

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>	Yes	Lumen Complaint Policy Lumen Customer Complaints Guide Lumen Website	Exact definition included in current Lumen Complaint Policy (Page 6) Lumen customer complaints guide and definition is stipulated on the website: Complaints - Lumen Housing
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.	Yes	Lumen Customer Complaints Guide Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy (Pages 6 and 7), and the Customer Complaints Guide Staff Complaints Guide are 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. Ongoing internal communications are produced to staff regarding complaint processes and mandatory customer care training provided with a focus of 'Right First Time'

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 (Pages 6 & 7), and the Customer Complaints Guide Staff Complaints Guide also outlines this Service requests are recorded, monitored and reviewed by each service
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 (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	Lumen Complaints Policy Staff Complaints Guide	This is stipulated in the Lumen Complaint Policy (Page 7 & 8) 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 (Page 7) 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. • Matters that have previously been considered under the complaints policy. 	Yes	Lumen Complaints Policy Customer Complaints Guide	This is stipulated in the Lumen Complaint Policy (Page 7), Customer Complaints Guide

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 (Page 7) 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 (Page 7) Customer Complaints Guide Staff Training Sessions
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 (Page 7) 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	<p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p> <p>Website</p> <p>Sign Up Pack</p> <p>Reasonable Adjustments Policy</p> <p>Advocacy Policy</p>	<p>This is stipulated in the Lumen Complaint Policy (Page 8 & 9)</p> <p>In writing</p> <p>By email</p> <p>Website</p> <p>By telephone</p> <p>In person</p> <p>A copy of the customer complaints guide is provided to tenants with their sign up pack.</p> <p>Interpretation Services</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.		<p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p> <p>Staff Complaints Guide</p> <p>Staff Training Records</p> <p>Website</p>	<p>This is included in the Complaints Policy, Customer Complaints Guide and the Staff Complaints Guidance</p> <p>Discussed at team meetings</p>

				<p>Staff training via 'Right First Time'</p> <p>Internal communications</p> <p>Website, Complaints Policy</p> <p>Staff Training Sessions on the Complaints Handling Procedure</p>
3.3	<p>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.</p>	Yes	<p>Lumen Complaints Policy</p> <p>Monthly Performance Note book</p> <p>H & S Dashboard</p> <p>Shareholder Scorecard</p> <p>Acuity Benchmarking Report</p>	<p>This is covered in the reporting and assessment section of the Lumen Complaints Policy on page 15.</p> <p>Complaints are logged and reported to SMT, 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, office reception, sign up pack (HOME USER</p>

				GUIDE) and communal areas.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<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> <p>Customer complaints Guide summarises complaint policy and process.</p> <p>Access to Interpretation Services</p>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Website</p>	<p>Lumen Complaints Policy makes reference to how Lumen will publicise details of the policy on page 17.</p> <p>The Housing Ombudsman code is covered within the Lumen complaints policy on page 18.</p> <p>The policy is published on the Lumen website and issued to all tenants on sign up of their tenancy</p>

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	<p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p> <p>Reasonable Adjustments Policy</p> <p>Advocacy Policy</p> <p>Staff Complaints Guide</p>	This is stipulated in the Lumen Complaint Policy (Pages 8 and 9)
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	<p>Lumen Complaints Policy</p> <p>Lumen Website</p> <p>Customer Complaints Guide</p> <p>Stage 1 and stage 2 template letters</p>	<p>Reference to the Housing Ombudsman and customers right to access is stipulated in the Complaint Policy and (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.</p> <p>The Housing Ombudsman website and complaint handling code are direct links on the LUMEN website under the complaints section</p>

