

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	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	This has been our definition of a complaint for several years and is set out as so in section 2.2 of our Complaints Policy, and section 2 of our Complaints Procedure.	The complaints policy is published on our website. Definition of complaints is also explained in our induction programme and in-house complaints training.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Y	This is included in section 2.2 and 5.3 of the complaints policy and section 1.6 of our complaints procedure.	This is part of our in-house training for our Customer Resolutions team, our Contact Team, and all managers in customer-facing roles. Third party permission is still needed to discuss the details of the complaint with a third party or representative after it has been logged.
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	Y	This is included in section 2.2 of our complaints policy	In instances where a resident has previously reported a situation without resolution, it will be categorised as a complaint. Conversely, if there

	be taken to put something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly.			have been no prior reports and this is the first instance of awareness, it will be treated as a service request. In such cases, we will provide the resident with an explanation for our chosen approach.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Y	This is included in section 2.2 of our complaints policy	We encourage customers to give feedback which includes logging a complaint and when they do, we'll listen, we'll try to resolve things quickly, and if we can't we'll explain why. These requirements are also made clear to colleagues in all of our complaints training.
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	Feedback from surveys that are sent from our main contact channels are provided to relevant business areas for review.	All survey responses which express dissatisfaction are reviewed by a manager and where appropriate the resident is contacted to discuss their experience. When possible, further action required to rectify a situation may then be pursued as a complaint.

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	Included in internal training for colleagues. Direction is also given in our complaints policy in sections 6.3 – 6.4 and 6.6 – 6.7.	If we decide not to accept a complaint, we will provide the customer with a summary of the reason, a copy of our policy and the details for the Housing Ombudsman should they wish to escalate this to them to review. Our policy and guidance on this is based on the Housing Ombudsman's guidance (for example, on managing unreasonable behaviour) and on its own policies (for example, its service complaints policy).
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 claim, such as 	Y	Sections 6.3, 6.4, 6.6 and 6.7 of the policy address this.	As above.

	<p>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	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.	Y	This is clear in section 6.3 of the policy.	We are mindful of our data protection obligations, and don't hold personal information for longer than we need to, so any complaint about things that happened 12 months or more ago may be more difficult to resolve.
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.	Y	This is clear in section 6.6 of the policy.	If we decide not to accept a complaint, we will provide the customer with a summary of the reason, a copy of our policy and the details for the Housing Ombudsman should they wish to escalate this to them to review.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	This is clear in section 6.3 of the policy.	Our goal is to carefully consider extenuating circumstances and the unique situation of each resident,

				<p>ensuring that we only exclude a case when it's truly appropriate to do so. This approach allows us to tailor our response to the specific needs and circumstances of the individual, promoting fairness and thoroughness in our complaints handling process.</p> <p>We have also completed an Equality Impact Assessment against our complaints policy and procedure to ensure we are equipped to respond suitably and that our policies do accommodate adaptations 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 under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Y	<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 • Telephone 	Our website's complaints section offers a convenient web form and information on alternative complaint channels. Additionally, an Equality Impact Assessment has been conducted on our complaints policy and procedure to ensure our ability to respond effectively by accommodating

			<ul style="list-style-type: none"> • WhatsApp • SMS • Online Chat • Social media • Directly or indirectly at meetings or other discussions. • Directly or indirectly from customer advocates or other representatives. 	<p>adaptations and reasonable adjustments. This encompasses alternative formats like large print, audio, Braille, multilingual options, sign languages, and live interpretation services. We take our duties under the Equality Act 2010 very seriously, and work to ensure colleagues are mindful of these. 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 complaint to the appropriate person within the landlord.	Y	This is clear in our complaints training and our 'raising and managing a complaint' system guide.	<p>Complaints training is incorporated into every induction, ensuring new colleagues are equipped with the necessary skills. Additionally, refresher sessions are offered bi-weekly to provide opportunities for colleagues to reinforce their knowledge and skills.</p>
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	Curo welcomes complaints from customers and values the opportunity they give us to put things right. As above, we take seriously our responsibility to record every expression of dissatisfaction as a complaint. We encourage customers to notify us of their complaints using the approach they	<p>Complaints also provide us with an opportunity to learn. To learn why things went wrong, and change things so that we don't repeat our failings. Also, where we have followed our procedures correctly, to learn where they might still be</p>

			feel most suitable. We recognise that this approach may mean that we experience higher volumes of complaints than some of our peers.	improved to deliver a better customer experience.
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	Please see 3.1 above for policy availability. Curo have a two-stage process which is clear in section 3 of the complaint procedures and section 6 of the complaints policy.	https://www.curo-group.co.uk/contact-us/feedback/complaints/
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	This is clear in section 1.6 and 1.7 of the policy.	
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	This is clear in section 1.3 of the policy and 1.7 of the procedure.	We would always accommodate this upon request of a resident and will ensure we have Third Party Permission for this to take place. We will also suggest this as an option if we feel it would be appropriate based on the communication we have with the resident.

