

2023/24 ANNUAL COMPLAINTS PERFORMANCE & SERVICE IMPROVEMENT REPORT

At its meeting in May 2024 the Board received the first Annual Complaints Performance and Service Improvement Report under the new Housing Ombudsman Service Complaint Handling Code.

The Board noted that the performance levels and improvement actions had also been reviewed by the Customer Experience Committee and the self-assessment against the Code had been reviewed by the Audit, Risk and Assurance Committee.

The Board confirmed that complaints provide an important source of customer feedback and learning and that Coastline maintains a positive complaint handling culture. Whilst the Board acknowledged the good complaint handling performance during the year, the Board urged that lessons continue to be learned and implemented to improve service delivery.

However, the Board recognised that achieving the Housing Ombudsman Complaint Handling Code timeframes for handling complaints remained challenging and will continue to focus on this area of service delivery without compromising on the quality of complaints handling.

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Executive Summary

- A. On 8 February 2024 the Housing Ombudsman Service (HOS) published an updated Complaints Handling Code (the Code), which became statutory on 1 April 2024, under the Social Housing (Regulation) Act 2023. There is now a legal duty placed on the HOS to monitor compliance with the Code, regardless of whether it receives individual complaints from customers about a landlord. For the first time landlords will need to submit their self-assessment against the Code annually to the HOS, at the same time as their Tenant Satisfaction Measures data return to the Regulator of Social Housing. For Coastline this will be by 30 June 2024.
- B. To ensure compliance against the new Code, following consultation with the Customer Experience Committee (CEC), the Board approved an updated Complaints Policy on 27 March 2024, which came into effect on 1 April 2024.
- C. The Board has previously approved the Chair of CEC to act as the nominated member of the Board to lead on complaints, as required by the 2022 Code. Under the 2024 Code the CEC Chair will retain ownership of this role, now referred to as the “Member Responsible for Complaints” (MRC).
- D. The Board has previously been informed that one new expectation within the Code is that the HOS requires an Annual Complaints Performance & Service Improvement Report (the Annual Report) be reported to the Board and published on the complaints section of Coastline website together with the Boards “response to the report.”
- E. In addition, the HOS expects the Annual Report (Appendix 1 to this cover report) to include;
- An annual self-assessment against the Code (Appendix A of the Annual Report)
 - A qualitative and quantitative analysis of Coastline’s complaint handling performance (Section 2 & 3 of the Annual Report and Appendices B - E).
 - A summary of the types of complaints Coastline has refused to accept (Section 7.5 of the Annual Report);
 - Any findings of non-compliance with the Code by the HOS (there have been no findings of non-compliance with the Code, but Section 7 of the Annual Report includes recommendations for improvement in relation to one case);
 - The service improvements made as a result of the learning from complaints (Section 4 of the Annual Report and Appendix E);
 - Any annual report about the landlord’s performance from the HOS (there have been no annual reports received, this is confirmed at Section 7 of the Annual Report); and
 - Any other relevant reports or publications produced by the HOS in relation to the work of the landlord (Section 8 of the Annual Report).
- F. As with previous annual complaint reports, the CEC reviewed the Annual Report at the April meeting and support its submission to Board. The version of the report submitted to CEC included commentary on the number of service requests, level and number of gestures of goodwill payments, confirmation that there were no strategic risk implications and numbers of compliments received. These have not been included in the version submitted to Board for publication to the website as the HOS does not require such information to be included.
- G. The HOS self-assessment was reviewed by the Audit, Risk and Assurance Committee as part of the annual compliance reporting process and support its submission to Board.

- H. During the year 2023/24 Coastline received;
- 398 initial expressions of dissatisfaction of which 14 progressed to Stage 1;
 - 92 complaints across all stock types;
 - 75 Stage 1 complaints, (62 in 2022/23); and of these
 - 17 requests to escalate to Stage 2, which includes one from 2022/23 (15 in 2022/23)
- I. In terms of complaint investigation timescale performance;
- 66 complaints at stage 1 were closed, of which;
 - 71% closed within policy timeframe, including where an extension was agreed
 - 5% closed outside agreed extension times
 - 24% closed outside policy timeframes, with no extension agreed
 - 10 complaints at stage 2 were closed, of which;
 - 100 % closed within policy timeframe, including where an extension was agreed
- J. Of the 92 Stage 1 and Stage 2 complaints received across all stock types, 57 related to our Low Cost Rental Accommodation (LCRA) stock for Tenant Satisfaction Measures (TSMs) performance reporting.
- K. During the year two cases were referred to HOS for independent review during 2023/24 with service failures identified and recommendations made for one case. No maladministration findings were found for either case.
- L. Overall 68 improvements and commitments were identified as a result of issues raised by customers during the year with 29 being identified in advance of an investigation at Stage 1.
- M. Results from the 2023 TSM survey conducted by Acuity showed complaint handling to be the area customers told us they are less satisfied with and an improvement plan has been developed and is being implemented.
- N. Six new disrepair claims were received during the year and there are currently seven 'live' cases.
- O. Based upon the content of the Annual Report and in the view of the Chair of the CEC (in her role as MRC under the Code), the Board is invited to consider the following response for publication;

“At its meeting in May 2024 the Board received the first Annual Complaints Performance and Service Improvement Report under the new Housing Ombudsman Service Complaint Handling Code. The Board noted that the performance levels and improvement actions had also been reviewed by the Customer Experience Committee and the self-assessment against the Code had been reviewed by the Audit, Risk and Assurance Committee. The Board confirmed that complaints provide an important source of customer feedback and learning and that Coastline maintains a positive complaint handling culture. Whilst the Board acknowledged the good complaint handling performance during the year, the Board urged that lessons continue to be learned and implemented to improve service delivery.”

Annual Complaints Performance and Service Improvement Report

Details

1.0 Introduction

- 1.1 This report has been prepared in response to the expectation within the Housing Ombudsman Service (HOS) Complaint Handling Code 2024 that an annual complaint performance and service improvement report is published on Coastlines website by the 30 June each year.
- 1.2 In addition, the HOS requires that Coastline publishes our own self-assessment against the Code. This is included at Appendix A.
- 1.3 The complaint handling process followed by Coastline and the terminology referred to in this report is explained in detail with the Group Complaints Policy itself, available on the website, and is not repeated in full within this report.
- 1.4 If you require any additional information in relation to the contents of this report or the Group Complaints Policy then please contact complaints@coastlinehousing.co.uk
- 1.5 The period of operation covered by this report is 1 April 2023 to 31 March 2024.
- 1.6 Of the 92 Stage 1 and Stage 2 complaints received across all stock types, 57 related to our Low Cost Rental Accommodation stock for Tenant Satisfaction Measures Performance reporting.
- 1.7 The findings included in this report have been reviewed by the Executive Team, the Customer Experience Committee (CEC) and the Board.

2.0 Stage One Complaints 2023/24

- 2.1 The overall summary of Stage One complaint numbers for the year is:
- 75 complaints received, of which;
 - Nine complaints remained under investigation at year-end (one since completed) with eight in relation to the same freehold sewage treatment plant service charges;
 - 66 complaints were investigated and closed, of which;
 - 50 (77%) were closed at Stage One;
 - 17 progressed to Stage 2 including one complaint received in the previous year (14 had been partially or fully upheld at Stage One);
 - 48 (73%) were either fully or partially upheld at Stage One;
 - 88% in 2022/23, 85% in 2021/22, 81% in 2020/21 and 86% in 2019/20.

The number of complaints partially or fully upheld on an annual basis reflects our open, honest and accountable culture and our desire to listen and learn from our customers' feedback.

- 2.2 An analysis of complaints received and resolved by stage, broken down by tenancy type is included at Appendix B, whilst the outcome of issues raised are shown at Appendix C. A breakdown by nine over-arching categories for classifying cases is given below.

Category of Cases Raised in 2023/24		
Category	Stage 1	Stage 2
Communication	28	5
Damp & Mould	10	2
Delay	2	0
Disrepair	1	0
Policy	2	0
Procedure (to include Anti-Social Behaviour Complaint Handling)	9	5
Quality of repair / defects	8	1
Quality of service	5	1
Staff	10	3
Totals	75	16

2.3 The analysis of the number of complaints closed within the year and whether these were closed within the Code timeframe and if extended, whether this was in agreement with our customers is included in Appendix D, the summary being;

- 48% closed within policy timeframe, without need for an extension;
- 23% closed within policy timeframe, with the need for an extension;
- 5% closed outside agreed extension times; and
- 24% closed outside policy timeframes, with no extension agreed.

2.4 Investigating managers have been reminded of the need to ensure the ten working days timeframe is adhered to unless there is justification for an agreed extension. Heads of Service and senior managers are being regularly reminded that if it is not possible to send a reply within the ten working days, to ensure that our customers are kept regularly updated. The system and processes in place also support this approach.

3.0 Stage Two Complaints 2023/24

3.1 During the year 17 complaints requests were received from customers to progress to a Stage Two Panel Review, including one complaint originally received in 2022/23.

3.2 As at 31 March 2024, 10 Stage Two complaints had been closed. The remaining seven were all completed by the end of April 2024, within the Code timeframes or within extensions agreed with customers.

3.3 The analysis of the number of complaints closed within the year and whether these were closed within the Code timeframe and if extended, whether this was in agreement with our customers is included in Appendix D, the summary being;

- 20% closed within policy timeframe, without need for an extension; and
- 80% closed within policy timeframe, with the need for an extension;

These extensions were due to either co-ordinating availability of the three panel members or at the specific request of customers due to their own availability.