				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	<p>Lumen Complaints Policy</p> <p>Customer Complaints Guide</p> <p>Lumen Staff Complaints Guidance</p>	<p>Lumen Complaints Policy on page 10 makes reference to the 'Complaints Officer'</p> <p>Customer Complaints Guide pages 4 & 5 makes reference to the 'Complaints Officer'</p> <p>Lumen Staff Complaints Guidance makes reference to the role of the 'Complaints Officer'</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	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 important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p>Lumen Complaints Policy</p> <p>Complaints satisfaction survey and evaluation process</p> <p>Right first time training</p> <p>Team meetings</p> <p>Housing Ombudsman Micro Learning Portal</p> <p>Published Information in the public domain</p>	<p>The Scrutiny and Oversight Section of the Lumen Complaints Policy (Page 15) documents Lumen's approach a culture of learning from complaints.</p> <p>Staff receive an annual refresher on the Policy after the self-assessment is completed</p> <p>'Right First Time' training has been provided to staff</p> <p>Housing Ombudsman Micro Learning Portal has been rolled out to the team and</p> <p>Complaints Performance is published on the Lumen website with the TSM data on the performance page, in the Lumen Housing Complaints and Service Improvement Report on the Complaints and Performance pages of the website and in the annual report which is also published on the website</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 Page 5 which states that Residents will not be treated differently by Lumen Housing should they raise a complaint and all complaints will be actioned fairly and consistently in line with this policy
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Lumen Complaints Policy Customer Complaints Guide	Lumen complaints policy references the 'Early & Local Resolution' within section 13 Page 10 First Point of Contact – Page 6 Stages 1 & 2 is referred to within the Complaints Policy and the Customer Complaints Guide
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	Lumen Complaints Policy Customer Complaints Guide	Lumen Complaints Policy Pages 10, 11, 12 & 13 refer to Lumen's 2 stage complaints process. This is

	complaint process unduly long and delay access to the Ombudsman.		Lumen website	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.	Yes	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.	Yes	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 Lumen Staff Complaints Guidance	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 Acknowledgement Letter

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	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Lumen Complaints Policy	This is covered within the Lumen Complaints Policy – Pages 13
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<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	This is covered in the Lumen Complaints Policy on Pages 12 & 13
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	<p>Lumen Complaints Policy</p> <p>Lumen Operational Complaints Procedure</p> <p>Complaints Log & Internal Network</p>	<p>Lumen complaints policy page 10 makes reference to records being maintained</p> <p>The Lumen Operational Complaints Procedure captures the process for capturing this information</p> <p>Complaints are logged and managed by the Complaints Officer, records are saved centrally on the internal drive.</p>
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	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Staff Complaints Guidance</p>	Stage 1 formal complaints are investigated by a Manager or Team Leader of the service (Complaints Policy Page 10)

	at any stage of the complaints process without the need for escalation.		<p>Right First Time Training</p> <p>Compensation Policy</p>	<p>Stage 2 complaints are considered by the Director and Head of Service (Complaints Policy Page 12)</p> <p>Complaint Handlers have the authority and autonomy to act and make decisions and offer remedies at any stage of the complaints process such as, 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	Yes	Lumen Unacceptable Behaviour Policy	Lumen Housing has an Unacceptable Behaviour

	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.			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 for the provisions of the Equality Act 2010.	Yes	Reasonable Adjustments Policy Unacceptable Behaviour Policy	The Lumen Customer Reasonable Adjustments Policy has been developed in line with the Equality Act 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.

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 Apologies and Remedies.</p> <p>Early Resolution is referred to in the Policy (Page 6, 9 & 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 Customer Complaints Guide</p>	Complaints are acknowledged, defined and logged within 5 working days of the complaint being

	<u>working days of the complaint being received.</u>		<p>Lumen Website</p> <p>Lumen Staff Complaints Guidance</p> <p>Lumen Complaints Operational Procedure</p>	received. This is covered within the Lumen Complaints Policy Page 10, the customer complaints guide and it is published on the Lumen Website. All documents are accessible via the Complaints Section of the Lumen website
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Customer Complaints Guide</p> <p>Lumen Website</p> <p>Lumen Staff Complaints Guidance</p> <p>Lumen Complaints Operational Procedure</p>	This is covered in the Lumen Complaints Policy on Page 11, within the Customer Complaints Guide 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,	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Website</p> <p>Lumen Staff Complaints Guidance</p>	This is covered in the Lumen Complaints Policy on Page 11 and it is published on the Lumen Website

	and the reason(s) must be clearly explained to the resident.		Lumen Customer Complaints Guide	
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 and is published on the Lumen website
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.	Yes	Lumen Complaints Policy Lumen Website Lumen Staff Complaints Guidance	This is covered in the Complaint Policy on Page 10 and is published on the Lumen Website
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 covered in the Complaint Policy on Page 10 and is published on the Lumen website It is also covered within the Lumen Staff Complaints Guidance
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the	Yes	Lumen Complaints Policy	This is covered in the Complaint Policy on Pages

	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.		<p>Lumen Staff Complaints Guidance</p> <p>Lumen Website</p>	<p>10 and 11 and is published on the Lumen website.</p> <p>It is also covered within the Lumen Staff Complaints Guidance</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Website</p> <p>Lumen Staff Complaints Guidance</p>	<p>This is covered in the Complaint Policy on page 11 which is also published on the Lumen website</p> <p>It is also covered within the Lumen Staff Complaints Guidance</p>

