

Housing Ombudsman Self-Assessment – Curo March 2025

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Considered documents: Curo Complaints Policy V8 July 2024 and Curo Complaints Procedure V6 July 2024

Foreword: The following self-assessment has been completed for submission to our governing body. It considers our compliance with the provisions of the Complaint Handling Code (April 2024) as per the current policy and procedure, with additional commentary provided on proposed changes following approval of the Complaints Pilot model, further detail on which is available in the accompanying Complaints Performance and Service Improvement Report. Fundamentally, this new model will involve complaints being directly managed by managers within the appropriate team, rather than by a centralised complaints team (which will stick exist as a governance function to ensure compliance and promote robust data-driven learning). It is anticipated that these proposed changes will warrant a full review of our Complaints Policy and Procedure, and we will complete an Equality Impact Assessment and further Self-Assessment as part of this process.

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>	Y	Point 2.2 of Complaints Policy Point 2 of Complaints Procedure	We use the Housing Ombudsman's definition in both our published policy and internal procedure.
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	Y	Points 1.3, 2.2 and 5.3 of Complaints Policy Point 1.6 of Complaints Procedure	We accept complaints logged by third parties. We have a system by-which residents can give a

	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.			representative tiered level of access and permissions to their account, which includes making and discussing complaints. This information is available for colleagues on our CRM and central document management systems.
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.	Y	Point 2.2 Complaints Policy	<p>Following issue of the Complaints Handling Code in April 2024, we contacted the Housing Ombudsman to get greater understanding of how this principle is applied.</p> <p>We consequently issued guidance to colleagues in our Customer Contact Team, who receive a majority of contact from our residents, and deliver training for new starters on the difference between a service request and a complaint.</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service	Y	Point 2.2 of Complaints Policy	Complaints are raised as their own workflow contacts. Any workflows or relevant orders which may

	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.			have given rise to the complaint will continue to be progressed as per our normal processes and obligations as the landlord.
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.	Y	Points 1.2 and 1.4 of Complaints Policy	<p>These points outline our commitment to valuing resident's feedback with respect to expressions of dissatisfaction and our handling of any consequent complaints.</p> <p>Our website features a feedback page, where residents can make compliments, suggestions or complaints.</p> <p>All survey responses sent through our main contact channels are sent to the relevant business area for review.</p> <p>Any responses which express dissatisfaction are reviewed by a manager and where appropriate the resident is contacted to discuss their experience and address the issue. If</p>

				the resident remains dissatisfied, this will be progressed as a complaint.
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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.	Y	Points 6.3, 6.6 and 6.7 of Complaints Policy	<p>The circumstances in which we will not accept a complaint are based on the Housing Ombudsman's guidance and are outlined in the policy.</p> <p>If we decide not to accept a complaint, we will provide the customer with our reasoning for doing so and signpost the resident to the Housing Ombudsman to assess whether our reasoning is valid.</p> <p>We intend to strengthen this provision in roll-out by changing the complaints workflow to include an outcome where we refuse the complaint, which will</p>

				<p>generate a template letter to be sent to the resident.</p> <p>At present, these refusals are generally sent via email from the Complaints inbox, rather than in formal correspondence, so there is scope to improve our procedure in this regard. The proposed changes would provide informed data on the volumes of complaints we refuse and support the appropriate application of our Acceptable Behaviour Policy for unreasonable complainants.</p>
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"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the 	Y	As per provision 2.2.	As per provision 2.2.

	<p>claim, such as the Claim Form and Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy. 			
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>	Y	As per provision 2.2.	As per provision 2.2.
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>	Y	As per provision 2.2.	As per provision 2.2.

