

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	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	<p>Lumen Complaint Policy & Procedure</p> <p>Lumen Customer Complaints Guide</p> <p>Lumen Website</p>	<p>Exact definition included in current Lumen Complaint Policy and Procedure (Page 6), Lumen customer complaints guide and definition is stipulated on the website: Complaints - Lumen Housing</p>
1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>Lumen Customer Complaints Guide</p> <p>Staff Complaints Guide</p>	<p>This is stipulated in the Lumen Complaint Policy and Procedure (Pages 6 and 7), and the Customer Complaints Guide</p> <p>Staff Complaints Guide are also available and cascaded to ensure staff understand the complaints process and that dissatisfaction should be addressed by all staff at the point of contact and the choice given to make a complaint. The guidance also stipulates that a complaint from a third party or representative is handled using the same policy and procedure. Ongoing internal communications are produced to staff regarding complaint processes and mandatory customer care training provided with a focus of 'Right First Time'</p>

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.	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide Staff Complaints Guide also outlines this.
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.	Yes	Customer Complaints Guide Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 6 & 7), and the Customer Complaints Guide Covered in the Staff Complaints Guide
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Customer Complaints Guide Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide Covered in the Staff Complaints Guide

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide
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 the Claim Form and Particulars of Claim, having been filed at court. 	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide

	<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.	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Page 7), and the Customer Complaints Guide

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Lumen Complaints Policy Website HUG Pack Reasonable Adjustments Policy	This is stipulated in the Lumen Complaint Policy and Procedure (Page 8) In writing By email Website By telephone By private message on Social Media In person 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.		Lumen Complaints Policy Customer Complaints Guide Staff Complaints Guide Staff Training Records Website	This is included in the Complaints Policy, Customer Complaints Guide and the Staff Complaints Guidance Discussed at team meetings Staff training via 'Right First Time' Internal communications

				Website, Complaints Policy
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Lumen Complaints Policy</p> <p>Monthly Performance Note book</p> <p>H & S Dashboard</p> <p>Shareholder Scorecard</p> <p>Acuity Benchmarking</p>	<p>This is covered in the reporting and assessment section of the Lumen Complaints Policy.</p> <p>Lumen Website: Complaints - Lumen Housing</p> <p>Complaints are logged and reported monthly to SMT and quarterly to the board and Shareholder.</p> <p>Complaints are benchmarked against other housing providers with less than 1000 units via the Acuity Benchmarking Group.</p> <p>The complaints process is publicised via the Lumen Website, Leaflets in reception, social media and communal areas.</p>
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	Yes	<p>Lumen Website</p> <p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p>	<p>Customer complaints policy is available on web as a PDF but also as a web page for web accessibility.</p> <p>Hard copies available upon request.</p>

	must also be published on the landlord's website.			Customer complaints Guide summarises complaint policy and process.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		Lumen Complaints Policy Lumen Website	Lumen Complaints Policy makes reference to the Housing Ombudsman code. The policy is published on the Lumen 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.	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy and Procedure (Pages 6, 8 and 12)
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Lumen Complaints Policy Lumen Website Customer Complaints Guide	Reference to the Housing Ombudsman and customers right to access is stipulated in the Complaint Policy and Procedure (Pages 9, 11 12,13,14,15 and 16) Page 18 specifically references the Complaint Handling Code and provides a link to the complaint handing code. The Housing Ombudsman website and complaint handling code are direct links on the LUMEN website under the complaint section

				Customer Complaints Guide has the Ombudsman contact details
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Lumen Complaints Policy Customer Complaints Guide Lumen Staff Complaints Guidance	Lumen Complaints Policy on page 10 makes reference to the 'Complaints Officer' Customer Complaints Guide pages 4 & 5 makes reference to the 'Complaints Officer' Lumen Staff Complaints Guidance makes reference to the role of the 'Complaints Officer'
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Lumen Complaints Policy	Lumen Complaints Policy Page 10 'Complaints Officer'
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	Yes	Lumen Complaints Policy	The Scrutiny and Learning Section of the Lumen Complaints Policy and Procedure (Page 15) documents Lumen's

	important that complaints are seen as a core service and must be resourced to handle complaints effectively			<p>approach a culture of learning from complaints.</p> <p>Staff have been trained on the new Policy and 'Right First Time' training has been provided to staff</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.	Yes	Lumen Complaints Policy	Lumen Complaints Policy & Procedure Page 5
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Lumen Complaints Policy	<p>Early & Local resolution Page 9/10</p> <p>First Point of Contact – Page 6</p>
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p> <p>Lumen website</p>	Lumen Complaints Policy Pages 10, 11, 12 & 13 refer to Lumen's 2 stage complaints process. This is also documented in the Customer Complaints Guide

				and displayed on the Lumen website.
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.		Lumen Complaints Policy Lumen Staff Complaints Guidance	This is covered within the Lumen Complaints Policy on page 6 'Types of Complaint' This is also covered within the Lumen Staff Complaints Guidance
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		Lumen Complaints Policy	This is covered within the Lumen Complaints Policy on page 5
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Lumen Complaints Policy	This is covered within the Lumen Complaints Policy Stage 1 – Page 10 – Acknowledgement Letter Stage 2 – Pg 12
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Lumen Complaints Policy	This is covered within the Lumen Complaints Policy Stage 1 – Page 10 – Acknowledgement Letter Stage 2 – Pg 12