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 Website Lumen Operational Procedure	This is covered in the Lumen Complaints Policy on page 11 and it is published on the Lumen website It is covered within the Operational Procedure
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 covered 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	Yes	Lumen Complaints Policy Lumen Website	Complainants are not required to explain their reasoning for requesting escalation and Lumen Housing will make reasonable efforts to

	unhappy as part of its stage 2 response.			understand why the complainant remains unhappy. This is covered 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 Customer Complaints Guide Lumen Website Lumen Operational Procedure Lumen Staff Complaints Guide	This is covered in the Lumen Complaint Policy on page 12 and the Customer Complaints Guide which is published on the website. It is also covered within the Lumen Complaints Operational Procedure and 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 Customer Complaints Guide Lumen Website Lumen Operational Procedure Lumen Staff Complaints Guide	This is covered in the Lumen Complaint Policy on page 12 and the Customer Complaints Guide which is published on the website. It is also covered within the Lumen Complaints Operational Procedure and the Lumen Staff Complaints Guide
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Lumen Complaints Policy Website	This is covered in the Lumen Complaint Policy on

	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.		Lumen Operational Procedure Lumen Staff Complaints Guide (this needs updating)	page 12/13 and is published on the website. It is also covered within the Lumen Complaints Operational Procedure and 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 Website Lumen Operational Procedure Lumen Staff Complaints Guide (this needs updating)	This is covered in the Lumen Complaint Policy on page 13 which is published on the website Also covered within the Lumen Complaints Operational Procedure and within 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 Website Lumen Operational Procedure Lumen Staff Complaints Guide (this needs updating)	This is covered in the Lumen Complaint Policy on page 13 which is published on the website. It is also covered within the Lumen Complaints Operational Procedure and 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 Website Lumen Operational Procedure	This is covered in the Lumen Complaint Policy on page 13 which is published on the website. It is also covered within the Lumen Complaints

			Lumen Staff Complaints Guide	Operational Procedure and the Lumen Staff Complaints Guide
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>Lumen Complaints Policy</p> <p>Website</p> <p>Lumen Operational Procedure</p> <p>Lumen Staff Complaints Guide</p>	<p>This is covered in the Lumen Complaint Policy on page 13 which is published on the website. It is also covered within the Lumen Complaints Operational Procedure and the Lumen Staff Complaints Guide</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Lumen Complaints Policy</p> <p>Website</p> <p>Lumen Operational Procedure</p> <p>Lumen Staff Complaints Guide</p>	<p>This is covered in the Lumen Complaint Policy on page 13 which is published on the website. It is also covered within the Lumen Complaints Operational Procedure and the Lumen Staff Complaints Guide</p>

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; • 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. 	Yes	<p>Lumen Complaints Policy Website</p> <p>Lumen Compensation Policy</p> <p>Lumen Staff Complaint Guide</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Evaluation Forms</p>	<p>This is covered in the Complaint Policy on pages13/14 which is published on the Lumen Website.</p> <p>The staff complaints guidance covers a section on 'putting things right' and makes reference to this throughout the document. There are links to the Lumen compensation policy and the Housing Ombudsman Guidance on Remedies.</p> <p>On completion of a complaint, an evaluation will be completed to assess the root cause of the complaint, what lessons have been learned and what, if any, actions need to be taken to prevent reoccurrence.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Lumen Complaints Policy	<p>This is covered in the Complaint Policy on page 14 which is published on the Lumen website.</p>