3.4 The number of Panel Reviews undertaken has increased over recent years as outlined below.

Complaints progressed to Panel Review			
2020/21	2021/22	2022/23	2023/24
1	3	15	17

3.5 National Governance networks were approached to assist with benchmarking of complaints progressed to Stage 2, to confirm whether comparable increases were being seen across the

wider sector. Only two companies approached provided information which is shown below:

Year	Coastline % escalated	Company 1, % escalated	Company 2, % escalated
2021-22	9%	6%	8%
2022-23	25%	7%	8%
2023-24	22%	11%	11%

- 3.6 An area for improvement this year will be to review whether complaints which were progressed to Stage 2 could have been, and potentially should have been, resolved at Stage 1 by focussing on panel findings in cases where complaints are upheld and ensuring any changes in process as a result of learning from the findings are implemented by Investigation Managers.
- 3.7 Although there was a significant increase in escalation requests received during quarter four no significant trends were identified;
- ASB handling x 4
 - Staff x 3
 - Communication x 1
 - Disrepair/Damp & Mould x 1
 - Service Charges x 3

4.0 Improvements, Commitments and Learning 2023-24

- 4.1 During the year a total of 68 improvements and commitments were identified as a result of the 75 complaints received within the year. Proactive training continues to focus on identifying areas where improvements can be made to services we provide and the way we provide them.
- 4.2 The number identified in 2023/24 is a significant increase on the 32 identified in 2022/23. There has been significant focus over the last year on encouraging colleagues to identify improvements as part of the early resolution process, before a complaint is reviewed at Stage One. It is therefore extremely encouraging to note that 30 of the 68 improvements and commitments were identified this way.
- 4.3 A total of 59 improvements (in policy or process) or commitments (for remedial actions requiring completion) have been completed within the year. Six were closed during April (within timeframe) and three are now overdue (due for completion by 31 March 2024).
- 4.4 A full breakdown of improvements and commitments identified by service area can be found at Appendix E.
- 4.5 Communication with our customers is a key area where we have previously identified improvements need to be made and therefore commitments made, such as providing a weekly or monthly update in advance of works being carried out, is just as important to our customers as identifying improvements to our services or working practices.
- 4.6 The complaint handling processes within our Customer Relationship Management software reflects our continued commitment to listen to and ‘hear’ our customers and learn from their experience when mistakes have occurred, or services have not been delivered to our expected standards.



5.0 Damp and Mould Complaints 2023/24

- 5.1 As a result of ongoing high-profile cases on national and social media in the last few years there is a consistent focus and scrutiny of landlord complaints by the HOS and the Regulator of Social Housing (RSH), especially in relation to damp and mould.
- 5.2 Of the 10 Stage One complaints reviewed regarding damp and mould (see table at section 2.2), only two progressed to Stage Two for Panel Review. Neither have been progressed to the Ombudsman or as a disrepair claim that we are currently aware of.
- 5.3 One complaint reviewed at Stage Two was rejected as a full Schedule of Works had been put into place at Stage One. The customer had refused entry on multiple occasions to allow these to be carried out, challenged works proposed by both Coastline and our external contractors and was ultimately seeking a direct move to another property. Advice has been provided on options available for a move whilst we continue to try and complete the works proposed.
- 5.4 The other case was in relation to a complaint made regarding the standard of accommodation provided within a self-contained bedsit in our Homeless Service. This complaint related to disrepair (which was rejected by Cornwall Council's Environmental Health Officer), allocation of the property which the customer did not believe met their needs and action taken by several colleagues. The findings at Stage 1 were upheld in relation to property condition and action taken by colleagues. Some additional areas raised by the customer were upheld and improvements put into place in relation to communication with Homeless customers in advance of appointments being made for repairs to be carried out and a small table or desk to be provided for the customer's use.
- 5.5 Following the introduction of a dedicated Damp and Mould Team during 2023 and training cascaded out across the Group, very few issues raised progress into the complaints process with the vast majority being resolved by the Team in line with the Damp, Mould and Ventilation Policy approved by the CEC in July 2023.

6.0 Disrepair Claims 2023/24

- 6.1 During the year Coastline received six disrepair claims (four received in 2022/23), one of which was subsequently withdrawn by the customer. At year end there were seven 'live' cases as outlined on Appendix F, one of which has subsequently been closed.
- 6.2 The number received each year is likely to continue to increase due to awareness through public and social media platforms and direct marketing by disrepair claim solicitors.
- 6.3 Although we proactively contact customers who have made a disrepair claim to make them aware of the complaints process they are generally advised by their solicitors not to engage in the complaints process.
- 6.4 Our standard approach when advised a claim has been started is to seek legal advice, contact the customers, visit the property to assess and take photos, then progress any works required as quickly as possible. We then keep in regular contact with the customer. Over the years most organisations in the sector seemed to have relied on lawyers to move these forward which resulted in further delays, poor customer service and ultimately more risk.
- 6.5 A Disrepair Policy was reviewed and approved by the CEC in July 2023.

7.0 Complaint Escalation to Housing Ombudsman Service 2023/24

- 7.1 During the year two complaints were referred by customers to the HOS for independent review. Both had originally been received and reviewed through our complaints process during 2022/23.
- 7.2 One case was in relation to our handling of an application for housing as well as the applicant's banding and communication. The HOS determination was received in September 2023 and found no maladministration or service failures.
- 7.3 The second case was in relation to anti-social behaviour handling. The HOS determination was received in December 2023. Although no maladministration was identified, service failure was identified in relation to our handling of anti-social behaviour, complaint handling and record keeping.
- 7.4 Recommendations were made by the HOS as follows:
- An award of £150 to be paid to the customer (*completed*);
 - A risk assessment to be completed within four weeks in accordance with our Anti-Social Behaviour Policy (*completed*).

In addition, Coastline was asked to:

- Review its record keeping in line with the HOS's Spotlight report on Knowledge and Information Management (*ongoing by a dedicated Data Quality Sub-Group*);
 - Review its ASB Policy, specifically in relation to action plans and what these should contain (*completed*);
 - Provide training to all staff in relation to when a risk assessment is necessary and what it is expected to contain (*completed*).
- 7.5 In addition, one complaint was made to Coastline which we declined to progress as it fell within the exceptions outlined within the Complaints Policy. The customer contacted the HOS who requested that Coastline progress the issues raised through our complaint's procedures. This was completed in early April 2024 having been through our two stage complaints procedures. To date there has been no further contact from the HOS in relation to this case.
- 7.6 There is one other case we are currently aware of which has been referred to the HOS in 2024/25. Preliminary information was provided to the HOS on 15 April 2024 and the HOS has advised that a decision will be made whether or not to accept the complaint for independent review in the next six months. Therefore, no update is expected until the end of 2024.
- 7.7 Coastline has not received any annual reports from the HOS regarding complaint handling performance.

8.0 Housing Ombudsman Service Publications

- 8.1 During the year the HOS has released the following Spotlight reports which are being progressed internally with action plans and working sub-groups:
- May 2023 - Knowledge and Information Management (KIM) [Knowledge and Information Management \(KIM\) | Housing Ombuds \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk/knowledge-and-information-management-kim/)
 - January 2024 – Attitudes, Respects & Rights [Spotlight on: Attitudes, respect and rights – relationship of equals \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk/spotlight-on-attitudes-respect-and-rights-relationship-of-equals/)

- 8.2 The KIM Report is a significant piece of work involving an in-depth review of how data is created, stored, used and shared with 21 recommendations made by the HOS. This is being progressed by a Data Governance sub-group to include the Operational Risk and Performance Team, Director of Finance, People and Change, Head of ICT, Customer Voice and Experience Manager and Assistant Company Secretary. The Group is being supported by a Non-Executive Director who is also a member of the Audit, Risk & Assurance Committee and who has extensive expertise in the area of IT systems and programmes.
- 8.3 The more recently released Attitudes, Respects and Rights report included 23 recommendations regarding identifying, recording and reacting positively to our customers' needs and vulnerabilities is being progressed by the Customer Voice and Experience Manager and the Operational Risk and Performance Team. A customer vulnerability policy is in development, for consideration by CEC at the July 2024 meeting.
- 8.4 As well as Spotlight Reports, the HOS released quarterly Insight reports regarding complaints referred for independent review. These include a selection of case studies and key learning points. The Complaints and Compliments Team keep these under review.
- 8.5 As well as Spotlight and Insight Reports, the Complaints and Compliments Team regularly reviews all decisions and findings published by HOS and retains a record of those where financial awards are made to customers. This information is used as a benchmark to ensure any goodwill gestures made by us are, at least, comparable and in line with HOS awards made.
- 8.6 In addition, all findings and decisions made are reviewed and shared, where appropriate, with Heads of Service to highlight recommendations made and lessons we can learn from, to make further improvements to our service delivery.

9.0 Customer Consultation and Training

- 9.1 Customer consultation and the impact on customers on the way our services are delivered is at the heart of the Complaints Policy. Feedback is always welcome as we strive to deliver a top-quartile service seeking new ways to reach out to customers and to listen and learn from their experience.
- 9.2 On a quarterly basis CEC receive a detailed update on complaint performance and highlights are also shared with Customer Voice (CV) members at subsequent quarterly meetings.
- 9.3 Mentors were assigned to three customers who had made complaints during the year to support them during their complaint journey. Although this does not represent a high take-up the role remains a key support tool for those customers who are potentially vulnerable or potentially isolated and do not have family or friends available who can offer direct support.
- 9.4 Complaint Mentors receive training on the Complaints Policy and internal procedures as well as GDPR, Customer Service and safeguarding in order to be able to offer support to our customer. Both Mentors and CV members are invited to attend colleague complaint training sessions to gain further insight into the culture we establish for all new and existing colleagues.
- 9.5 As part of the recent review of the Complaints Policy and following feedback received from Customer Mentors over the last year, a robust Framework has been put into place to support and provide clarity to Mentors on their role and support available to them whilst they support customers. The new framework came into effect from 1 April 2024.
- 9.6 An article on complaints and improvements identified is also included in each copy of the Autumn Customer newsletter.

- 9.7 One of our CV Members, who is also a Complaint Mentor, is also on the HOS national customer consultation panel.
- 9.8 During the forthcoming year the second Tenant Satisfaction Measures survey will take place which will include additional insight questions into complaints. In addition, from 1 April 2024 all transactional surveys are being sent to customers advising them how they can make a complaint if they remain dissatisfied with the service received.



Housing Ombudsman Service Complaint Handling Code 2024 Self-Assessment

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	Section 5.1 of the Group Complaints Policy states: Under the Housing Ombudsman Complaint Handling Code a complaint is defined as <i>“an expression of dissatisfaction, however made, about the standard of service, action or lack of action taken by us, affecting an individual, a customer or group of customers.”</i>	
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	Section 4.1 of the Group Complaint Policy states: When we are unable to resolve issues straight away at the first point of contact (as ‘business as usual’) the case will be forwarded to the Complaints & Compliments Team as a ‘Service Request/Failure’ and will be assigned to the relevant service manager to try and resolve with the customer within four working days, if the customer is in agreement with this proposal. However, if a customer is not in agreement the matter will be taken forward as a Stage 1 complaint.	In depth training is provided as mandatory to all new colleagues and as refresher training every 2 years to all other colleagues. This provides advice and guidance on how to deal with issues of dissatisfaction and how to respond/take immediate action to try and resolve to the customer’s satisfaction or progress to the Complaints Team. All complaints however received, whether direct from a customer, their representative or a third party are passed to the Complaints and Compliments team for processing through our Customer Relationship Management software.