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	This is clear in section 1.7 of the policy.	This information is included in every complaint letter and is pre-set for colleagues to use to ensure the correct information is provided consistently.
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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.	Y	We have a dedicated Customer Resolution team who oversee all complaints activity across the business and provide reporting to our governing body.	Our Customer Resolution Manager leads the Customer Resolution Team by providing support and guidance as well as by monitoring the standards of the service we provide.
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	At every stage of the process, a case manager oversees each complaint, ensuring accountability for its management. All colleagues undergo training and are empowered with the authority to negotiate and implement suitable resolutions.	Our complaints process within our system is structured to assign complaint-related tasks to any Curo colleague efficiently.

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	All customer-facing teams include complaints in their team plans	<p>Complaints training is incorporated into every induction, ensuring new colleagues are equipped with the necessary skills. Additionally, refresher sessions are offered bi-weekly to provide opportunities for colleagues to reinforce their knowledge and skills.</p> <p>During 2023/24 we refreshed our corporate Strategy which includes a Strategic Objective of 'Trusted Customer Service'. A complaints learning culture is very much aligned to this.</p>
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Y	This is clear in section 1 of our procedures and section 1.2 of our policy.	At Curo, we welcome complaints as valuable opportunities for improvement. We actively encourage customers to provide feedback, assuring them that we will listen, endeavour to resolve issues promptly, and

				transparently communicate reasons if resolution proves challenging.
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	Our policy sets out the two stages in our process.	As above, any expression of dissatisfaction is counted as a complaint so that we have assurance customers are not inadvertently having to go through extra complaints 'stages'.
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	As above.	
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	Complaints are always managed by Curo colleagues.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	As above.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint	Y	In order to ensure consistency in colleagues' complaints handling,	These letters are automatically generated within our system to

	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.		and to ensure that responses appropriately address the requirements of the Complaints Handling Code, we have standard (template) letters for all stages in our complaints process. The acknowledgment letter elaborates on the reasons for the complaint through bullet points, enabling the customer to confirm or clarify their concerns. Similarly, the resolution letters provided at both stages reiterate the full reasons for the complaint, ensuring clarity and transparency throughout the process.	make sure they are used by colleagues.
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 above.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind;	Y	This is clear in section 6.5 of the complaints policy and section 1.4 of the complaints procedure.	Our goal is to carefully consider extenuating circumstances and the unique situation of each resident, ensuring that we only exclude a case when it's truly appropriate to do so. This approach allows us to tailor

	<ul style="list-style-type: none"> 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. 			our response to the specific needs and circumstances of the individual, promoting fairness and thoroughness in our complaints handling process.
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	This is clear in section 6.1 of the policy and 4.2.1 and section 5.2.1 of the procedure.	If at stage 1 we cannot agree on a resolution within 10 days, or at stage 2 within 20 days we will contact the customer and try to agree an extension. If an agreement cannot be made, we will offer a resolution with the information we have available.
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.	Y	<p>This is clear in section 5.2 of the complaints policy and section 4.2.1 in the complaints procedure.</p> <p>Our housing management system, QL, facilitates recording of disclosed customer disabilities (and, just as importantly, the adjustments that colleagues should make to better support that customer).</p>	<p>As above, all Curo colleagues received training on the Equality Act (including reasonable adjustments) during 2023/24.</p> <p>We currently complete a triage exercise at the beginning of the complaints process when logging the complaint to confirm what information we already have or any change in circumstances for the resident</p>

				<p>to ensure we act appropriately for their needs.</p> <p>We have also completed an Equality Impact Assessment against our complaints policy and procedure to ensure we are equipped to respond suitably and that our policies do accommodate adaptations and reasonable adjustments.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Y	Section 6 of the complaints policy stipulates two stages.	<p>We have a two-stage complaint process unless the complaint is about a policy or the behaviour of an individual colleague when the process is one stage. Where the one-stage process applies, this is clearly explained to the customer.</p> <p>Please see above re refusals of complaints.</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.	Y	Our guide to managing complaints emphasises a centralised location in our system for all notes related to complaints.	The documents, including surveys, third-party permission forms, and customer evidence, are securely stored in our Mfiles system under the respective customer's account.