			<p>Website</p> <p>Lumen Complaints Operational Procedure</p> <p>Lumen Staff Complaint Guidance</p>	<p>It is also covered within the Lumen Complaints Operational Procedure and the Lumen Staff Complaints Guide</p>
7.3	<p>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.</p>	Yes	<p>Lumen Complaint Policy</p> <p>Website</p> <p>Lumen Complaints Operational Procedure</p> <p>Lumen Staff Complaint Guide</p> <p>Lumen Compensation Policy</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Action Tracker</p>	<p>This is covered in the Complaint Policy on page 14 which is also published on the Website.</p> <p>This is also covered in the Lumen Complaints Operational Procedure and Lumen Staff Complaints Guide which is supported by the Lumen Compensation Policy and Guidance from the Housing Ombudsman on Remedies which are accessible via the 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	<p>Lumen Complaint Policy</p> <p>Website</p> <p>Lumen Complaints Operational Procedure</p> <p>Lumen Staff Complaint Guidance</p>	<p>This is covered in the Complaint Policy on page 14 which is published on the Lumen website.</p> <p>This is stipulated in the Lumen Complaints Operational Procedure and Lumen Staff Complaints Guide</p>
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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>Website</p>	<p>This is stipulated in the Complaint Policy on pages 14 and 16</p> <p>Lumen's complaints performance and service improvement report is published on the website along with the annual self-assessment against the Code</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 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 Service Improvement Report Lumen Website	This is covered in the Complaint Policy on page 16 The service improvement report and governing body response is published on the performance and complaints section of the website
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 covered 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 covered 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 covered 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>Housing Performance Scorecard</p> <p>OMT/SMT Monthly Performance Meetings</p> <p>Service Improvement Report</p>	<p>This is covered in the Scrutiny and Oversight section of the Complaint Policy on page 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 and the Housing Performance Scorecard. The Management Team receive monthly updates on complaints along with identified trends and areas that may need reviewing.</p>

				Regular updates to the MRC are provided on the outcome of complaints.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaint Evaluations</p> <p>H & S Dashboard</p> <p>Housing Performance Scorecard</p> <p>OMT/SMT Monthly Performance Meetings</p> <p>Staff Training and Briefing Sessions</p> <p>Right First Time Training</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 and positive actions taken to improve service delivery.</p>
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>Housing Performance Scorecard</p> <p>OMT/SMT Monthly Performance Meeting</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 and positive actions taken to improve service delivery.</p> <p>Complaints performance, service improvements and</p>

			<p>Service Improvement Report</p> <p>Board Meetings</p> <p>Shareholder Reports</p>	<p>policy updates are shared with the team annually or more frequently if required at training, briefing sessions and team meetings.</p> <p>Complaint information and lessons learnt will be published on the website within the service improvement report</p> <p>Complaints performance and service improvements are reported to the Board and Shareholder Committee</p>
9.4	Landlords must appoint a suitable senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<p>Lumen Complaints Policy</p> <p>OMT/SMT Monthly Performance Minutes</p>	<p>The Senior Lead Person is the Director of Finance & Resources, this is covered in the Complaints Policy on page 16</p>
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	<p>Lumen Complaints Policy</p> <p>H & S Dashboard</p> <p>Housing Performance Scorecard</p>	<p>The Member Responsible for Complaints (the MRC) is the Lumen Board Chair, this is covered in the Complaints Policy on page 16</p> <p>Complaints are reported to Audit Committee via the H & S Dashboard and to the</p>

				<p>Board via the Housing Performance Scorecard.</p> <p>Complaints are reviewed on a case by case basis by the MRC.</p>
9.6	<p>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.</p>	Yes	<p>Lumen Complaints Policy</p> <p>H & S Dashboard</p> <p>Housing Performance Scorecard</p> <p>Board Minutes</p>	<p>The Member Responsible for Complaints (the MRC) is the Lumen Board Chair, this is covered in the Complaints Policy on page 16</p> <p>Complaints are reported to Audit Committee via the H & S Dashboard and to the Board via the Housing Performance Scorecard.</p> <p>Complaints are reviewed on a case by case basis by the MRC.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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; 	Yes	<p>Lumen Complaints Policy</p>	<p>The Member Responsible for Complaints (the MRC) provided with the requirements covered in this code provision, this is stipulated on page 16 in the Complaints Policy</p> <p>Complaints are reviewed on a case by case basis by the MRC.</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>		Service Improvement Report	<p>Updates on the outcomes of the Ombudsman investigations are provided to the MRC via meetings with the Interim CEO</p> <p>The annual complaints performance and service improvement report is provided to the MRC. The MRC response to this report is published on the performance and complaints sections of the Lumen Website</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>	Yes	<p>Lumen Complaints Policy</p> <p>Lumen Complaint Handling Staff Training Slides</p> <p>Team Meetings</p> <p>OMT/SMT Monthly Performance Meeting</p>	<p>This is covered in the Complaint Policy on Page 16.</p> <p>Lumen Complaint Handling Staff Training Sessions</p> <p>A collaborative approach to complaint handling and right first time training has equipped the team to resolve issues at the earliest opportunities and to take responsibility for issues as the first point of contact, to see this through to the</p>

				end whilst working across teams. There is a 'no blame' culture but a lesson's learnt and what needs to change approach.
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