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	See Evidence under 1.3 above	<p>As allowed for within the Code, Coastline differentiates from requests for service (referred to in the Policy as service failures) and complaints. This difference needs to be made clearer within the Policy.</p> <p>Service failures are recorded for trend and monitoring purposes and performance is reported quarterly and annually to the Group Customer Experience Committee and Common Board.</p>
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	See Evidence under 1.3 above.	
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	<p>All customer surveys contain the following wording:</p> <p>“Thank you for taking the time to give us feedback about your recent experience. If you are dissatisfied with our services, you can raise a complaint with us.</p>	



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	Section 6.1 of the Group Complaints Policy state: Complaints will be accepted unless there is a valid reason not to do so. Each complaint must be considered on its own merits and if not accepted the reasons for not doing so will be explained to the customer and be evidence based.	Example in Jan 2024 where Coastline in lien with the Policy did not accept a complaint. The customer raised the issue with the HOS, who instructed Coastline to accept the complaint. Coastline accepted the instruction from the HOS and past the complaint through both Stages 1 and 2.
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: <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	Section 6.0 of the Group Complaints Policy sets out Exclusion of Complaints.	
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	Section 6.2 of the Group Complaints Policy states: Complaints should be made as soon as possible and no more than 12 months after the event to enable a robust and thorough investigation to take place. Complaints made after 12 months may be considered on a case-	Phone records are retained for a period of six months – this could make investigating cases which are reported after this time has elapsed more difficult.



			by-case basis, where there is good reason to do so.	
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	See Evidence under 2.1.	In the event that a complaint is not accepted customers are directed to the Ombudsman for advice and support. See section 2.1
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	See Evidence under 2.1.	

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>Complaints can be made in any format which the customer wishes to use. Section 7.1 of the Group Complaints Policy includes;</p> <p>A complaint can be made in any reasonable format such as; in person, in writing via a complaint form, by letter, email, through the website, portal ('My Coastline'), by telephone or a third-party in cases where this is justified. Colleagues can also be made available to assist in the completion of complaints forms and in certain circumstances, reviewed on a case-by-case basis, we can arrange for a colleague to meet a customer at home to take the details of their complaint.</p>	Under the policy Complaint Mentors (volunteer Involved Customers) are made available to customers should they wish to be supported.



			<p>Section 1.3 of the Group Complaints Policy states:</p> <p>Coastline will make reasonable adjustments for individuals where appropriate under the Equality Act 2010 as well as maintaining a record of any disabilities, vulnerabilities or risk an individual has disclosed. Any agreed reasonable adjustments will be kept under active review.</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.	Yes	See Evidence under 3.1	All staff receive mandatory and refresher Complaint's training on the Complaints Policy and Procedures to include how customers can make a complaint.
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>Customers are made aware of how a complaint can be made and are provided with complaint performance data and learning and improvements arising from complaints via:</p> <ul style="list-style-type: none"> • Information on the website; • Updates in the annual Autumn Customer Newsletter • Annual Report • Social Media 	
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>Coastline's website has a dedicated page on Complaints, to include our approach, the two stage process, timeframes and information on the Ombudsman and Social Housing Complaints.</p> <p>Website link: Complaints</p>	



			The Group Complaints Policy is published on the website: Group Complaints Policy	
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	See Evidence under 3.4.	
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	Section 8.11 of the Group Complaints Policy, in relation to Stage 2, states: The complainant is welcome to be accompanied at the Panel Review by a Complaint Mentor, family member, friend or informal advocate acting or speaking on their behalf or for support, as long as the Assistant Company Secretary is advised in advance who this will be. Section 8.12 further states: In addition, the complainant may be accompanied at the Panel Review by an individual acting as a professional advisor to them on technical matters, for cases that are considered to be of a complex technical nature. This is to be considered on a case-by-case basis and is subject to prior written approval by the Complaints & Compliments Team.	In addition, although not acting as representative of the customer Section 9.0 provides for; At any point during the process a customer can ask for a 'Complaint Mentor' to be assigned to them to help and support them through the process. Mentors are trained volunteers who are actively involved in the Customer Voice. Although not explicitly mentioned in the Group Complaints Policy, at Stage 1 customers are in practice allowed to be represented along the same lines as mentioned in the Policy for Stage 2 complaints. This will be made clear at the next revision of the policy.
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	Information and contact details for the Ombudsman Service is provided on the website and at every stage of communication with the Complaints Team, from the start of the process (service failure/request) through to resolution or referral to the Ombudsman.	Plain English guidance titled 'Made a complaint? What happens now?' is provided to each customer who raises an issue with the Complaints Team.



We also mention in our replies to customers alternatives for redress when the HOS is not the relevant organisation.

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>There is a Complaints Team in place consisting of the Head of Governance, Risk & Assurance, Company Secretary and Governance Assistant.</p> <p>The Assistant Company Secretary is the lead contact for the Ombudsman as 'Complaints Officer' and has responsibility to provide performance reports to the governing body, colleagues (to include all training) and all customers.</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	The Complaints Officer has access to assign Stage 1 complaints to all senior managers including for Stage 2 panels (see evidence at 6.13) to Executive Directors, members of the Board and customer members of the Customer Experience Committee	Learning from Ombudsman Spotlight and Insight Reports as well as 'decisions' made is shared by the Complaints Officer with relevant senior managers and Executive Directors (and where relevant Board) to ensure processes are reviewed and improvements are identified and progressed.
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>Complaints are reviewed by senior managers at Stage 1 and Executive Directors at Stage 2 to ensure priority and senior level focus.</p> <p>All new and existing staff (to include all senior managers and Executive</p>	Training provided includes the background to the Code and regulatory compliance and the need to continually improve our service delivery for all customers going forward.



			Directors) receive mandatory and refresher training on the Complaints Policy and Procedures to include the importance on identifying improvements for the benefit of all customers.	All investigating (senior) managers receive further dedicated training on our complaints processes to ensure clarity on areas of focus such as tools for resolution, timeframes, extensions and identifying and recording commitments and improvements to customers. Advice, guidance and assistance is available from the Complaints on an ad-hoc basis at any time.
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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	Coastline has a single, dedicated Complaints Policy in place.	
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	The Group Complaint Policy consists of a two-stage process.	As allowed for within the Code, Coastline differentiates from requests for service (referred to in the Policy as service failures) and complaints.
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	Coastline has a two-stage complaint handling process in place.	
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	All complaints in relation to services provided by Coastline to include all third parties are dealt with via Coastline's Complaints Policy.	Under a management agreement with Legal & General properties where tenants are the customers of L&G, Stage 1 complaints are dealt with via Coastline's Group Complaints Policy. Stage 2 complaints from Legal & General customers are dealt with direct by Legal & General if not resolved at



				Stage 1 through Coastline’s Complaints Policy and feedback on their findings is provided.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See Evidence under 5.4.	
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	Stage 1 and Stage 2 Complaint acknowledgements set out the definition of the complaint and the resolution the customer is seeking. Where this is not clear the customer will be asked to provide clarification and is summarised within the Customer Relationship Management programme (CRM) case as part of the ‘acknowledge, define and log’ step.	It should be noted that although the Code requires landlords to set out their understanding of the complaint and the outcomes the customer is seeking, the Code also states “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.” Coastline
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	Complaint acknowledgements will set out any areas within the complaint definition which fall outside of Coastline’s control or remit, ie services provided by external providers such as a Local Authority.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; 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	All investigating (senior) managers receive training on the Complaints Policy and Procedures and are suitably qualified and experienced to provide a high-level review of the issue and the relevant processes behind these in line with Coastline’s strategies and policies. Where changes or improvements are identified they have the authority to be able to put action plans into place and take these forward.	



<p>5.9</p>	<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>	<p>Yes</p>	<p>Section 7.5 of the Group Complaints Policy states:</p> <p>Exceptionally, we may provide an explanation to the customer containing a clear timeframe for when the response will be received if it is expected to be longer than within ten working days from acknowledgement, but this should not exceed a further ten working days without good reason. If an extension is required to enable us to respond to the complaint fully, this will be explained to the customer and agreed with the customer if possible. However, we will agree with the customer suitable intervals for keeping the customer informed of progress. In the event of an extension being required the customer will be provided with contact details for the Housing Ombudsman Service.</p>	<p>All staff receive training on complaint timeframes. In addition investigating managers are required to update our Customer Relationship Management software showing where extensions have been advised to customers in addition to how often the customer will be provided with an update on progress.</p>
<p>5.10</p>	<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>	<p>Yes</p>	<p>See Evidence under 3.1.</p>	<p>Our Customer Relationship Management programme includes a record of disabilities and vulnerabilities where these have been declared by customers and those living in their households.</p> <p>Coastline acknowledges that improvements are required in our data capture and recording processes in relation to customer EDI, disability and vulnerability data and working is ongoing to ensure improvements are implemented.</p>



5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	See Evidence under 2.1.	
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	Full records are held for each complaint to include all supporting information within CRM.	Dashboards provide comprehensive performance for each as well as collective complaints for trend, monitoring and training purposes.
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	Coastline has a Goodwill Payments Policy in place which enables colleagues to identify and offer reasonable redress where a customer has been inconvenienced, left out of pocket or to acknowledge where we have not delivered our service to an expected standard.	Colleagues receive training on the Goodwill Payments Policy as part of the Complaints Policy and Procedures Training. This sets out thresholds available to all colleagues and upper limits which require senior management 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.	Yes	The Group Complaints Policy at Sections 7.6 and 8.10 in relation to Stage 1 and Stage 2 complaints respectively makes reference to Coastline's published Acceptable Behaviour Policy which includes reasons why restrictions may be put into place: Acceptable Behaviour Policy	Any restrictions will be reviewed on a six-monthly basis or earlier if the behaviour is resolved sooner.
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	Section 3.2 of the Acceptable Behaviour Policy states: Due regard must be given to implications of the Equalities Act 2010, the Data Protection Act 2018 and the Health and Safety at Work Act 1974.	