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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. 	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Staff Complaints Guidance</p>	<p>This is covered within the Lumen Complaints Policy - Stage 1 - Page 10</p> <p>This is covered within the Lumen Staff Complaints Guidance Investigation – Page 3</p>
5.9	<p>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.</p>	Yes	Lumen Complaints Policy	<p>This is covered within the Lumen Complaints Policy – Pages 12/13</p>
5.10	<p>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.</p>	Yes	<p>Lumen Complaints Policy</p> <p>Reasonable Adjustments Policy</p> <p>Lumen Website</p> <p>Lumen Sign-Up, Property Inspection Process & Tenancy Sustainment Procedure</p>	<p>Accessibility section of the Lumen Complaints Policy – Pages 10/11</p> <p>Reasonable Adjustments Policy is published on the Lumen Website</p> <p>Disabilities are recorded on the tenants file and kept under review through sign</p>

				up, inspection and support processes.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Lumen Complaints Policy Lumen Staff Complaints Guidance	This is covered in the Lumen Complaints Policy on Pages 11 & 12 and the Lumen Staff Complaints Guidance document.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Lumen Complaints Policy Lumen Operational Complaints Procedure	Managed by the Complaints Officer and saved centrally on the internal drive. The Lumen Operational Complaints Procedure captures the process for capturing this information
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Lumen Complaints Policy Lumen Staff Complaints Guidance Right First Time Training	Stage 1 formal complaints are investigated by a Manager or Team Leader of the service (Policy Page 9) Stage 2 complaints are considered by the Director of the Service and Head of Service. Complaint Handlers have the authority and autonomy to act and make decisions and offer remedial action,

				<p>apologies, good will gestures and financial compensation to resolve the complaint at any stage. They all have access to the Lumen Compensation Policy and the Housing Ombudsman Guidance on Remedies.</p> <p>Early resolution of complaints is covered in the Lumen Complaints Policy on Pages 6, 9 & 10 and within the Lumen Staff Complaints Guidance. Staff have been trained to identify where things can be dealt with quickly as an early resolution through Right First Time Training</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Lumen Unacceptable Behaviour Policy	Lumen Housing has an Unacceptable Behaviour Policy which captures our approach to managing Unacceptable behaviour.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	Reasonable Adjustments Policy Unacceptable Behaviour Policy	The Lumen Customer Reasonable Adjustments Policy has been developed in line with the Equality Act

	for the provisions of the Equality Act 2010.			2020 and the Housing Ombudsman Reasonable adjustment and special considerations guidance. The Lumen Unacceptable Behaviour Policy has been developed in line with the Housing Ombudsman Unacceptable user action policy.
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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. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Lumen Complaint Policy</p> <p>Lumen Staff Complaints Guidance</p> <p>Complaint Handler Checklist</p> <p>Right First Time Training</p>	<p>Complaint Handlers have the authority and autonomy to act and make decisions and offer remedial action, apologies, good will gestures and financial compensation to resolve the complaint at any stage. They have access to the Lumen Compensation Policy and the Housing Ombudsman Guidance on Remedies.</p> <p>Early Resolution is referred to in the Policy (Page 6 & 10) and all staff have undergone Right First Time Training with a focus on resolving issues at the first opportunity.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u>	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Staff Complaints Guidance</p>	<p>This is covered within the Lumen Complaints Policy Page 10 and Lumen Operational Procedure</p>

	<u>working days of the complaint being received.</u>			
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Lumen Complaints Policy Lumen Website	This is covered in the Lumen Complaints Policy on Page 11 and it is published on the Lumen Website
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.	Yes	Lumen Complaints Policy Lumen Website Lumen Staff Complaints Guidance Lumen Customer Complaints Guide	This is covered in the Lumen Complaints Policy on Page 11 and it is published on the Lumen Website
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Lumen Complaints Policy Lumen Website Lumen Staff Complaints Guidance Lumen Customer Complaints Guide	This is covered in the Lumen Complaints Policy on Page 11
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	Yes	Lumen Complaints Policy Lumen Website Lumen Staff Complaints Guidance	This is stipulated in the Complaint Policy on Page 13

	actioned promptly with appropriate updates provided to the resident.			
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Lumen Complaints Policy Lumen Staff Complaints Guidance	This is stipulated in the Complaint Policy on Pages 10 and 13 and within the Lumen Staff Complaints Guidance
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.	Yes	Lumen Complaints Policy Lumen Staff Complaints Guidance Lumen Website	This is stipulated in the Complaint Policy on Pages 10 and 13 and within the Lumen Staff Complaints Guidance
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 	Yes	Lumen Complaints Policy Lumen Website Lumen Staff Complaints Guidance	This is stipulated in the Complaint Policy and Procedure Page 11 and the Lumen Staff Complaints Guidance

	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.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Website Lumen Staff Complaints Guidance	This is stipulated in the Lumen Complaints Policy on page 11 & 13 and the Operational Procedure Lumen Staff Complaints Guidance
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.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Website Lumen Customer Complaints Guide	This is stipulated in the Complaint Policy and Procedure on page 12 and within the Lumen Operational Procedure. It is also covered in the Lumen Customer Complaints Guide which is published on the Lumen website.

