Housing Ombudsman Self-Assessment – **Curo June 2026**

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Considered documents: Curo Complaints Policy V9 April 2025

Foreword: The following self-assessment has been completed following implementation of Curo's new complaints model and consequent changes to our complaints policy. In the new model, complaints are directly managed by managers within the relevant service team, rather than by a centralised complaints team which now exists as a governance function, rather than a customer service one, to ensure compliance with the provisions of the Complaints Handling Code and promote robust data-driven learning and a positive complaints culture.

This document applies to Curo Group Limited and Curo Places Limited, which operate under a shared complaints policy and complaints handling framework.

The new complaints team is called the Complaints and Improvement Team and consists of:

- The Head of Complaints & Improvement, who is the Accountable Lead for the Complaints Policy, manages the Complaints and Improvement Team and reports to the Chief Governance Officer.
- The Complaints and Improvement Specialist, who is responsible for triaging new complaint submissions, completing quality assurance of open and closed complaints, and engaging with the Housing Ombudsman.
- The Complaints Support Advisor, who provides administrative support to the service teams.
- The Complaints Data Analyst, who facilitates learning through the analysis of complaints data.

Further information regarding these changes is available on our website.

Link: Complaints

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'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.'*	Y	Point 2.3 of Complaints Policy	We use the Housing Ombudsman's definition in both our published policy and internal 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	Points 2.3, 5.7 and 5.8 of Complaints Policy	We are hyper-vigilant in capturing expressions of dissatisfaction as complaints. Our Customer Contact Team, who monitor the majority of our main communication channels, were briefed that we must offer a complaint when a resident expresses dissatisfaction, following issue of the Complaint Handling Code. This vigilance is reflected in our high volume of complaints.

				We accept complaints logged by third parties. Resident can grant a representative tiered levels of access and permission 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 of Complaints Policy	This provision is explicit in our policy and delivered in our internal training.
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	Point 2.2 of Complaints Policy	Complaints are raised as their own workflow contacts on our CRM system. Any workflows or relevant orders which may have given rise to the complaint will continue to be progressed as per our standard processes.

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	Website link: Feedback: compliments, suggestions & complaints	Our website features a feedback page, where residents can make compliments, suggestions or complaints. All survey responses sent through our main contact channels are sent to the relevant business area for review. 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 the resident remains dissatisfied, this will be progressed 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	Point 2.1, 5.4, 6.5, 6.6, 6.7 and 6.9 of Complaints Policy	The necessity of considering individual merit is explicit in our policy, internal guidance and training as a foundational principle of how we manage complaints. Our policy explicitly outlines who it applies to as well as instances in which we will not progress a complaint. It also states that, when we are not accepting a complaint, we will provide the resident with our reasoning and signpost them to the Housing Ombudsman.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Y	Points 6.5, 6.6, 6.7 and 6.9. of Complaints Policy	Our policy outlines the circumstances in which we will not accept a complaint based on the Housing Ombudsman's guidance.

	• The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • 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	Point 6.5 of Complaints Policy	This is explicit in our Complaints Policy.
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	Point 6.9 of Complaints Policy	If we do not accept a complaint, we will provide the resident with our reasoning for doing so and signpost them to the Housing Ombudsman, so they can progress the matter if they disagree with our reasoning.

				This provision is strengthened by the new complaints workflow which includes an outcome to refuse a complaint at triage, which will generate a template letter to be drafted and sent to the resident.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Points 5.1, 5.2, 5.3 and 5.4 of Complaints Policy	Our policy, internal guidance and training all stress the importance of considering each complaint on its own merit, with respect to the individual circumstances of the resident and the severity of any service failure. This focus on fairness is outlined in our complaint principles and aligns with our core values (CROFT).

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	Point 5.7 of Complaints Policy Complaints can be made to Curo through any of our main communication channels, including: • 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 Website link: https://www.curo-group.co.uk/contact-us/feedback/complaints/	We have numerous channels of communication by which residents can raise complaints. 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.

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	Point 4.12 of Complaints Policy	Further to provision 3.1, this point of the policy states that all colleagues are responsible for recording complaints in a timely fashion.
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 1.3 and 1.4 of Complaints Policy	We are hyper-vigilant in capturing expressions of dissatisfaction as complaints. These points of the policy outline our commitment to valuing the experience of our residents and using complaint data to drive learning and service improvement.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Y	Point 1.6 of Complaints Policy. Website link: https://www.curo-group.co.uk/contact-us/feedback/complaints/	Our Complaints Policy is available on our website and can be requested in alternative formats.
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	Points 1.6 and 1.7 of Complaints Policy	These points outline the information we publish and provide a link to access the complaints page of our website.