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	Section 7.3 of the Group Complaints Policy refers to the initial five working days from receipt of a complaint being used to ensure (amongst other tasks) that a 'definition' of the complaint is established. This step is crucial in assessing the complexity level of a complaint and any other factors which may influence overall response time.	<p>The Complaints and Compliments Team working with the customer and in conjunction with the appointed Stage 1 investigating (senior) managers, together have the ability, expertise and experience to assess the likely complexity on a case by case basis to determine which can be reviewed and resolved as early as possible, including taking into account whether the customer has any identified or declared disabilities or vulnerabilities.</p> <p>Under our Group Complaints policy as part of the mandatory site visit at Stage 1 if an investigating manager becomes aware of any additional difficulties or vulnerabilities (including short-term) our internal records will be updated and assistance will be offered to the customer via internal teams or signposting to external agencies.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<p>Section 7.3 of the Group Complaints Policy states:</p> <p>Complaints will be acknowledged in writing, defined and logged within five working days of being received, by the Complaints and Compliments Team who will manage and oversee the complaint process. The acknowledgement will confirm which colleague will be acting as the</p>	



			Investigating Manager who will be dealing with the complaint together with our understanding of the complaint and the outcomes the customer is seeking (the 'complaint definition').	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Section 7.4 of the Group Complaints Policy states: The target timeframe for investigating and responding to a complaint is within ten working days from the date of acknowledgement.	
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	Section 7.5 the Group Complaints Policy states: Exceptionally, we may provide an explanation to the customer containing a clear timeframe for when the response will be received if it is expected to be longer than within ten working days from acknowledgement, but this should not exceed a further ten working days without good reason. If an extension is required to enable us to respond to the complaint fully, this will be explained to the customer and agreed with the customer if possible. However, we will agree with the customer suitable intervals for keeping the customer informed of progress. In the event of an extension being required the customer will be provided with contact details for the Housing Ombudsman Service.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be	Yes	See Evidence under 6.4.	



	provided with the contact details of the Ombudsman.			
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 7.8 of the Group Complaints Policy states: Once the investigation has been completed (including any site visit) the Investigating Manager will provide the complainant with a full written response re-confirming our understanding of the complaint and what outcomes the customer was seeking and outlining what actions have or will be undertaken by Coastline and expected timeframes for any outstanding actions. This will include an outline of where learning and improvements have been identified as a result of the complaint received.	Outstanding actions and improvements are tracked via the 'commitments and improvements' page on our Customer Relationship Management programme. Tasks/prompts are raised to ensure customers are provided with timely updates through to completion of all works.
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	See Evidence under 6.6.	Training is provided to all colleagues to include providing clear reasons for decisions made and referencing relevant policy, law and good practice where relevant.
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		Although not specified in the Policy or Procedures we allow customers to bring additional points into either a Stage 1 or Stage 2 investigation (where Stage 1 has been concluded) if these relate to the same or similar issue.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	Yes	This is outlined in the standard reply template issued to all investigating managers at Stage 1.	



	<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. 		<p>Details of how to request escalation to Stage 2 are provided in the complaint closure letter sent independently by the Complaints Team.</p>	
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Section 6: Complaints Stages – Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	<p>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.</p>	Yes	<p>Section 8.1 of the Group Complaints Policy states:</p> <p>Whether a complaint has been upheld or rejected at Stage 1 or any remedial works / actions have been completed or remain outstanding should the customer remain dissatisfied in whole or in part they will be advised they can request progression to Stage 2.</p>	
6.11	<p>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.</p>	Yes	<p>Section 8.7 of the Group Complaints Policy states:</p> <p>A request for progression to Stage 2 will be acknowledged in writing, defined and logged by the Complaints & Compliments Team within five working days of being received. The acknowledgement will confirm who the panel members will be with a proposed date for the Panel Review, together with our</p>	



			understanding of the complaint and the outcomes the customer is seeking (the 'complaint definition').	
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	Section 8.3 of the Group Complaints Policy states: There is no template form that is required to be completed when customers are requesting progression to Stage 2. Customers are not required to explain why they remain dissatisfied although this is helpful to provide the Panel at Stage 2 with a better understanding of areas for focus in advance of the Panel Review taking place.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 8.5 of the Group Complaints Policy states: Upon escalation to Stage 2, the complaint will be reviewed by a Panel of three, namely one Executive Director, one Customer Member from the Customer Experience Committee and one Non-Executive Director who will Chair the Panel. The Executive Director will usually be independent to the service directorate to emphasise that an open, honest and fair review is undertaken. In complex or detailed technical cases it may assist the customer and the panel process by having the service Executive Director participate in the panel for complaints arising within their service area.	



6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 8.8 of the Group Complaints Policy states: The overall target timeframe for a Panel Review to be held and a written response provided is within twenty working days from the date of acknowledgement at Stage 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.	Yes	Section 8.9 of the Group Complaints Policy states: Exceptionally, we may provide an explanation to the customer containing a clear timeframe for when the response will be received if it is expected to be longer than within 20 working days from acknowledgement, but this should not exceed a further 20 working days without good reason. If an extension is required to enable us to respond to the complaint fully, this will be explained to the customer and agreed with the customer if possible. However, we will agree with the customer suitable intervals for keeping the customer informed of progress. In the event of an extension being required the customer will be provided with contact details for the Housing Ombudsman Service.	
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	See Evidence under 6.15.	



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	<p>Section 8.14 of the Groups Complaints Policy states:</p> <p>The Panel Chair will send a written response to the complainant, giving the outcome of the Panel’s findings with a copy of the Notes taken, and where appropriate highlighting remedial actions to be carried out and any significant changes to Coastlines processes or procedures which will be used to improve future service delivery.</p>	Outstanding actions and improvements are tracked via the ‘commitments and improvements’ page on our Customer Relationship Management programme. Tasks/prompts are raised to ensure customers are provided with timely updates through to completion of all works.
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	See Sections 8.14 & 8.15 of the Group Complaints Policy in relation to a written response.	<p>Detailed replies are sent to customers following the conclusion of Stage 2. These clearly set out the issues raised by the customer and each point is covered individually. Clear reasons are provided for the Panel’s findings referencing relevant policy, law or good practice as well as remedial actions, improvements identified, and reasonable redress (if appropriate) in line with Ombudsman decisions and Guidance on Remedies.</p> <p>The Stage 2 letter confirms our internal procedures have been concluded and signposts customers to the Ombudsman should they remain dissatisfied.</p>
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; 	Yes	See Sections 8.14 & 8.15 of the Group Complaints Policy in relation to a written response.	See commentary under 6.18.



	<p>d. the reasons for any decisions made;</p> <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	<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>See Section 8.5 of the Group Complaints Policy in relation to assessment involving an independent panel.</p>	<p>At Stage 2 the Panel will undertake an independent investigation which will include speaking to Executive Directors and Heads of Service as appropriate to ensure they have all the information/evidence required before coming to a conclusion.</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>Section 2.5 of the Group Complaints Policy states:</p> <p>Complaints are acknowledged as a form of feedback and by investigating and acting on them we will learn from our customers. Where mistakes have been made and where impacts have arisen, we will ensure that these are rectified to the satisfaction of the customer, wherever possible and that the circumstances do not recur. We will also ensure that the customer is not financially worse off as a result of the complaint and will make amends where this has happened to ensure the customer is returned to the same</p>	<p>Detailed training is provided to all colleagues on the Complaints Policy and Procedures and the expectations of investigating managers. Colleagues are encouraged and expected to apologise, acknowledge when something has not gone well, take action and retain ownership until the issue has been resolved, to the customer's satisfaction. As part of this colleagues receiving training on the 'tools' available to them to resolve issues at the first point of contact and to provide financial remedies where these are reasonable. Identifying, sharing and reporting improvements and commitments are a key part of our training and ongoing learning.</p>



			<p>position as they were before the incident occurred.</p> <p>Section 2.2 of Policy states:</p> <p>This Policy is a key element of our overall approach to customer care and Coastline’s values for putting our customers first and being open, honest and accountable. As part of ‘striving to be the best’ it is important that we identify issues and work as a team to both rectify the initial cause of a complaint as well as learning from the mistake so as to avoid repeating it</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Section 7.7 of the Group Complaints Policy states:</p> <p>In line with our vision and values and ‘<i>seeing the person</i>’ Investigating Managers are asked to review the impact of the reported situation on individual customers and if they believe it necessary to take action outside of our standard policies and procedures to find a reasonable solution to the problem for that particular customer. Investigating Managers will be of a suitably senior position with the relevant experience and expertise to ensure they are able to identify the small number of cases, where our standard policy or procedure may not be appropriate for an</p>	



			individual customer in a particular situation. The Goodwill Payments Policy is in place to rectify any financial loss and compensate customers for inconvenience, distress and any additional impact on their physical or mental wellbeing.	
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	Stage 1 and Stage 2 findings will set out any remedy proposed with either deadlines for these to be completed or, in agreement with the customer, timeframes for updates to be provided.	Any financial redress offered and accepted will be actioned for payment straight away.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Guidance on Remedies and Decisions made by the Ombudsman are regularly reviewed by the Assistant Company Secretary to ensure any redress offered is at least in line with Ombudsman expectations.

Section 8: Putting things right

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: <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; 	Yes	Quarterly and Annual Complaints Performance Reports are submitted to the Group Customer Experience Committee, and annually to the Board. From 2024 this will include the Ombudsman Self-Assessment in line with expectations of the updated Code. In any event the Ombudsman Self-Assessment has previously been and will continue in future to be	Quarterly and Annual Performance Reports include analysis of data for all complaints received, trends, timeframes and extensions, percentage upheld, improvements and commitments identified and financial redress awarded. These reports also include data on service failures. An analysis of complaints referred to the Ombudsman are included with findings where these have been received.



	<ul style="list-style-type: none"> 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. 		<p>reviewed annually by the Group Audit, Risk & Assurance Committee as part of the Annual Compliance Report.</p>	<p>Ombudsman Spotlight and Insight Reports are also reported with action plans.</p>
8.2	<p>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.</p>	Yes	<p>See Evidence under 8.1.</p> <p>The ombudsman Self-Assessment has previously been and will continue in future to be uploaded onto the website.</p> <p>From 2024, once approved by the Board the Annual Complaints and Service Improvement Report and Self-Assessment will be uploaded onto the website along with the Board response.</p>	
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	<p>Not applicable during the current reporting year</p>	<p>Noted in case of any future significant restructure, merger and/or change to procedures planned.</p>
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes	<p>Not applicable during the current reporting year</p>	<p>Noted in case of any future review and direction received from the Ombudsman.</p>
8.5	<p>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.</p>	Yes	<p>Not applicable during the current reporting year</p>	<p>Noted in case of any future cyber-incident or other exceptional circumstances.</p>



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>Section 2.2 of the Group Complaints Policy states:</p> <p>This Policy is a key element of our overall approach to customer care and Coastline’s values for putting our customers first and being open, honest and accountable. As part of ‘striving to be the best’ it is important that we identify issues and work as a team to both rectify the initial cause of a complaint as well as learning from the mistake so as to avoid repeating it</p>	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Section 2.2 of the Group Complaints Policy states:</p> <p>This Policy is a key element of our overall approach to customer care and Coastline’s values for putting our customers first and being open, honest and accountable. As part of ‘striving to be the best’ it is important that we identify issues and work as a team to both rectify the initial cause of a complaint as well as learning from the mistake so as to avoid repeating it.</p> <p>Our complaints process is designed to be:</p>	



			<ul style="list-style-type: none"> • Inclusive, accessible, easy to use and understand; • Be a straightforward two stage process, each of which are clearly set out; • Effective and timely; • Objective, with provision for independent investigation, if necessary; • Confidential; • Comprehensive with the same standard features for all parts of the organisation; • Responsive and learning, to prevent repetition of the cause of similar complaints and to take improvements forward from feedback received. 	
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>Section 13.4 of the Group Complaints Policy states:</p> <p>As well as regular performance updates to the Customer Voice, a summary of the annual complaints performance and service improvement report is also included in the Autumn Customer Newsletter and as part of our Annual Report to customers and external stakeholders.</p>	<p>Monthly KPI reporting to Executive Team, Heads of Service Group and Senior Leadership Team.</p> <p>Quarterly and annual reporting to the Customer Experience Committee</p> <p>Annual reporting to Board</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, serious risks, or policies and procedures that require revision.	Yes	The Complaints Team includes the Head of Governance, Risk & Assurance who is the lead person accountable for complaint handling and oversees themes, trends, systemic issues and risk.	