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	This is clear in section 6 of the complaints policy.	We know that for most complainants having their problem heard and acted on as quickly as possible is important. This is why we use a two-stage process so that the majority of cases can be resolved at Stage 1, and Stage 2 provides a more formal process for complaints that are more complex or likely to take longer to resolve.
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	We have an 'acceptable behaviours' policy. Section 5 highlights how we respond and communicate our evidence and reasons for any restriction.	Our policy and procedures take into account guidance published by the Ombudsman, and also the Ombudsman's own policy on managing unreasonable behaviour. We will only impose restrictions for an appropriate period. In most cases restrictions will apply for between six and 12 months but in exceptional cases they may be imposed for longer. In such cases the restrictions would be reviewed every six months. We will write to the customer after each review to explain the outcome. If the restriction 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.		This is clear in section 5.1.2.6 in the 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.
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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.	Y	This is clear in section 3.2 of the complaint procedures.	Complaint-related repairs are given a higher priority when scheduling the diaries of our trade colleagues.

	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.			When a complaint appears to be complex or accommodating adjustments for the complainant might prolong the resolution process, we will proactively reach out to the customer to discuss and potentially agree upon an extension.
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	This is clear in section 4.2.1 of the complaint procedure.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Y	This is clear in section 6.1 of the complaints policy and section 4.2.1 in the complaints procedure.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Y	This is clear in section 6.1 of the policy and 4.2.1 and section 5.2.1 of the procedure.	If at stage 1 we cannot agree on a resolution within 10 days, or at stage 2 within 20 days we will contact the customer and try to agree an extension. If an agreement cannot be made, we will offer a resolution with the information we have available.

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	This is clear in section 6.1 of the policy and 4.2.1 and section 5.2.1 of the procedure.	
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	This is clear in section 6.1 of the policy and 4.2.1 and section 5.2.1 of the procedure.	<p>After agreeing a resolution a letter is sent (unless the resident has specified an alternative contact preference), including:</p> <ul style="list-style-type: none"> • Complaint reference number. • Explanation of the customer's complaint. • Detailed plan of action to address each concern. • Opportunity to escalate to Stage 2 if dissatisfied with the proposed resolution. • Link to the complaints policy. • Guidance on contacting 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	The template acknowledgment letter elaborates on the reasons for the complaint through bullet points, enabling the customer to confirm or clarify their concerns. Similarly, the resolution letters provided at both	Comprehensive training is conducted throughout the organisation to ensure all complaint reasons are addressed. The second stage serves as a valuable opportunity to capture any

			stages reiterate the full reasons for the complaint, ensuring clarity and transparency throughout the process.	concerns that may have been overlooked during the initial stage.
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	This is clear in section 6.1 of the complaints policy and section 4.2.1 in the complaints procedure.	When a complaint is lodged, we review the account for any existing complaints, and if applicable, integrate the new complaint into the existing records.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; 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 	Y	This is clear in section 6.1 of the complaints policy and section 4.2.1 in the complaints procedure. As above, our use of template letters promote consistency and quality of responses to customers.	See 6.6 above.

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Y	This is clear in section 6.1 of the complaints policy and section 5.1 in the complaints procedure.	
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	This is clear in section 6.1 of the complaints policy and section 4.2.4 and 5.2.1 of the complaints procedure.	
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	This is clear in section 6.1 of the complaints policy and section 4.2.4 of the complaints procedure.	While residents do not need to provide a reason for escalating their complaint to stage 2, if they choose to provide reasons, these should be documented in the notes. These reasons should be discussed with the stage 2 complaint manager, once assigned

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	This is clear in section 6.1 of the complaints policy and section 3.2 of the complaints procedure	We manage stage 1 complaints through our customer database as a 'case'. Case notes from stage 1 complaints clearly outline which colleagues has been involved with the investigation and resolution already offered. This allows us to allocate stage 2 escalations to a colleague who has not already been involved
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Y	This is clear in section 6.1 of the complaints policy and section 5.2.1 of the complaints procedure	
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	This is clear in section 6.1 of the complaints policy and section 5.2.1 of the complaints procedure.	
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	This is clear in section 6.1 of the complaints policy and section 5.2.1 of the complaints procedure.	
6.17		Y	This is clear in section 6.1 of the policy and 4.2.1 of the procedure.	

	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.			
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	The acknowledgment letter elaborates on the reasons for the complaint through bullet points, enabling the customer to confirm or clarify their concerns. Similarly, the resolution letters provided at both stages reiterate the full reasons for the complaint, ensuring clarity and transparency throughout the process.	Comprehensive training is conducted throughout the organisation to ensure all complaint reasons are addressed. The second stage serves as a valuable opportunity to capture any concerns that may have been overlooked during the initial stage.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; 	Y	This is clear in section 6.1 of the complaints policy and section 4.2.1 in the complaints procedure.	See 6.18 above.