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Points 5.2, 5.5 and 6.3 of complaint policy	<p>We consider each complaint on its own merit, with respect to the individual circumstances of the resident. This focus on fairness aligns with the core values of Curo (CROFT) and the Housing Ombudsman.</p> <p>We complete Equality Impact Assessments for any policy/procedures which have an impact on residents, including our complaints policy. These ensure these processes can accommodate protected characteristics and reasonable adjustments.</p>
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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	Y	Point 5.3 of Complaints Policy Point 1.6 of Complaints Procedure	We have numerous channels of communication by which residents can raise complaints which are outlined in the referenced

	under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.		<p>Complaints can be made to Curo through the following channels:</p> <ul style="list-style-type: none"> • Letter • Email • The Curo website • The 'MyCuro' online portal. • Face to face (including attending our office's reception) • Telephone • WhatsApp • SMS • Online Chat • Social media <p>Website link:</p> <p>https://www.curo-group.co.uk/contact-us/feedback/complaints/</p>	<p>points. Our website's complaints section offers a convenient web form and information on our other complaint channels. There is also the option to request alternative formats like large print, audio, Braille, multilingual options, sign languages, and live interpretation services.</p> <p>An Equality Impact Assessment has been conducted on our complaints policy and procedure to ensure our ability to respond effectively by accommodating adaptations and reasonable adjustments. Further, during 2023/24, all Curo colleagues received training on the Equality Act 2010.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the	Y	Colleague training and information on colleague intranet (the Orb).	Complaints training is incorporated into every induction, ensuring new colleagues are equipped with the necessary skills.

	complaint to the appropriate person within the landlord.			Our complaint policy and procedure are available on our colleague intranet called the Orb.
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.	Y	Points 1.2 and 1.4 of Complaints Policy.	We are hyper-vigilant of capturing complaints data by signposting any residents who are dissatisfied to our complaints process as per the universal definition outlined in provision 1.2. As a result, we receive a higher volume of complaints compared to other housing associations of a similar size.
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.	Y	As per provision 2.1.	As per provision 2.1.
3.5	The policy must explain how the landlord will publicise details of the	Y	Points 1.6 and 1.7 of Complaints Policy.	These points provide links to the Complaints page of our website, where they can find our policy, self-

	complaints policy, including information about the Ombudsman and this Code.			assessment and annual service improvement report with a response from the Board, and the Housing Ombudsman's website.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Y	As per provision 1.3.	As per provision 1.3.
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.	Y	Point 1.7 of Complaints Policy and mail merge template letters for formal complaint correspondence.	We process complaints via a CRM system workflow, actions of which generate template letters for formal complaint correspondence. These letters all include contact information for the Housing Ombudsman to ensure this provision is consistently applied.

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	Y	Customer Resolution Team Point 4.3 of Complaints Policy	We have a centralised complaints team called the Customer Resolution

	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.			<p>Team. The Customer Resolution Manager is responsible for reporting on complaint activity.</p> <p>We have also introduced a new role (Housing Ombudsman and Complaint Reporting Lead) to manage all correspondence and reporting relating to the Housing Ombudsman.</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.	Y	Customer Resolution Team	<p>Our Customer Resolution team have delegated authority to award financial redress and are encouraged to be unbiased and fair in their assessment of a resident's case.</p> <p>Under the current model, our Customer Resolution team will then assign complaint-related tasks to relevant colleagues via contact actions.</p> <p>In the proposed new model, complaints will be managed by managers, dependent on the cause of</p>

				the complaint and what the complainant is seeking as a resolution. These managers will inherently have more remit to offer remedies within their service area and bring complaints to faster resolutions.
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.	Y	New 'ten-year' vision and company strategic plan	<p>In 2023/24, we refreshed our corporate strategy with the vision that by 2034 'Everyone feels proud of the quality of our homes'. This vision was based on feedback from colleagues and residents.</p> <p>To deliver this vision, we have implemented five strategic objectives, two of which are relevant to this provision: Trusted Customer Services and Solid Foundations.</p> <p>By having colleagues throughout the business manage complaints, we intend to embed a positive complaints culture and</p>

				<p>equip all customer-facing colleagues with the necessary training to feel confident in managing complaints.</p> <p>Under the proposed Pilot changes, the centralised complaints team will move to Governance. They will support the process by completing quality assurance checks to ensure our compliance with the provisions of the Code and delivering data-driven learning to the operational teams to encourage service improvement.</p>
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents	Y	Points 2.1, 3.1 and 3.2 of Complaints Policy	This point outlines the scope of our complaints policy – it is applicable to anyone who makes a complaint about Curo or anyone working on its