			The Assistant Company Secretary (Complaints Officer) directly reports to the Head of Governance, Risk & Assurance.	
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	Section 13.6 of the Group Complaints Policy states: The Chair of the Customer Experience Committee will take lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the Customer Experience Committee and Board receives regular information on complaints that provides insight to the Customer Experience Committee and Board on complaint handling performance.	Assurance on the effectiveness of the Policy is achieved by the Board and Customer Experience Committee receiving regular updates
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	See Evidence under 9.5.	The Chair of the Customer Experience Committee is a Non-Executive Director and has access to all colleagues within Coastline, to include Executive Directors and Heads of Service.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <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; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and 	Yes	Quarterly and Annual Complaints Performance Reports are submitted to the Group Customer Experience Committee, and annually to the Board. From 2024 this will include the Ombudsman Self-Assessment in line with expectations of the updated Code. In any event the Ombudsman Self-Assessment has previously been and will continue in future to be	Quarterly and Annual Performance Reports include analysis of data for all complaints received, trends, timeframes and extensions, percentage upheld, improvements and commitments identified and financial redress awarded. These reports also include data on service failures.

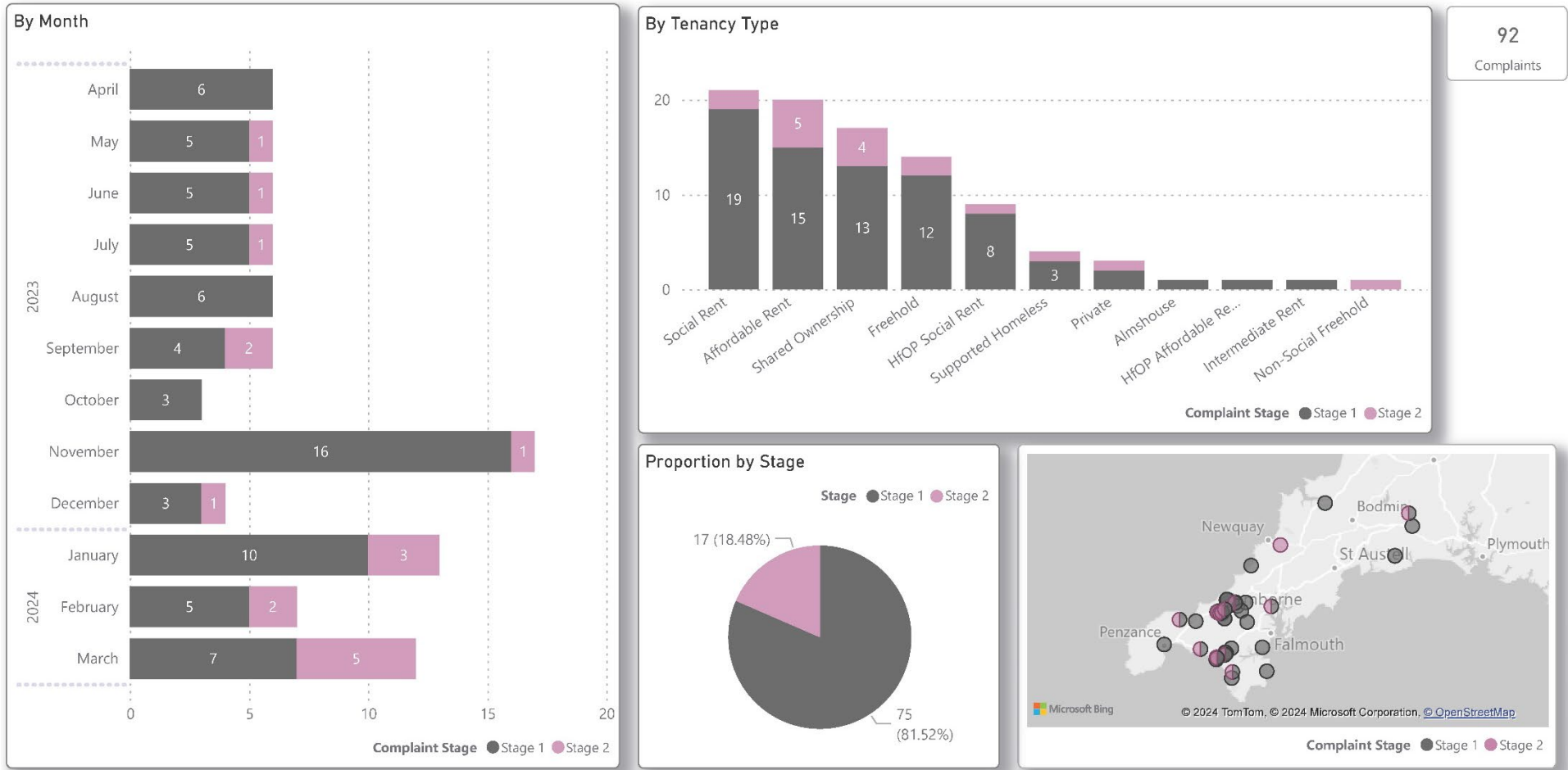


	d. annual complaints performance and service improvement report.		reviewed annually by the Group Audit, Risk & Assurance Committee as part of the Annual Compliance Report.	An analysis of complaints referred to the Ombudsman are included with findings where these have been received. Ombudsman Spotlight and Insight Reports are also reported with action plans.
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> <ul style="list-style-type: none"> 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	<p>Section 2.2 of the Group Complaints Policy states that the Policy is a key element of our overall approach to customer care and Coastline’s values for putting our customers first and being open, honest and accountable. As part of ‘striving to be the best’ it is important that we identify issues and work as a team to both rectify the initial cause of a complaint as well as learning from the mistake so as to avoid repeating it.</p> <p>Section 1.1 of our Group Complaints Procedures state: All colleagues are empowered, trained and equipped with the right tools and skills needed to deal positively with any issues raised by our customers and, wherever possible, to put things right straight away (‘business as usual’) at the first point of contact.</p>	<p>Our published Coastline Purpose & Values, Trust Charter, Coastline Customer Pledges and Group Code of Conduct all support a culture that when things go wrong we will make it easy for customers to raise concerns and complaints and will try to put things right straight away and learn from the issues raised to ensure we continually improve our services.</p> <p>All colleagues receive detailed training on the Complaints Policy and Procedures with an emphasis on empowering staff to be able to identify and wherever possible, resolve issues at the first point of contact.</p>

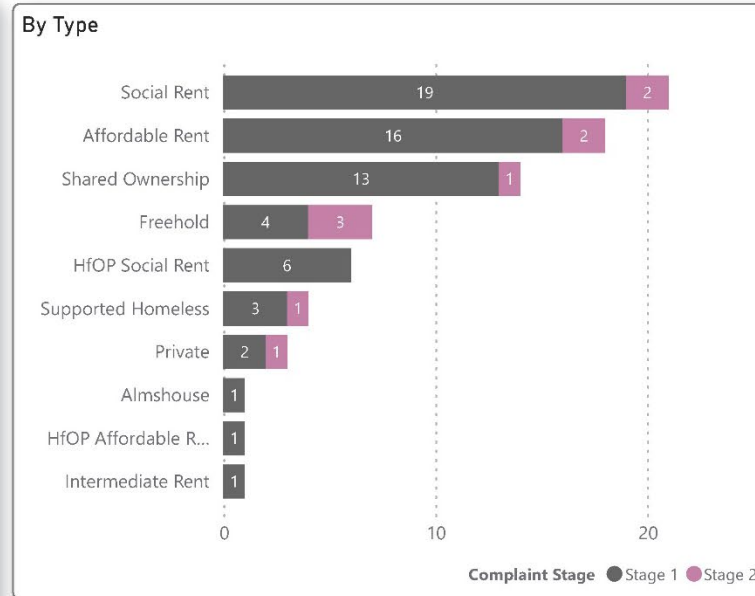
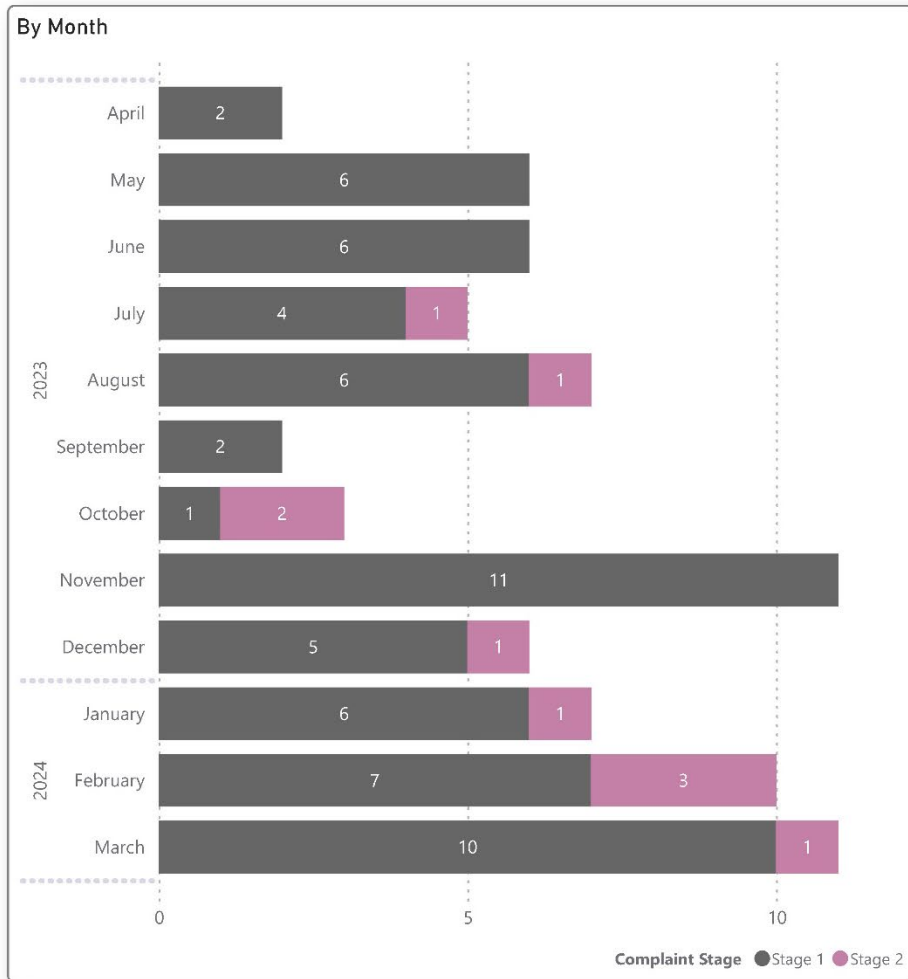