	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	Our Stage 2 response should include input from all relevant staff members necessary to formulate and issue a comprehensive and final response.	Suitable staff members may include technical experts, ASB specialists or department leads

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; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; 	Y	This is clear in section 1, 4.7, 5.8, 6.2, of the complaints policy and 1.3 and 3.2 in the complaints procedure.	Our team members are equipped with the skills to thoroughly investigate the circumstances preceding a complaint and understand the customer's experience. We are committed to expressing sincere apologies for any inconvenience or frustration we may have caused. Additionally, we promptly implement measures to address the situation and provide suitable compensation or resolution.

	<ul style="list-style-type: none"> • Providing a financial remedy; • Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	This is clear in 5.8 of the complaints policy. Our compensation matrix is used consistently to inform offers of compensation where relevant.	Any resolution offered to a customer will be reflective of the extent of the service failings and the impact on the customer. Factors taken into consideration (length and frequency of situation; severity; impact on the customer; customer circumstances etc.) will apply to all cases.
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	This is clear in 3.2 of the complaint procedure.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	This is clear in section 6.2 of the complaints policy.	We maintain regular communication with the housing ombudsman to seek guidance when determining appropriate compensation and resolutions. To ensure consistency throughout both stages of the complaint process, we conduct ongoing training, monitor procedures, and disseminate best practices recommended by the Housing Ombudsman.

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"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; any findings of non-compliance with this Code by the Ombudsman; the service improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Y	This is clear in 6.10 of the complaints policy.	<p>We publish information about complaints annually and this is available online and in a printable leaflet on request. This includes:</p> <ul style="list-style-type: none"> The number, type and outcome of complaints. 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	Our annual report is presented to our Board and is then made available on our webpage, together with the Board's response.	https://www.curo-group.co.uk/contact-us/feedback/complaints/
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y		We are committed to compliance in the event of significant restructuring, merger, or procedural changes but none of these events have taken place in the last year.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	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	This is clear in 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 as a result of any learning from the complaint.	Y	This is clear in our new Strategic Objective Trusted Customer Service (specifically the key goal 'Listen to customers, value their feedback and support, and act on what we hear'), and 1.2 and 1.3 of the complaint's procedure.	Complaints provide us with an opportunity to learn. To learn why things went wrong, and change things so that we don't repeat our failings. Also, where we have followed our procedures correctly, to learn where they might be improved to deliver a better customer experience.
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.	Y	This is clear in 1.4 of the complaints policy and 1.2 - 1.3 of the complaint procedures. As well as our 'Trusted Customer Service' Strategic Objective, the importance of a learning culture is also recognised in our new 'Purposeful Culture' Strategic Objective.	All customer-facing colleagues have complaints as a personal objective. We will celebrate our culture, where high performance delivers exceptional outcomes for customers. We have recruited a Complaints Data Analyst to focus exclusively on root cause analysis and patterns in our data, to be then shared with relevant service teams.
9.3		Y	This is clear in section 6.2 of the complaints policy.	Our complaints review forum (made up of customers)

	<p>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.</p>			<p>advises on our compliance with this policy and review anonymised complaints. They also advise if we are making fair and right decisions when it comes to resolution, including compensation.</p> <p>Complaints performance is discussed with our customer oversight group, bi-monthly, and learnings and service improvements discussed and monitored. Actions agreed by that group are monitored by the Audit and Assurance Committee (a committee of our governing body).</p> <p>Complaint resolution is a responsibility shared across our entire organisation, intricately tied to our strategic goals. Learning and performance discussions occur within teams on a daily, weekly, and monthly basis. Key insights are deliberated at all levels and disseminated monthly through our business cascade reports, ensuring alignment and continuous improvement throughout the organisation.</p>
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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.	Y	Our Chief Customer Officer is accountable for complaints. The Director of Customer Contact has weekly meetings with Chief Customer Officer	At these meetings, risks and necessary revisions with our Chief Customer Officer
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	Our CEO, who is a full member of our governing body, is our MRC.	Our CEO champions complaints and leads on this activity when linking to our governing body. This ensures complaints remains a high-profile topic at all levels of the business and the significance of learning and improvement is filtered throughout the organisation.
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	CEO presents complaints performance information to our governing body through regular and ad hoc reports.	Complaints performance and learning is reported regularly to our governing body, through quarterly performance updates, annually through our end of year report, or on an ad-hoc basis, where we have information to share about a particularly significant complaint case or a Housing Ombudsman determination.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Y		As above.

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
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>All customer-facing colleagues have complaints as a personal objective.</p> <p>Our system-driven complaints process empowers a broader spectrum of colleagues to take accountability for agreeing on remedies and facilitates closer involvement in ensuring their successful delivery through to completion.</p> <p>Complaints and complaint handling are always discussed at key colleague communication channels, such as monthly Cascade meetings, and quarterly Exec Briefings.</p>

