



# Annual Complaints Performance and Service Improvement report

April 2024 – March 2025



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# Introduction

At Orbit, we're committed to delivering a service that's fair, responsive and built around what matters to you. This year's Complaints performance and Housing Ombudsman findings show that the changes we've made are starting to make a positive difference. We know we don't always get things right, but we're learning from where we fall short. We know that when things go wrong, it's how we respond that counts. While there's still a lot more to do, we're making progress, and we're fully committed to continuing that journey with purpose and with our customers at the heart of it.

We've seen some encouraging signs - no complaint handling failures, a decrease in our maladministration rate, and more cases where we've acted early to resolve issues without the need for escalation. Satisfaction with how we handle complaints has begun to improve. However, this report rightly highlights areas where we haven't consistently met expectations, particularly in terms of delays in processing a case, our communication throughout a case, and following through on promised actions.

That's why we've launched the Everyday Excellence programme - our plan to improve the way we work, the systems we use, and how we support our colleagues to deliver a better service every time, as part of our wider 2030 Strategy Plan. We're investing in smarter technology that helps us resolve complaints faster, redesigning customer journeys to make it easier to get the help you need and giving our teams the tools and training they need to make sure we get things right, first time.

You'll see this reflected in some of the changes already under way - from a stronger focus on complaint follow-up, to clearer communication and improvements to key services like repairs, lettings, and how we handle anti-social behaviour. Just as importantly, we're tackling the root causes behind these complaints to prevent issues from happening in the first place. We've also aligned our Complaints and Ombudsman teams into one dedicated Customer Resolutions service to ensure a more joined-up approach.

**Joe Brownless**  
Chief Customer Officer



# The Customer Experience & Service Delivery Committee fully supports this report and its findings

We know that when customers raise a complaint, it's because something hasn't gone as it should — and it's our responsibility to make sure those experiences lead to a positive and sustainable change, that makes a difference to you.

This report shows where Orbit is making progress and where further improvement is still needed. As a Committee, we're committed to making sure that all feedback from customers is taken seriously, acted upon, and used to shape better, more consistent services. I'm pleased to see that Orbit has taken on board the Ombudsman's recommendations to make the complaints process clearer and more accessible for customers.

We will continue to work closely with the Orbit team to make sure that learning from complaints is always part of how Orbit improves — every day, and for every customer.

**Helen Gillet**

Chair of the Customer Experience & Service Delivery Committee and Member Responsible for Complaints





## Executive Summary

In 2024/25, we continued to learn from customer feedback and complaints to improve the way we deliver services. We received 3,441 Stage 1 complaints. Although the number of customer complaints initially rose earlier in the year - following internal changes to improve how we handle them - volumes have since stabilised as we've strengthened our approach to managing service requests and supporting customers earlier in their journey.

Resolution times are improving and we're continuing to embed learning from Complaints across all areas of the business. This includes clearer communication, stronger follow-through, and a greater focus on resolving issues first time.

We've seen progress in key areas - including an uplift in satisfaction with the way in which we handle complaints (as measured through direct customer feedback), a reduction in severe maladministration findings from the Housing Ombudsman, and more examples of us acting early to put things right. But the data also shows we still have work to do, especially in

strengthening Stage 1 resolution to prevent unnecessary escalation.

As we move into 2025/26, we remain focused on turning feedback into meaningful action, continuing to learn from every complaint, and improving outcomes for all our customers.

We're listening, learning and acting - and while we know there's more to do, we're committed to making lasting improvements. Our aim is simple: to give you a service that's easier to use, more consistent, and more reliable every time you interact with us. These changes support our 2030 ambition - to provide one

## Housing Ombudsman Review

Following our submission on 21 June 2024, the Housing Ombudsman reviewed Orbit's complaints policy to assess alignment with the Complaint Handling Code. Their feedback was largely advisory, with ten recommendations aimed at improving clarity for residents and ensuring the policy is easier to navigate and understand.

We've welcomed this opportunity to strengthen how we communicate our complaints process and have already taken steps to amend the policy in line with the advice received. These updates form part of our wider commitment to making it as straightforward as possible for customers to raise concerns and access fair outcomes.



of the best customer experiences of any housing association in the country.

As a result, we've seen steady improvement in the latter quarters, with the final quarter showing a

# Complaints Handling Performance 2024-25






From April 2024 to March 2025, we received 3,441 formal complaints at the first stage of our complaints process. This followed internal changes made in March 2024 in line with regulatory requirements.

As a result, volumes initially increased as we began capturing and recording more customer concerns in accordance with the updated approach. Since then, volumes have stabilised and begun to reduce as we improve how we handle service requests, ensuring that customers are supported earlier and more efficiently without the need to enter the formal complaints process unnecessarily. This reflects the positive impact of improved processes, clearer routing, and a greater focus on early resolution.

Over the year, we responded to 61.6% of Stage 1 complaints within timescale – an improvement from 40.6% in 2023/24. While this is still below the standard we aim for, it has been a key area of focus throughout the year.

significant uplift in performance.

Stage 2 complaints increased this year, with 927 complaints escalating compared to 495 in 2023/24. While this rise reflects greater customer confidence in using the complaints process, it also highlights where we need to strengthen our first-stage resolution. Reducing the need for escalation will be a key focus for the coming year. With the continued support of our Aftercare Team, whose purpose is to ensure we followthrough on the actions we've promised, helping to rebuild trust and reduce the number of customers who feel they need to progress their complaint further.

|                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <div>Total service requests received</div> <div>64,567</div> | <div><div>Stage 1 complaints received</div><div>3,441</div></div> <div><div>Stage 1 complaints handled in line with ombudsman code</div><div>61.6%</div></div> | <div><div>Stage 2 complaints received</div><div>927</div></div> <div><div>Stage 2 complaints handled in line with ombudsman code</div><div>43.4%</div></div> |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Refusals

In line with the Housing Ombudsman's Complaint Handling Code, our Complaints and Customer Care Policy outlines the circumstances where we may decide not to classify a matter as a complaint - although we will still review the issue and respond appropriately.