Complaints Analysis by Stage and Tenancy Type

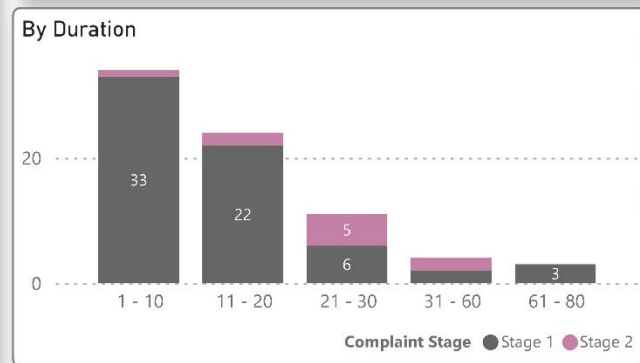
Complaints – Stage 1, Stage 2



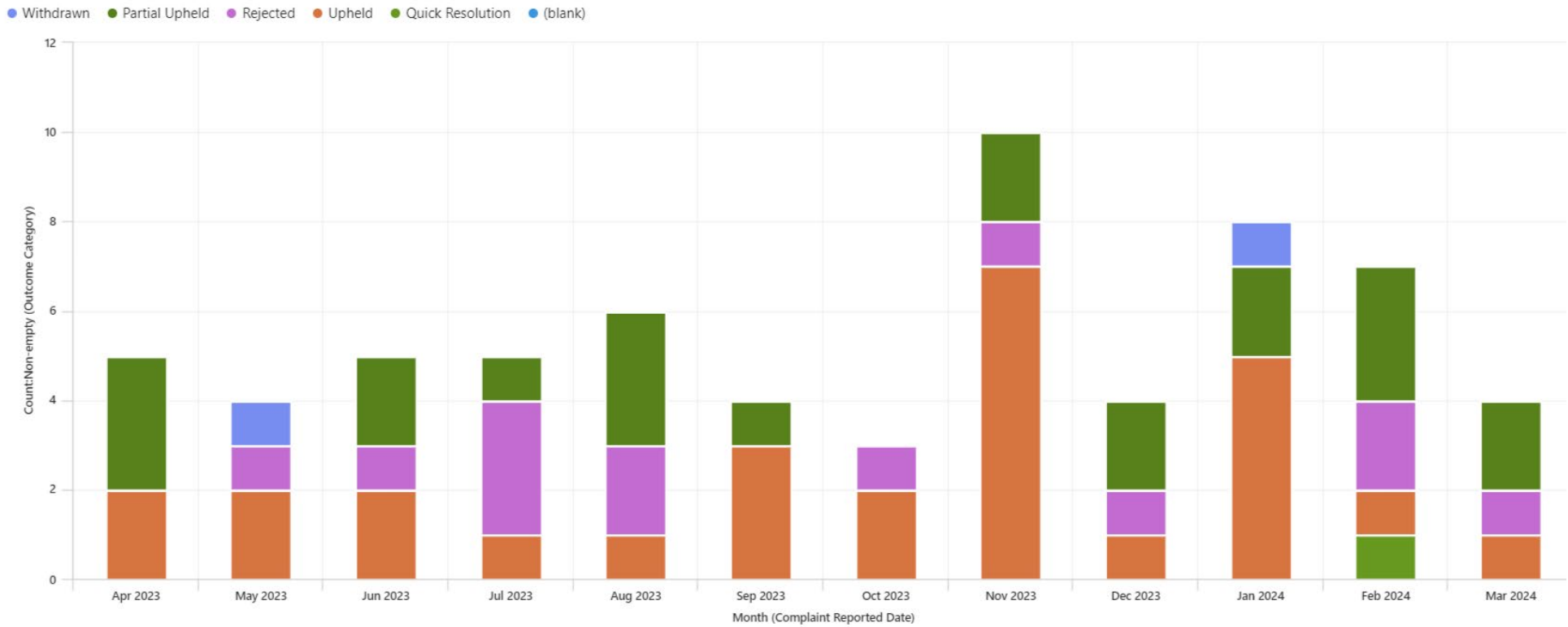
Complaints for all stages



76
Number Closed



Complaint Outcomes at Stage 1 and Stage 2



Complaint Investigation Timeframe Performance

The Housing Ombudsman Service Complaint Handling Code (and our Policy) states investigation timeframes should be no longer than ten working days at Stage 1 and 20 working days at Stage 2, unless the case is of a complex nature and re is it without

Figure 1 - All complaints closed during 2023/24

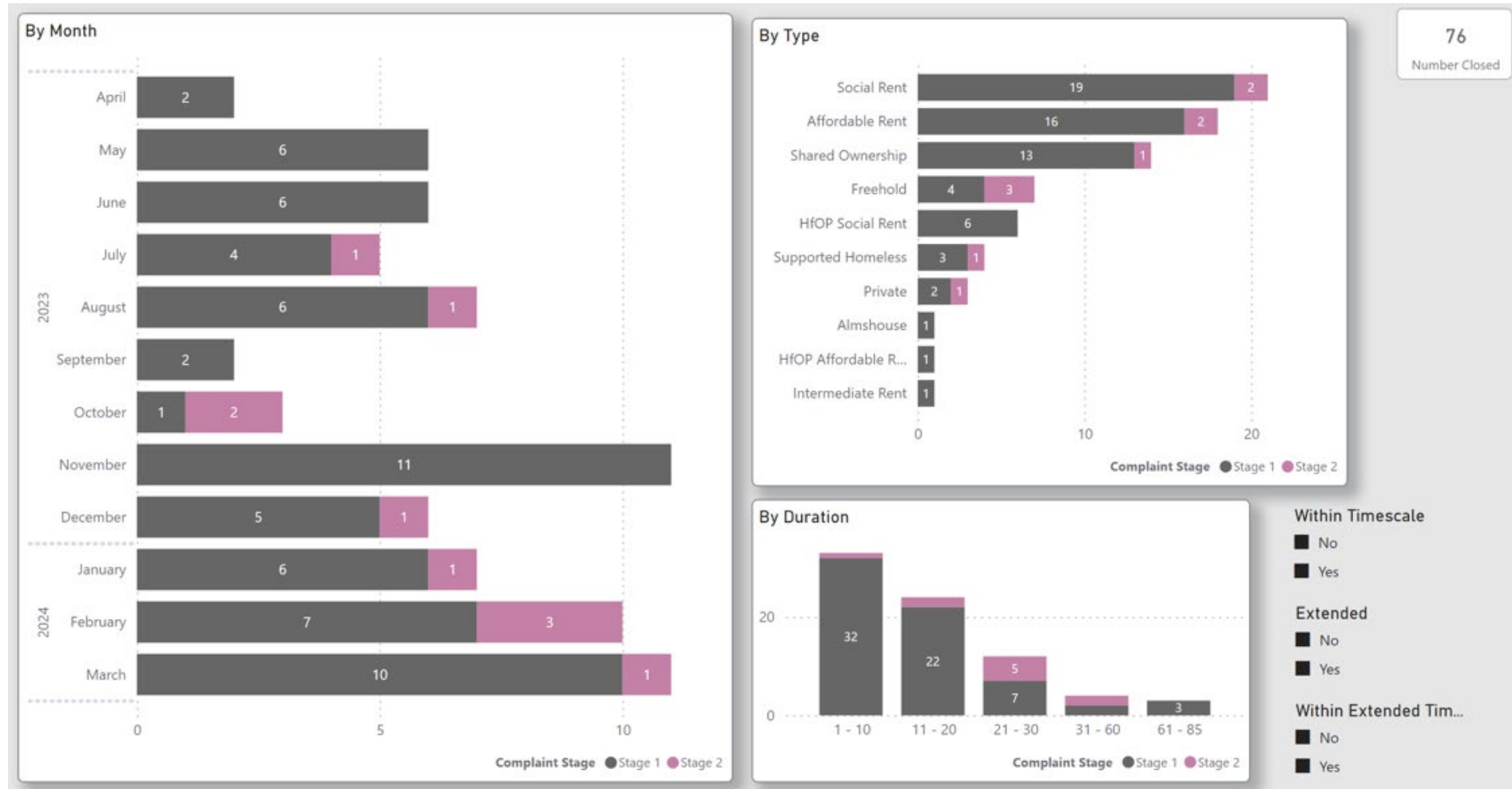


Figure 2 – Complaints closed within Policy timeframes, without the need for an extension being agreed with the customer