	must not be treated differently if they complain.			behalf, with the exception of Curo Enterprise who maintain their own 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.	Y	Complaints Policy and Procedure	Our policy and procedure outline that we use a formal two-stage complaints procedure.
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.	Y	Point 4.5. of Complaints Policy	Further to provision 5.2, this point is explicit that we will signpost residents to the Housing Ombudsman when a matter has exhausted our internal procedure.
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.	Y	Points 3.3 and 4.8 of Complaints Policy Point 3.1.c. of Complaints Procedure	These points are clear that complaints against contractors acting on our behalf will be addressed by Curo. I note that our processes state that complaints about a contractor's conduct will be managed in a single stage by the

				contract manager. I believe the application of this has been inconsistent and as part of the forthcoming Pilot roll-out these complaints will be managed as two-stage.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	As per provision 5.4.	As per provision 5.4, complaints of this nature are handled internally by Curo.
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.	Y	As per provision 3.7.	Refer to provision 3.7 regarding generated letter templates, which include a section of bullet points for confirming our understanding of the complaint's subject.
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.	Y	As per provision 5.6.	As per provision 5.6.
5.8	At each stage of the complaints process, complaint handlers must:	Y	Point 5.5 and 6.5 of Complaints Policy	These points outline how our complaints culture reflects aligns with our

	<ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 		Points 1.4 and 3.2 of Complaints Procedure	core values of Curo (CROFT) and how we expect these values to be reflected in the duties of complaint handlers.
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.	Y	Point 6.1 of Complaints Policy Points 4.2.1 and 5.2.1 of Complaints Procedure	If we are unable to provide a comprehensive response to a complaint within 10 working days at Stage 1 or 20 working days at Stage 2, we will notify the resident's that we require an extension and explain why we feel one is necessary.
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	Y	Point 5.2 of Complaints Policy	<p>This point is clear that we will consider each complaint on its own merit.</p> <p>Our CRM system allows us to record residents' disabilities, vulnerabilities</p>

	<p>disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>			<p>and reasonable adjustments. Collection of this data is part of our Customer Contact Team's standard scripts.</p> <p>When a complaint is logged on our CRM system, we complete a triage to assess whether the impact of an issue is being exacerbated by the resident's individual circumstances.</p> <p>As above, all Curo colleagues received training on the Equality Act (including reasonable adjustments) during 2023/24. We have also completed an Equality Impact Assessment to ensure we are equipped to respond suitably and that our policies accommodate adaptations and reasonable adjustments.</p> <p>With respect to roll-out, the Complaints & Improvement Specialist role would be responsible</p>
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				for the triage of any new complaints submissions. The proposal is that this triage is completed on a form which is then saved to M-Files and sent to the allocated manager. Any disabilities, vulnerabilities, communications requirements or reasonable adjustments would be clearly recorded on this form to provide the manager with this information in a readable and accessible format, as we are aware that different teams use our CRM system in different ways and this data is not always immediately apparent to them.
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.	Y	Section 6 of the Complaints Policy	Formerly, complaints which concerned a policy were managed at a single stage by the policy holder. However, after seeking further guidance from the Housing Ombudsman, this provision was removed.

				<p>All complaints are now processed in a two-stage process, excluding complaints regarding the conduct of an individual colleague.</p> <p>Under the proposed changes of the Pilot model, complaints regarding staff conduct will be given a second stage, with escalation to the responsible director.</p> <p>Refer to provision 2.1 regarding circumstances in which we will refuse a complaint.</p>
5.12	<p>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.</p>	Y	QL and M-Files	<p>Complaints are logged as contact workflows on our CRM system. These contacts include a section for complaint handlers to leave notes.</p> <p>All our documents are saved to M-Files, a centralised document management system against the resident's tenancy or property. It is</p>

				possible to save documents against the complaint contact reference, providing a centralised repository for pertinent correspondence and evidence which can be accessed by searching for the complaint reference.
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.	Y	Section 6 of Complaints Policy.	<p>We recognise that for most complainants having their problem heard and acted on as quickly as possible is important. This is reflected in us acknowledging Stage 1 complaints within 3 working days, which is beyond our obligations under the Code, and issuing a response within 10 working days rather than the 20 for a Stage 2 response.</p> <p>Within our two-stage process, a majority of complaints are resolve at Stage 1, with Stage 2 providing an opportunity for any reasoning to be reconsidered and a more detailed review of</p>