				This page includes our policy, annual self-assessment against the Code and annual service improvement report with the Board's response. It also provides the contact information for the Housing Ombudsman.
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	Point 5.8 of Complaints Policy.	We accept complaints made by residents on behalf of third-party representatives who have a signed copy of consent.
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	Mail-merge letter templates	We process complaints via a CRM system workflow. The new workflow includes actions that generate letter templates for all 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 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	Points 4.1, 4.2, 4.3 and 4.4.	The role of 'complaints officer' is fulfilled by the Complaints and Improvement team within our Governance department, the duties of which are outlined in these points.
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	Complaints and Improvement Team (CIT)	In our new process, complaints will be managed by managers, dependent on the cause of the complaint and what the complainant is seeking as a resolution. These managers have received training and are encouraged to use their discretion to resolve complaints based on their individual merit. Our internal guidance serves to support their decision-making and promote consistency, while the CIT conducts quality assurance to ensure we remain compliant with the

				provisions of the Code and promotes best practice as per the Housing Ombudsman's guidance. The CIT will have access to colleagues across the company's management structure to deliver these objectives and is managed by a head of service that reports to an executive.
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	Points 1.1, 1.2, 1.3, 1.4, 4.3, 4.4, 4.11 and 4.12 of Complaints Policy	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. To deliver this vision, we have implemented five strategic objectives, two of which are relevant to this provision: Trusted Customer Services and Solid Foundations. By having colleagues throughout the business manage complaints, we intend to embed a positive

				complaints culture and equip all customer-facing colleagues with the necessary training to feel confident in managing complaints. The CIT is responsible for supporting these objectives by providing data-driven learning (Complaints Data Analyst), guidance on best practice as per the Housing Ombudsman's guidance (Complaints and Improvement Specialist) and administrative support (Complaints Support Advisor).

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	Points 3.1, 3.2, 3.3 and 9 of Complaints Policy	These points outline the scope of our policy and Curo's commitment to equality in the service our residents receive in the complaints process.

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	Point 6.1 of Complaints Policy	Our policy outlines that we use a formal, two-stage complaints process.
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 6.7 and 6.10 of Complaints Policy	These points are explicit in the responsibilities of 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	Point 4.8 of Complaints Policy	This point is clear that we will address complaints against contractors acting on our behalf.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	Point 4.8 of Complaints Policy	We manage complaints made about third-parties on our behalf internally.
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	Y	Mail-merge letter templates	As per provision 3.7, our complaints workflow automatically generates letter templates for formal correspondence. All these letters include a section to

	definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.			confirm our understanding of the complaint definition, with the formal acknowledgements encouraging residents to contact us if our understanding is incorrect.
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. Point 4.3. of Complaints Policy	As per provision 5.6. Further, the Complaints and Improvement Specialist will advise residents once a complaint submission has been triaged if any element of their complaint does not fall within the scope of our complaints process to be clear what will and will not be addressed.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Y	Points 5.1, 5.2, 5.3, 5.4, 5.5. 5.6 of Complaints Policy	These principles are outlined in our policy and embedded through internal guidance and training.

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.		Point 6.1 of Complaints Policy	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 that we require an extension. In doing so, we will provide our reasoning and the contact information for the Housing Ombudsman. This practice is standardised by our complaints workflow, which can generate a letter template to notify the resident of an extension.
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	Point 4.3 of Complaints Policy	As per provisions 2.1, 2.5 and 5.8, our policy and internal guidance is clear that we will consider each complaint on its own merit. Our CRM system allows us to record residents' disabilities, vulnerabilities and reasonable adjustments. Collection of this data is part of our

				Customer Contact Team's standard scripts. The Complaints and Improvement Specialist is responsible for conducting a comprehensive triage of any new complaints submissions, which will clearly record any disabilities, vulnerabilities, communications requirements or reasonable adjustments.
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	Point 6.1 and 6.2 of Complaints Policy	All complaints are processed in a two-stage process, excluding those which concern our use of a resident's personal data. These are addressed by the Data Protection Manager, who is Curo's designated Data Protection Officer.
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	Y	QL and M-Files	Complaints are logged as contact workflows on our CRM system. These contacts include a section for complaint handlers to leave notes.

	documentation such as reports or surveys.			All our documents are saved to M-Files, a centralised document management system against the resident's tenancy or property. It is possible to save documents against the complaint contact reference, providing a centralised repository for relevant correspondence and evidence which can be quickly located by searching for the complaint reference. The importance of good record-keeping is stressed to complaint handling colleagues in training, as it provides a better service to residents, supports internal communication and allows us to evidence our efforts to the Housing Ombudsman.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must	Y	Points 4.5 and 5.2 of Complaints Policy	We recognise that for most complainants having their problem heard and acted on as quickly as possible is

	ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			important, and this is reflected in our complaints principles. A majority of our complaints are resolved at Stage 1, with Stage 2 providing an opportunity for any reasoning to be reconsidered and a more detailed review of longstanding or complicated complaints. All operational team leaders and managers are responsible for addressing complaints at Stage 1 and they have remit to offer remedies within their delegated authority.
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	Acceptable Behaviour Policy Points 5.11 and 6.8 of Complaints Policy	We have an Acceptable Behaviour Policy. The referenced points outline qualifying circumstances for the application of this policy with respect to complaints. Our policy and procedure has considered guidance published by the Housing