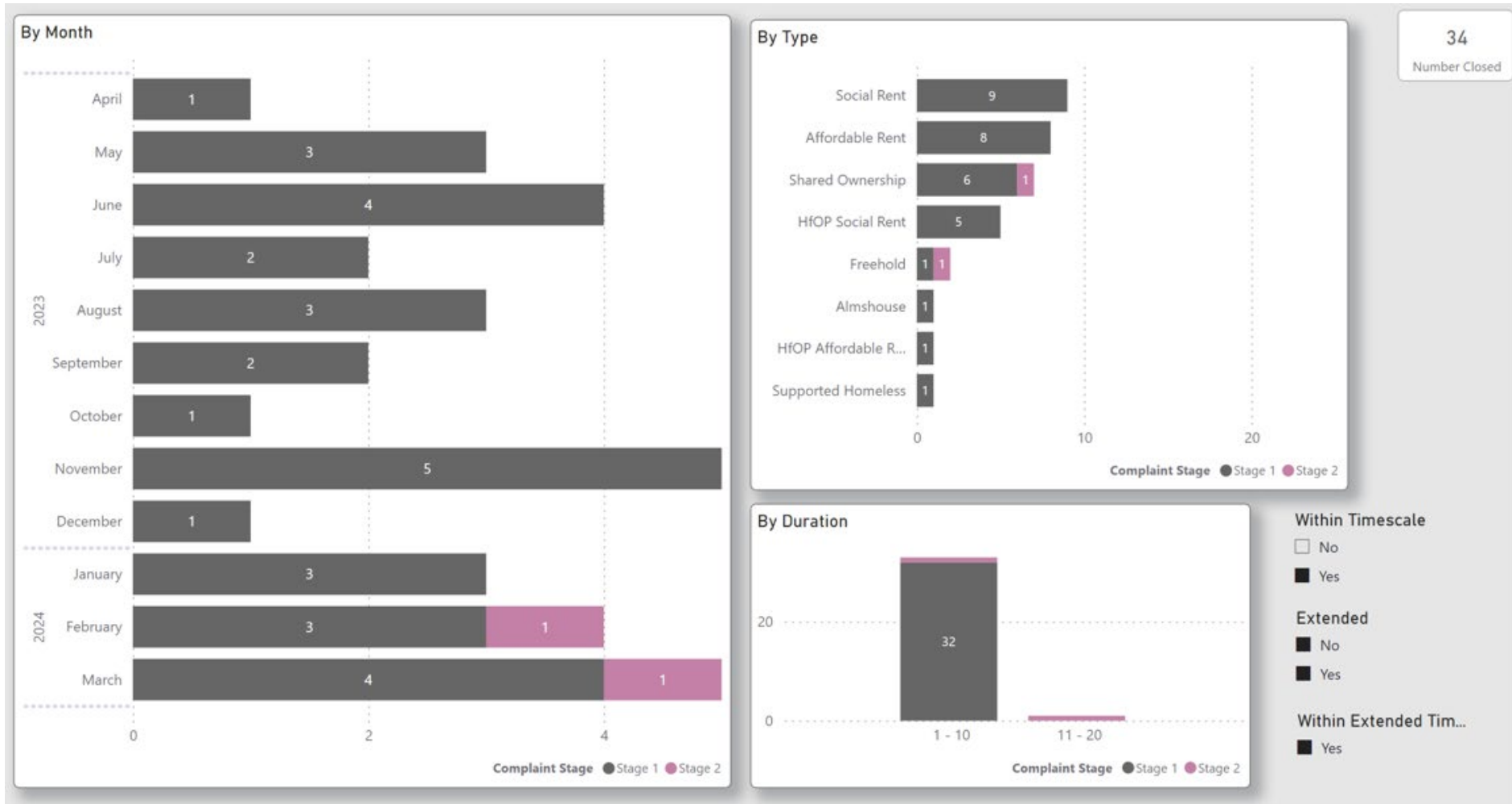


Figure 3 – Complaints closed within Policy timeframes, as closed within an extension period agreed with the customer

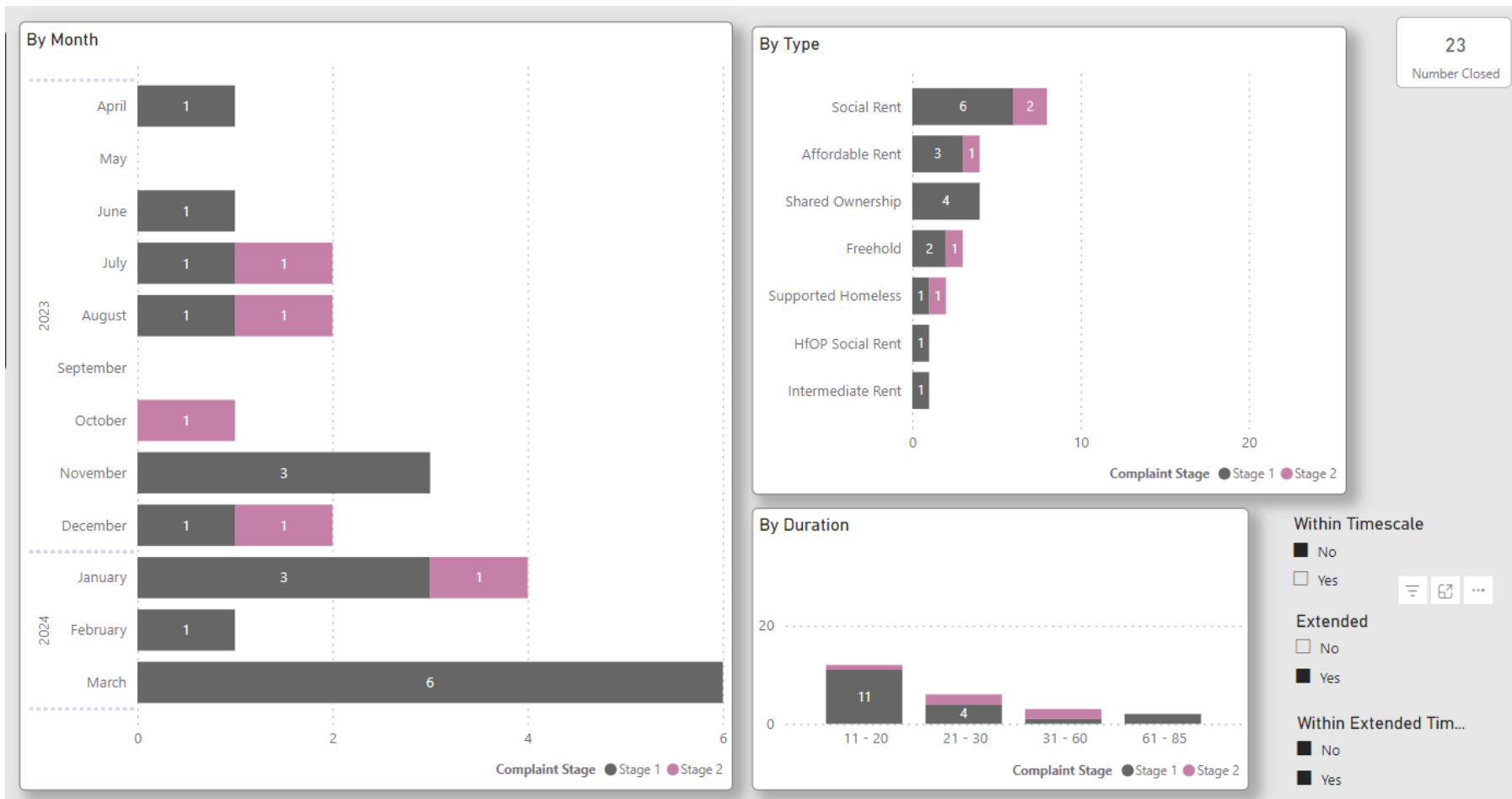


Figure 4 – Complaints closed outside Policy timeframes, as closed outside an extension period agreed with the customer