				longstanding or complicated complaints.
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.	Y	Points 2.4 and 6.4 of Complaints Policy Section 14 of Complaints Procedure	<p>We have an Acceptable Behaviour Policy. The referenced points/section outline qualifying circumstances for the application of this policy. Our policy and procedure has considered guidance published by the Housing Ombudsman, and also the Ombudsman's own policy on managing unreasonable behaviour.</p> <p>We will only impose restrictions for an appropriate period. In most cases restrictions will apply for between six and twelve months but in exceptional cases they may be imposed for longer. In such cases, the restrictions would be reviewed every six months.</p> <p>We will write to the customer after each review to explain the outcome. If the restriction</p>

				is to continue, we will explain why and provide the next review date.
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.		Acceptable Behaviour Policy	We are committed to fulfilling our obligations under the Equality Act 2010. Specifically, for customers with disabilities, we will implement reasonable adjustments, which may include accommodating behaviour that would normally trigger restrictions to be placed on contact. Should an individual with a protected characteristic be subject to a restriction under this policy, we will assess whether the restriction may disproportionately impact them compared to someone without that characteristic. If so, we will explore alternative arrangements to ensure continued access to our services.

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.	Y	Section 3.2 of Complaints Procedure.	<p>These points are outlined in the section explaining the duties of the complaint case manager.</p> <p>Repairs related to complaints can be marked as such on DRS, our scheduling system. Where appropriate, managers in our Property Maintenance team may be able to offer overtime attendances on weekends to complete repairs.</p> <p>As per provision 5.13, we recognise that for most complainants having their problem heard and acted on as quickly as possible is important. This is reflected in our accelerated time scale for Stage 1 complaints.</p> <p>In the roll-out changes, we will be implementing a</p>

				<p>new system of triage when a new complaint submission is received. This would be completed by the new Complaints & Improvement Specialist role. The proposed triage includes a section for recording EDI data, as well as two new classifications for complaints – complex and high risk. The proposal is to report on these complaints to relevant directors so they are aware of higher risk complaints within their service area. The framework for determining the risk of complaints has been informed by the risk framework used by our Assurance team, to ensure internal consistency.</p> <p>Within the Pilot, we have also focused on accelerating our outbound contact to complainants once a new submission has been received, giving the complainant the opportunity to voice their</p>
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				concerns to an appropriate manager. In doing so, we can catch complaints where an early intervention is possible and appropriate – in some instances, the complainant simply wants to be heard and a timely apology from a relevant manager can bring the issue to a resolution.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Y	Section 6.1 of Complaints Policy Section 4.2.1 of Complaints Procedure	No commentary – explicit.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Y	Section 6.1 of Complaints Policy Section 4.2.1 of Complaints Procedure	No commentary – explicit.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of	Y	Section 6.1 of Complaints Policy Sections 4.2.1 and 5.2.1 of the Complaints Procedure	If we are unable to issue an adequate response, we will notify the complainant that we need an extension

	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.			of 10 working days at Stage 1 or 20 working days at Stage 2.
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.	Y	Section 6.1 of Complaints Policy Sections 4.2.1 and 5.2.1 of the Complaints Procedure	We have a template letter for notifying complainants of an extension which includes the contact information for the Housing Ombudsman.
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.	Y	Section 6.1 of Complaints Policy Sections 4.2.1 and 5.2.1 of the Complaints Procedure	<p>We issue our formal Stage 1 and 2 responses in writing (unless the resident has specified an alternative contact preference). This letter details:</p> <ul style="list-style-type: none"> • The complaint reference number • Our understanding of the complaint • Our proposed resolution or remedy

				<ul style="list-style-type: none"> • Routes of escalation and appropriate signposting. • Link to the complaints policy on our website. • Contact information for the Housing Ombudsman.
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.	Y	MailMerge letter templates	<p>As above, our complaints workflow automatically generates template letters for formal correspondence.</p> <p>The template acknowledgment letter has a section for confirming our understanding of the complaint in bullet points, enabling the customer to confirm or clarify their concerns ahead of our formal response.</p> <p>Similarly, the template response letters reiterate these points, encouraging clarity by having the case manager respond to each point.</p>