				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 twelve 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.	Y	Acceptable Behaviour Policy Point 6.8 of Complaints 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	Point 4.5 of Complaints Policy Triage & Allocation Form	This point acknowledges that a majority of complaints can be resolved at Stage 1 through timely resolutions. The Complaints and Improvement Specialist completes a detailed triage of any new complaint submissions. This includes a section for recording EDI data and determining if the case is high risk - the framework for determining the risk of complaints has been informed by the risk framework used by our Assurance team, to ensure internal consistency.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Y	Section 6.1 of Complaints Policy	No commentary - explicit

6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Y	As per provision 6.2.	As per provision 6.2.
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	As per provision 6.2.	As per provision 6.2.
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	As per provision 6.2.	As per provision 6.2.
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	Complaint workflow	The complaint contact workflow allows colleagues to continue monitoring a complaint once a response has been issued. Agreed actions such as works can be raised within the contact, linking any completion reports, and our training encourages colleagues to keep the contact open until all agreed actions have been

				completed and the resident is satisfied. In instances where the complaint contact is closed (e.g. on the resident's request), a new contact can be raised and linked to the complaint contact, allowing us to monitor the completion of any outstanding actions.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Y	Section 6.1 of Complaints Policy Mail-merge letter templates	Our letter templates include guidance for colleagues with prompts to detail the reasoning for any decisions with reference to relevant policies.
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	As per provision 6.2.	As per provision 6.2.
6.9	Landlords must confirm the following in writing to the resident at the	Y	Mail-merge letter templates	These details are all included in our letter

	completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			templates, which have been drafted in line with the provisions of the Code and reviewed by our Communications team to ensure they use accessible language.

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	As per provision 6.2.	As per provision 6.2.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Y	As per provision 6.2.	As per provision 6.2.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Y	As per provision 6.2.	As per provision 6.2.

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	As per provision 6.2.	As per provision 6.2.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Y	As per provision 6.2.	As per provision 6.2.
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	As per provision 6.2.	As per provision 6.2.
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 6.2.	As per provision 6.2.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly	Y	As per provision 6.6.	As per provision 6.6.

	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 6.9.	As per provision 6.9.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	As per provision 6.2.	As per provision 6.2.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Y	Points 5.3, 5.4 and 5.5 of Complaints Policy	We deliver training to complaint handling colleagues on remedies in line with our compensation procedure and the Housing Ombudsman's published remedy guidance.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Points 5.3, 5.4 and 5.5 of Complaints Policy	This is a foundational principle of our complaints process, embedded through training and the referenced internal guidance – where we have failed, the fundamental goal is to return the resident to the position

				they were in before the issue arose.
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	As per provision 6.9.	Any remedy offer to a complaint will be outlined in our formal response. Colleagues are encouraged in internal training to use the SMART framework when confirming remedies.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y		Our remedy guidance is based on the Housing Ombudsman's published remedy guidance, as well as additional learning on dispute resolution principles available on the Centre for Learning. The Complaints and Improvement Specialist completes quality assurance of closed complaints to ensure that remedies offered are in line with our policies and the Housing Ombudsman's guidance for best practice. We are in the process of reviewing our compensation policy and procedure following

				publication of the Housing Ombudsman's February 2026 remedy guidance.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Y	Points 1.6 and 6.12 of Complaints Policy Complaints	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: • 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	Y	Complaints	The annual report is presented to our Board

	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.			whose response is also published on our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	Please refer to foreword	Please refer to foreword
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	Y	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	Action 14 in Section 4.3 of the Customer Contact Team Business Continuity Plan V2.2	'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	New 'ten-year' vision and company strategic plan Point 4.2 and 4.11 of Complaints Policy	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'. The CIT includes a dedicated Complaints Data Analyst, whose focus is root cause analysis and patterns in our complaint data. The Head of Complaints & Improvement is responsible for using this data to drive continuous service improvement among the service teams.
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	As per provisions 4.3 and 9.1.	As per provisions 4.3 and 9.1.

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 6.11 of Complaints Policy	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. 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. The Audit and Assurance Committee will also review any complaint outcomes which may constitute a strategic business risk, such as adverse determinations from the Housing Ombudsman or potential compliance regulatory

				issues arising from the complaint, granting an additional layer of oversight and assurance.
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	Complaints Policy (page 1)	Our Chief Governance Officer is the policy owner for complaints. The Head of Complaints & Improvement is 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	The chair of our Customer Experience Committee is the designated MRC.	The chair of our Customer Experience Committee 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	As per provision 9.3.	As per provision 9.3.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Y	As per provision 9.3.	As per provision 9.3.

	a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Y	As per provisions 4.3 and 9.1.	As per provisions 4.3 and 9.1, we recognise that complaints is a vital part of our new corporate strategy. All colleagues are expected to set personal development objectives in line with this strategy.