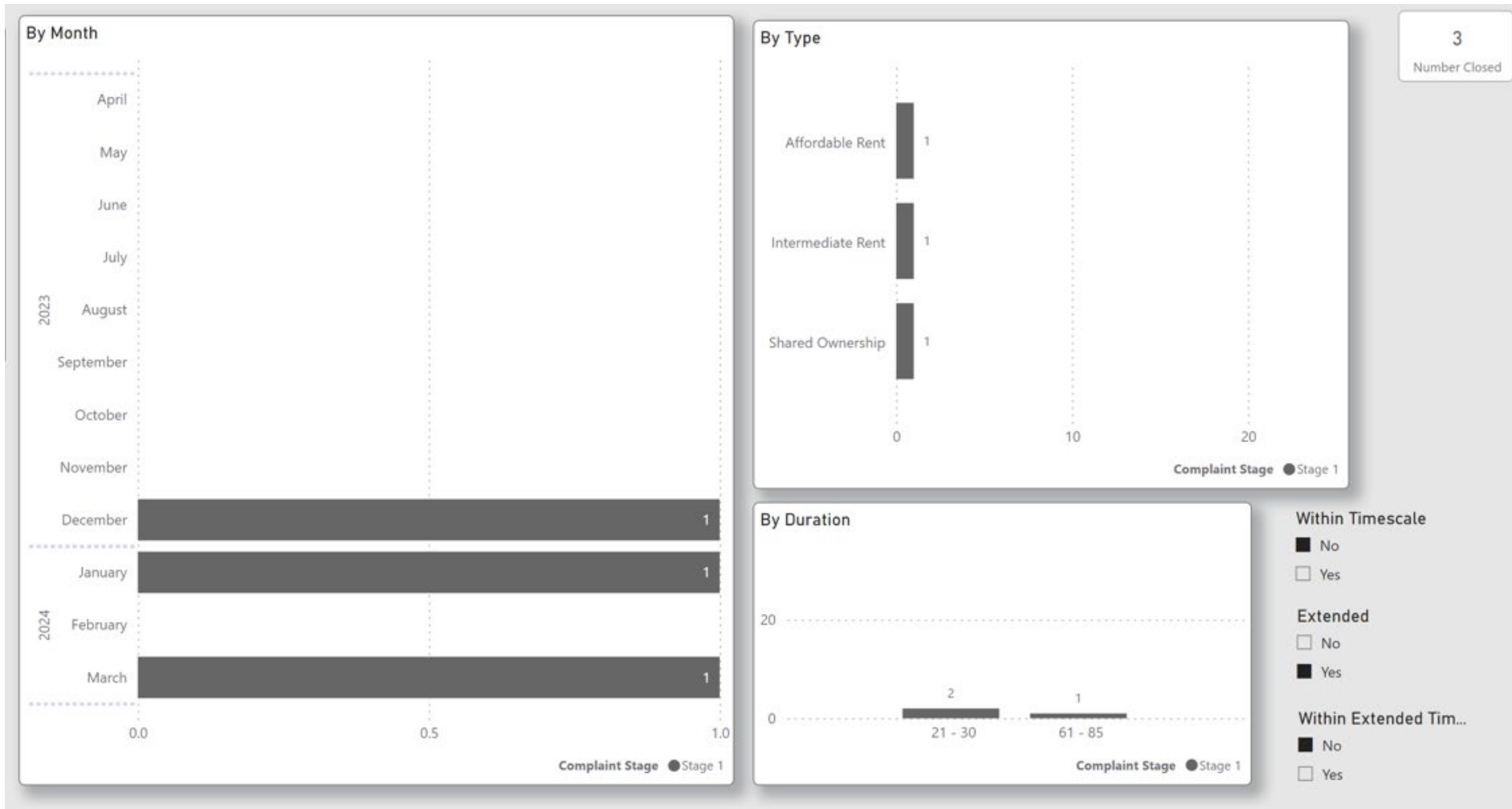
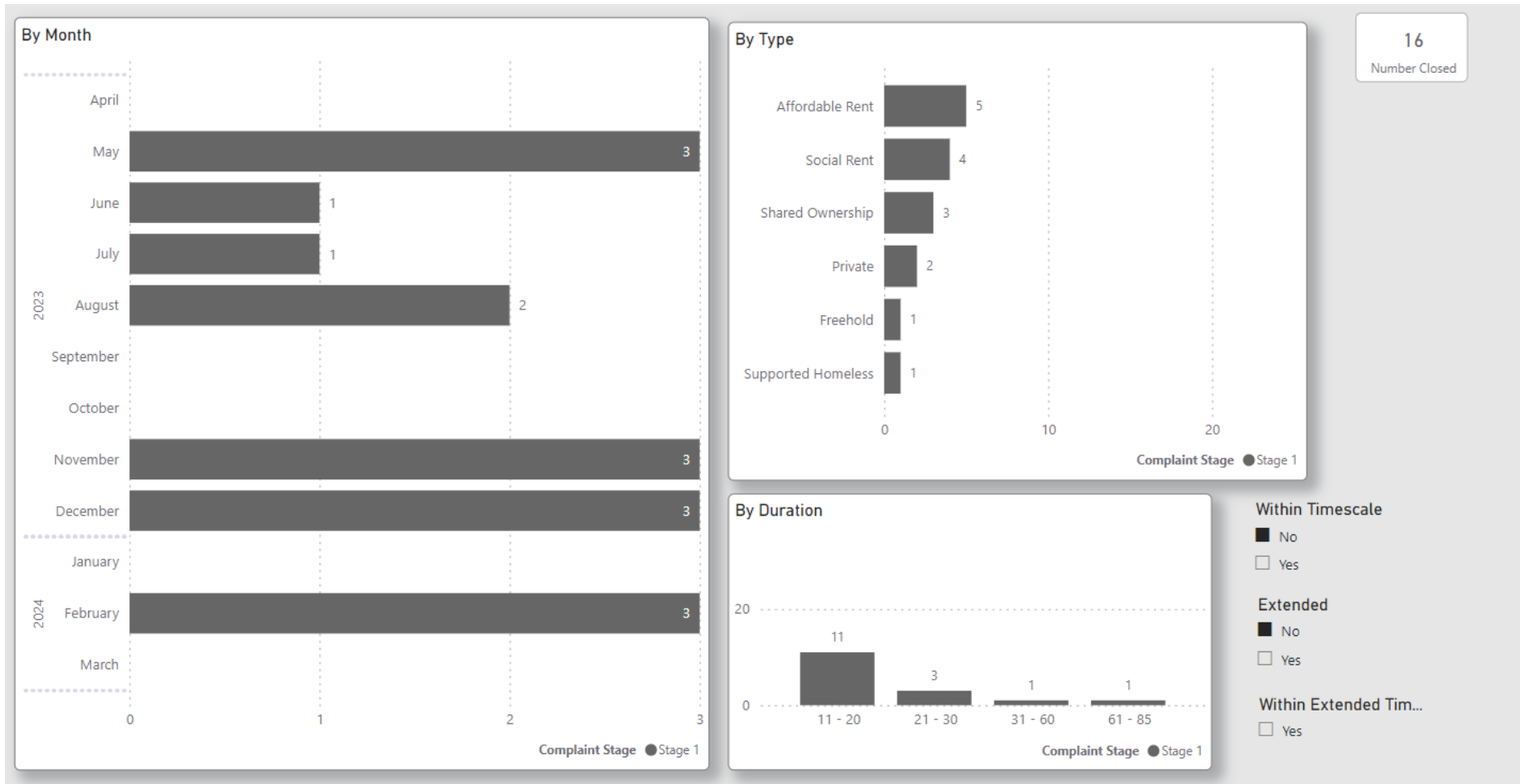


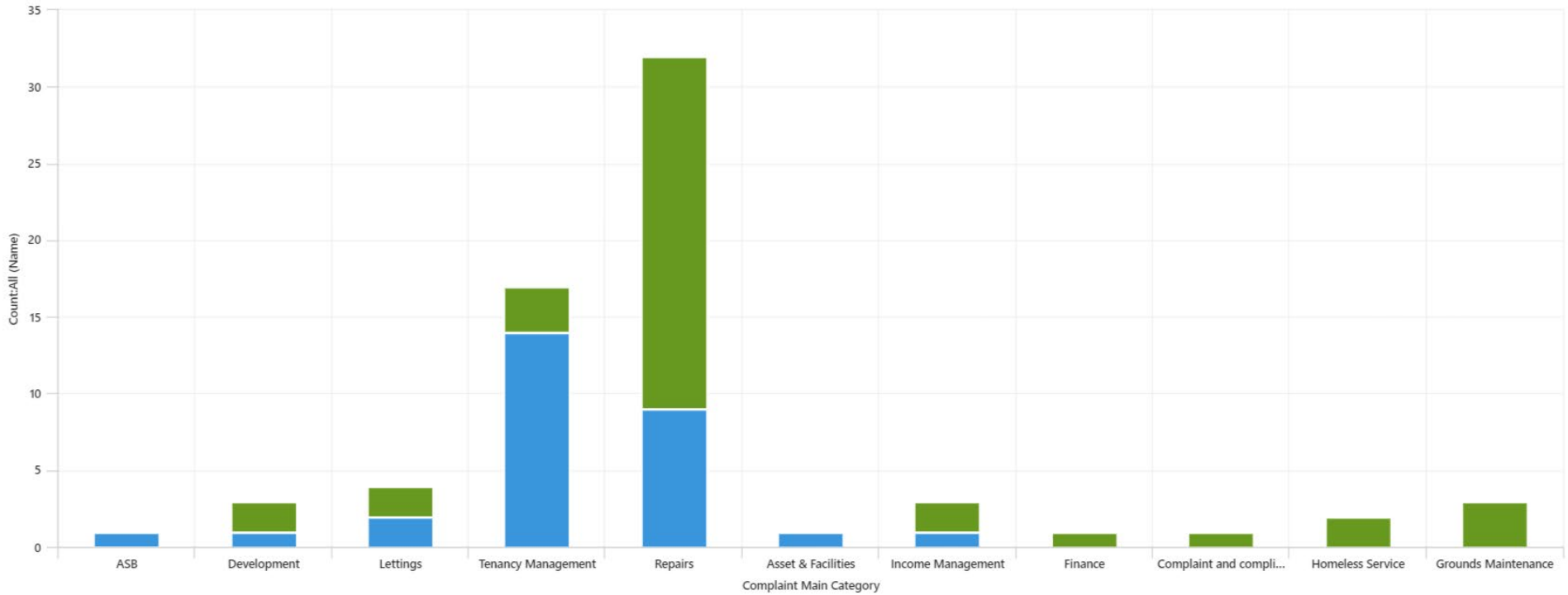
Figure 5 - Complaints closed outside Policy timeframes, without any extension period agreed with the customer



Improvements and Commitments Identified by Service Area

Service Area Complaint Action (12 Months) ▾

● Service Improvement ● Commitment



Disrepair claims

Number	Case status	Date received	Detail of disrepair	Complaint progress instigated?	Notes for annual complaints report
1	Live	29.07.22	Repairs	No	Awaiting court details. Currently no further contact received from claimants solicitor
2	Live	01.03.23	Structural damage to outside of property front door and bedroom window jams vibration through ceiling Cracks and sound in ceiling Walls buckling under weight in living room Boiler capped Bedroom 1- structural damage and mould Bedroom 2- ceiling and walls has mild mould Mould in bathroom Leak under kitchen sink Unfit for human habitation	Yes – Stage 2	Part 36 offer from customers solicitor. This has been rejected. Awaiting further contact
3	Live	04.04.23	Defective brickwork. Bedroom one and two – mould growth, damp, and damaged decoration. Hallway – mould growth, damp, and damaged decoration. Living room – mould growth, damp, and damaged decoration. Bathroom – excessive mould growth, damp, damaged decoration, and a defective extractor fan. Kitchen – mould growth, damp, damaged decoration, and a defective extractor fan. Defective front and back external door. Defective windows to the living room, bedroom one, and bedroom two. Defective radiators throughout the property. Defective drains within the kitchen	Yes – Stage 1	Awaiting injunction for access. Customer has refused access to carry out the works on 2 occasions. Once before and once during the disrepair case. Awaiting court details. Currently no further contact received from claimants solicitor and awaiting confirmation of injunction. Letter sent to customers solicitor refuting claim. Report from customers surveyor noted a number of incorrect details including wrong property construction.



4	Live	18.04.23	Hallway- carpets ruined due to floods, stair has come away from staircase, steps unsafe, Living room- floor covered in water, walls covered in damp and mould, personal property damage Kitchen- floor covered in water, wall and ceiling covered in black mould Bathroom- floor covered in water, walls and ceilings covered in back mould, black mould behind toilet and window frame Bedroom 1- floor is covered in water, walls covered in black mould	No	Injunction in place and customer in breach of this by still refusing access. Going back to court and awaiting dates.
5	Live	27.06.23	Issue with pointing at side of property Damp in living room and bedroom Leak and water ingress in bathroom water damage in bedroom	Yes – Stage 1	Currently no further contact received from claimants solicitor.
6	Live	20.07.23	Leak in roof	Yes – Stage 1	Ongoing although customer has moved out. Currently no further contact received from claimants.
7	Live	26.09.23	Damp and mould	No	Survey carries out by Coastline on 26.10.23. Surveys carried out by claimants solicitor and also by Coastline independent surveys. This was received on the 09.01.24. Part 36 offer received and rejected. This one is going to court. Update once court date is received.
8	Live	29.09.23	Damp and mould in Bedrooms 2/3, hallway, kitchen and bathroom Back door defective Damage to hallway carpet Loft walls and insulation defective	No	Survey carried out by Coastline on 20.10.23. Survey undertaken by claimants solicitors and Part 36 offer received which was rejected. Finally managed to get access for our disrepair surveyor due to no access by customer. Awaiting copy of the report from the 04.04.24.