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.	Y	Section 6.1 of Complaints Policy Sections 4.2.1 and 5.2.1 of the Complaints Procedure	<p>As per provision 6.7 with respect to additional concerns being raised between formal acknowledgement and response.</p> <p>Presently, our Customer Resolution team are responsible for monitoring the complaints inbox and raising (the majority of) new complaints on QL. In doing so, they will review existing complaints on the resident's account to prevent duplication.</p> <p>One of the Pilot's core principles was ease and we wanted to strive for a complaints process which is not an administrative burden to the resident, as we are aware that engaging in a complaints process is already an inconvenience.</p> <p>Consequently, we have been vigilant in preventing duplication and considering whether new complaint submissions about the same issue</p>
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				<p>constitute an escalation request.</p> <p>In the new model, these duties of the Customer Resolution team would be filled by the Complaints & Improvement Specialist role.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Y	As per provision 6.6.	As per provision 6.6.

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.	Y	Section 6.1 of Complaints Policy Points 4.2.4 and 5.1 of Complaints Procedure	No commentary – explicit.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Y	Section 6.1 of Complaints Policy Points 4.2.4 and 5.2.1 of complaints procedure	No commentary – explicit.
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.	Y	Section 6.1 of Complaints Policy	This section is explicit in that the resident is not obliged to give a reason for escalation. However, if they choose to provide reasons, these are documented in the contact notes for the awareness of the Stage 2 handler.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	Section 6.1 of Complaints Policy Sections 3.3 and 3.4 of Complaints Procedure	This practise is well embedded. The complaint contact workflow allows colleagues to see who has been responsible for actions in progressing the complaint and complaints

				are reallocated upon escalation to Stage 2.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Y	Section 6.1 of Complaints Policy Section 5.2.1 of Complaints Procedure	No commentary – explicit.
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.	Y	Section 6.1 of Complaints Policy Section 5.2.1 of Complaints Procedure	No commentary – explicit.
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.	Y	As per provision 6.5.	As per provision 6.5.
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	Y	Points 4.2.2, 4.2.3 and 5.2.2 of Complaints Procedure	These points detail how outstanding actions required to address the considered issue are monitored by responsible teams via contact actions.

	still be tracked and actioned promptly with appropriate updates 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.	Y	As per provision 6.7.	As per provision 6.7.
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.	Y	As per provision 6.6.	As per provision 6.6.
6.20		Y	Section 8 of Complaints Procedure	This is explicit in this section of the procedure.

	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.			Our Stage 2 response letter templates confirm that this is our final response to the matter and provide the resident with the contact information for the Housing Ombudsman. Due regard is also given to appropriate signposting depending on the circumstances (e.g. pursuing a claim through our insurers).
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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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; 	Y	Sections 1, 4.6 and 5 of Complaints Policy Points 1.1, 1.2, 4.2.2 and 15 of Complaints Procedure	These references outline how this provision is built into the principles of our complaints process. We also have a compensation policy and procedure which detail how compensation is calculated, and complaint handlers are expected to ensure that any

	<ul style="list-style-type: none"> • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			<p>compensation awarded as part of a complaint is consistent with its provisions.</p> <p>To prepare for the Pilot roll-out, we are in the process of developing a schedule of training for complaint handling colleagues, with specific guidance on the application of remedies as per the Housing Ombudsman's published guidance, and a detailed complaints manual which colleagues can use as a source of reference.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Point 5.8 of Complaints Policy	<p>As above, our compensation policy and procedure outlines how we award compensation to ensure consistency. We award 'time and impact' compensation by way of apology for service failure and this is calculated using a matrix, considering the length of time the resident has been affected and how severe the impact was with</p>

				<p>respect to any additional needs or extenuating circumstances.</p> <p>Following roll-out, operational leaders will have more delegated authority to offer remedies and we will be delivering additional training to support this.</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.	Y	Section 3.2 of Complaints Procedure	This is detailed in the reference section which concerns the duties of the case manager.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	Point 6.2 of Complaints Policy.	<p>We complete quality assurance of complaints based on the provisions of the Housing Ombudsman's Code.</p> <p>Our compensation policy and procedure is written in accordance with the Housing Ombudsman's published guidance, which will also be used to inform additional training and reference materials for</p>

				<p>complaint handlers as above.</p> <p>We continue to submit feedback and requests via the Housing Ombudsman's Centre for Learning on further guidance on awarding compensation.</p>
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types</p>	Y	Point 6.10 of Complaints Policy.	<p>Every year, we produce a Complaints Performance and Service Improvement report. This is published on our website and in a printable leaflet on request. The report includes:</p> <ul style="list-style-type: none"> The number, type and outcome of complaints.