6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Lumen Complaints Policy Lumen Website	This is stipulated in the Complaint Policy on page 12 which is published on the Lumen Website
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 12 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 12 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 12 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide

6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 12 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
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;	Yes	Lumen Complaints Policy Lumen Operational Procedure Lumen Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Operational Procedure</p> <p>Lumen Staff Complaints Guide</p>	This is stipulated in the Lumen Complaint Policy on pages 12/13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; 	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Compensation Policy</p> <p>Lumen Staff Complaint Guidance</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Evaluation Forms</p>	This is stipulated in the Complaint Policy and Procedure on pages 13/14

	<ul style="list-style-type: none"> • 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. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaints Operational Procedure</p> <p>Lumen Staff Complaint Guidance</p>	This is stipulated in the Complaint Policy and Procedure on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p>Lumen Complaint Policy</p> <p>Lumen Complaints Operational Procedure</p> <p>Lumen Compensation Policy</p> <p>Lumen Staff Complaint Guidance</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Action Tracker</p>	<p>This is stipulated in the Complaint Policy and Procedure on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide</p> <p>All remedies offered are tracked on a complaint action tracker and monitored by the Service Manager</p>

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Lumen Complaint Policy Lumen Complaints Operational Procedure Lumen Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure on page 13 and within the Lumen Complaints Operational Procedure. This is also covered in the Lumen Staff Complaints Guide
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Section 8: Putting things right

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> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Annual Report</p>	<p>This is stipulated in the Complaint Policy on page 13, 14 and 15</p>

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.	Yes	Lumen Complaints Policy Lumen Annual Report Lumen Website	This is stipulated in the Complaint Policy on page 14
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Lumen Complaints Policy	This is stipulated in the Complaint Policy on page 15
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Lumen Complaints Policy	This is stipulated in the Complaint Policy on page 15
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Lumen Complaints Policy	This is stipulated in the Complaint Policy on page 15

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaint Evaluations</p> <p>H & S Dashboard</p> <p>Board Minutes</p> <p>OMT/SMT Monthly Performance Minutes</p>	<p>This is stipulated in the Complaint Policy on pages 14 and 15</p> <p>Following the closure of a complaint, Heads of Service (Stage 1) or Directors (Stage 2) complete a complaint evaluation which covers the root cause of the complaint, what was done to resolve it and wider actions needed to improve services or prevent re-occurrence.</p> <p>Complaint data is reported to the Board via the H & S Dashboard. The Management Team receive monthly updates on complaints along with identified trends and areas that may need reviewing</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaint Evaluations</p>	As above in 9.1

	must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		<p>H & S Dashboard</p> <p>Board Minutes</p> <p>OMT/SMT Monthly Performance Minutes</p> <p>Team Meetings</p> <p>Staff Training and Briefing Sessions</p>	We have open dialogue regarding complaints and as a consequence when things go wrong we ensure that processes are reviewed.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaint Evaluations</p> <p>H & S Dashboard</p> <p>Board Minutes</p> <p>OMT/SMT Monthly Performance Minutes</p> <p>Team Meetings</p> <p>Staff Training and Briefing Sessions</p>	<p>As above in 9.1</p> <p>We have open dialogue regarding complaints and as a consequence when things go wrong we ensure that processes are reviewed.</p> <p>Complaint information and lessons learnt will be shared with customers in the Annual Report</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,	Yes	<p>Lumen Complaints Policy</p> <p>OMT/SMT Monthly Performance Minutes</p>	This is stipulated in the Complaint Policy on Page 16.

	serious risks, or policies and procedures that require revision.			
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Lumen Complaints Policy H & S Dashboard Board Minutes	This is stipulated in the Complaint Policy on Page 16.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Lumen Complaints Policy H & S Dashboard Board Minutes	This is stipulated in the Complaint Policy on Page 16.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with		Lumen Complaints Policy H & S Dashboard Board Minutes	This is stipulated in the Complaint Policy on Page 16.

	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.	Yes	Lumen Complaints Policy Lumen Complaint Handling Staff Training Slides OMT/SMT Monthly Performance Minutes H & S Dashboard Board Minutes	This is stipulated in the Complaint Policy on Page 16. Lumen Complaint Handling Staff Training Sessions Right First Time Training