.
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"> <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 matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	YES	These elements have been incorporated as part of our letter structure when responding to formal complaints	Our policy set out the expectation in responding to complaints.

## Stage 2 complaints

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	The escalation process and timescales are made clear as part of our stage 1 letter response	This clearly set out in our complaint policy
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Partial	Request to escalate to stage 2 are recorded and acknowledged within 5 days once a resident informs us, they wish to escalate they proceed through the stage 2 process on the CRM system. Some have not met the 5 working day timescales as above with stage 1.	Stage 2 process and expectation is clearly defined and set out in our policy and recorded on our CRM system to track. Further improvement work is ongoing to ensure all complaints meet timescales
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	If a resident escalates to stage 2 and it's not clear why, contact is made to ascertain what resolution is being sought that a stage 1 response did not provide	Our stage 2 process seek to address why stage 1 has not reached a satisfactory outcome.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	A separate lead manager for stage two is selected to investigate and escalated complaint this person is part of the senior leadership	This is set out in our policy. Stage 2 will be addressed by a senior person unconnected to the stage 1 response.

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	Responses are due in 20 days unless the complainant has been contacted to extend giving clear reasons and a new date for reply. There have been occasions where extensions have been required to resolve complex cases.	This is set out in our policy however in a small number of cases the target response time was not met this year. Regular case reviews, an improved computer system and a more settled team will ensure better performance going forward.
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	Responses at stage 2 are due in 20 working days unless the complainant has been contacted to extend giving clear reasons and a new date for reply.	Our policy seeks to adhere to the timeline; however, any extension will seek to reach an agreement with the complainant.
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	On all stages the housing ombudsman's details are provided in writing to the complainant	The Ombudsman details are clearly visible in all stages including our policy document.
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	The complaint responses contain both the planned actions and those which have already been completed where relevant and updates provided for those activities over a longer timeframe.	Our policy document seeks to ensure clear agreed action to redress.

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	In the vast majority of cases the complaint elements will be addressed and for those that fall outside of this process, an explanation is provided in writing.	The overarching aim to address all issues raised in a complaint with relevant reference to the law and other relevant documents.
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	Our letters follow this structure in order to provide consistency and a comprehensive response	This is set out in our policy document.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	YES	The responder at stage 2 is considered by a senior staff unconnected to the stage 1 response to provide a final opportunity to resolve a dispute.	Our stage 2 process will involve a senior member who was unconnected to the initial stage and will seek to reach a satisfactory outcome for the complainant.

## 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>• Acting if there has been delay.</li> <li>• Reconsidering or changing a decision.</li> <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>	YES	All complaints provide an opportunity to review our policies and processes to ensure there isn't a repeat of an issue going forward. If we establish that we are at fault, then we will put things right and seek to learn for the complaint full compensation policy along with key policies are used as guidance and reference.	Our policy sets out openness, transparency and fairness and will acknowledge and promote these throughout the complaint process. Resident service plan , along with complaint reporting quarterly and You Said We Did provide information of changes from resident feedback across all channels available for our residents to review on our website.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	We take a fair and proportionate approach to dispute resolution recognising any detriment suffered vs appropriate use of social rent	Openness and fairness underpin our policy and will seek to ensure a remedy that reflect the service failure.
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	Remedies to resolve all elements of a complaint will have a clear indication of what the resident can expect and when.	The policy seeks to agree remedies reach an agreement by both parties and set a realistic time for completing actions.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	Remedy guidance by the Housing Ombudsman is referred to when deciding resolution options in more complex cases	This is in line with our adoption of the Housing Ombudsman best practices.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol>	YES	<p>Each year to date we have published our self-assessment on our website. The new requirements will be met by providing additional information including.</p> <ul style="list-style-type: none"> <li>A full complaint performance report</li> <li>Performance improvement report</li> <li>Any specific Ombudsman reports</li> <li>Ombudsman annual landlords report</li> </ul>	<p>The Board approve our annual self-assessment on September prior to publishing</p> <p>We provide complaint quarterly performance reports to board and to residents</p> <p>We provide "you said we did " improvements</p> <p>Regular reporting to the Tenant Committee, Complaint Panel, Customer Committees and Member Responsible for Complaints along with tenant committees is in place</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>The annual report is presented to the governing body and its response also published on our website</p>	<p>Our improvement plan will have board oversight as well committee oversight and will be accessible via website and other mediums including tenants Portal</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	This self-assessment was completed in July 2024 following a merger and continues	This is best practice and will be continued going forward
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	If requested to review after an investigation this will be completed	This will be actioned as part of any recommendation from the HOS. This review was requested by the Housing Ombudsman as a result of recent engagement undertaken as part of a policy review process.
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	The current policy does not expressly set out the process for notifying the Ombudsman and residents, publishing temporary non-compliance, and stating a timescale for return to compliance in exceptional circumstances will be part of Karibu communication strategy in dealing with cyber incident.	The policy will be updated to include express provision for exceptional circumstances, including notification to the Ombudsman, communication to affected residents, website publication where relevant, and a clear timescale for return to compliance. However, this is part of the overall improvement on the policy and strengthening pf the associated communication.

## 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	We take the opportunity to review what, if any, changes need to be made after complaints. Key changes this year include, increased communications, new repairs contractor and service personnel	Annual complaint assessment will seek to include the necessary service improvements
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	Opportunities are taken to learn from complaints and make major and incremental changes to help improve services. Evidence includes major changes to repairs service, complaint management and access to services	Karibu Community Homes welcome complaint as means of identify areas that requires service oversight and improvement.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	YES	Complaints performance reports and presentations are provided to Tenants Committee, Customer Committee and Board.	Our complaints policy offers extra layer of accountability and transparency and seek to involve residents panel into the complaint process without adding extra filter to our stage 2 process.
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 Customer and Communities oversee performance on complaints. Assistant Director of Housing also oversees complaints performance and redress.	Complaints performance forms part of leadership discussion including themes, trends and learning from 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 Chair of our Customer Committee and board member has been appointed MRC	MRC role has been defined and included in the Chair of the Customer Committee who is also an independent Board member.
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	MRC has direct access to the organisation via the senior complaints officer.	This is defined in the role of MRC
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 d. annual complaints performance and service improvement report.	YES	The governing body receives performance reports on complaints performance, lessons learned as well as any ombudsman determinations.	The board, committees, and wider residents receive updated performance reports quarterly and annually at meetings and via our website.  MRC meetings with management and staff periodically to discuss complaints performance and trends and to help develop a more effective culture around complaints and resolution.

9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"><li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li><li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li><li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li></ul>	Partial Compliant	<p>Karibu expects all relevant employees and third parties to work collaboratively to resolve complaints, take collective responsibility for service failures, and engage professionally with complaint handling. This will be further embedded through operational guidance, staff training and contractor management arrangements.</p>	<p>Karibu will formalise this through staff objectives, induction/training, contractor management arrangements and complaint handling guidance so that all relevant employees and third parties are expected to work collaboratively, take collective responsibility for service failures, and engage with complaints professionally.</p>
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