	<p>of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			<ul style="list-style-type: none"> • What we've learnt from complaints. • What we've done as a result.
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.	Y	https://www.curo-group.co.uk/contact-us/feedback/complaints/	The annual report is presented to our Board whose response is also published on our website. The Board's response to the 2025 report will be published once they have considered and approved it.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	This document	Please refer to the foreword on page 1 regarding proposed changes to our complaints handling model

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	N/A	We are committed to compliance in the event this is requested.
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.	Y	Section 4.3 of the Customer Contact Team Business Continuity Plan V2.	'Disaster Actions – Detailed' – action 14 states: "If system outage is to be long term (more than 24 hrs) we must inform the Housing Ombudsman, provide information to residents who may be affected, and publish this on our website. Curo must provide a timescale for returning to compliance with the Code."

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made	Y	New 'ten-year' vision and company strategic plan	This is clear in our new Strategic Objective Trusted Customer Service, specifically the key goal 'Listen to customers, value

	as a result of any learning from the complaint.			<p>their feedback and support, and act on what we hear'.</p> <p>As above, under the proposed Pilot changes, the centralised complaints team will move to Governance. This team will be led by a 'Head of Complaints & Improvement', the title of which evidences our intention to marry complaints and service improvement.</p> <p>This team will also include a dedicate Complaints Data Analyst to focus exclusively on root cause analysis and patterns in our data, to be then shared with relevant service teams.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify	Y	<p>As per provision 4.3 with respect to culture</p> <p>As per provision 9.1 with respect to use of data</p>	<p>As per provision 4.3 with respect to culture</p> <p>As per provision 9.1 with respect to use of data</p>

	issues and introduce positive changes in service delivery.			
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.	Y	Point 6.2 of Complaints Policy Governing bodies	<p>We operate a resident feedback community called VoiceBox, managed by our dedicated Resident Engagement team. Within this, we operate a complaints review forum made up of residents who review anonymised complaints and feedback whether they feel we handled the complaint appropriately.</p> <p>Complaints performance is reported to our Customer Experience Committee who will, as appropriate, provide assurance to the Audit and Assurance Committee and/or the combined Board.</p> <p>The Audit and Assurance Committee will also review any complaint outcomes which may constitute a strategic business risk, such as adverse determinations from the</p>

				<p>Housing Ombudsman or potential compliance regulatory issues arising from the complaint, granting an additional layer of oversight and assurance.</p> <p>Internally, learning and performance discussions occur within teams on a daily, weekly, and monthly basis. Learnings may be ad-hoc in response to a specific case or based on data, supported by the Performance & Insight team, and disseminated through business cascade reports and leadership meetings.</p> <p>Please refer to provision 9.1 with respect to proposed changes under new model.</p>
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,	Y	Complaints Policy (page 1)	<p>Our Chief Customer Officer is the policy owner for complaints. The Director of Customer Contact has weekly meetings with the Chief</p>

	serious risks, or policies and procedures that require revision.			Customer Officer as the accountable lead.
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').	Y	A member of our board is the designated MRC	A member of our board is the designated MRC
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.	Y	Refer to provision 9.3.	Refer to provision 9.3.
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	Y	Refer to provision 9.3.	Refer to provision 9.3.

	<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>			
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>	Y	This is clear in 1.4 of the complaints policy.	<p>Refer to provision 9.1 with respect to wider culture piece. All colleagues are expected to set personal development objectives in line with the business' corporate strategy.</p> <p>Note that our Chief Customer Officer is also in the process of developing a customer service standard which outlines the level of service which residents can expect to receive when engaging with a colleague. This will consider feedback from</p>

				residents and colleagues, as well as the changes to the provisions of the Consumer Standards.
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