This includes cases such as first reports of antisocial behaviour (ASB), disputes about rent or service charges, or matters where there has already been a formal determination.

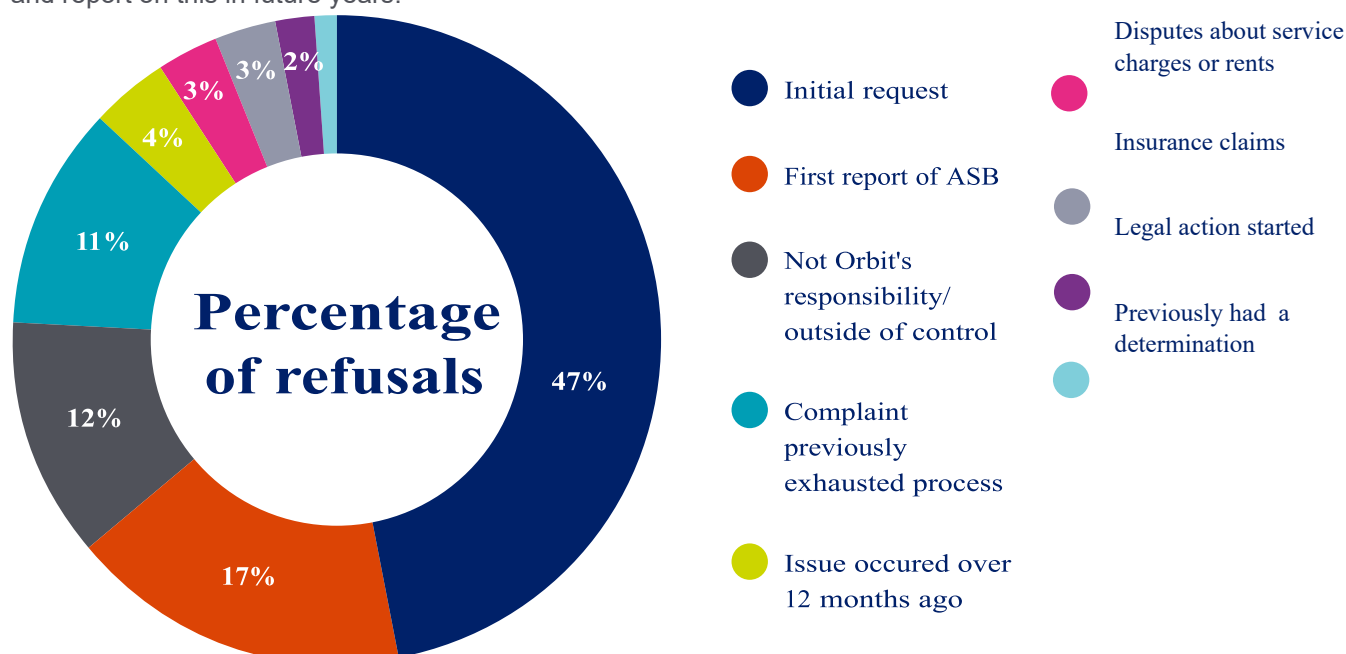
In 2024/25, we recorded 413 complaints that were excluded under this policy.

This marks the first year we have formally recorded and reported on refusal data, following improvements to our systems and processes. We are committed

to maintaining transparency around this aspect of complaints handling and will continue to monitor and report on this in future years.

It's important to note that earlier in the year, some complaints were incorrectly routed into the formal process due to changes in how complaints were handled following the removal of our triage function. This contributed to a higher number of exclusions, as some issues did not meet the criteria of a formal complaint. Since then, we have strengthened our approach through a clearer service request process, ensuring that customers receive the right support from the outset without being unnecessarily routed into the

complaints system.

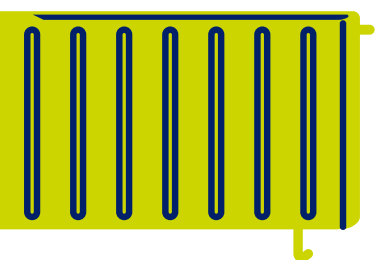
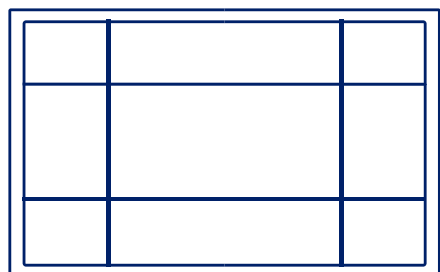


## Complaint Outcomes

In 2024/25, 63% of Stage 1 complaints were upheld and 17% were partially upheld. At Stage 2, 54% were upheld and 25% were partially upheld, which suggests that in some cases, we could have resolved things better and sooner at the first stage.

We're using this insight to make real improvements to how we manage complaints - with a focus on clearer communication, stronger follow-through, and early resolution.

Improving the quality of our Stage 1 responses remains a priority. With the introduction of our Aftercare Team, we are focused on resolving complaints first time and ensuring promised actions are followed through. This approach aims to reduce escalation and build greater trust in our complaints process.

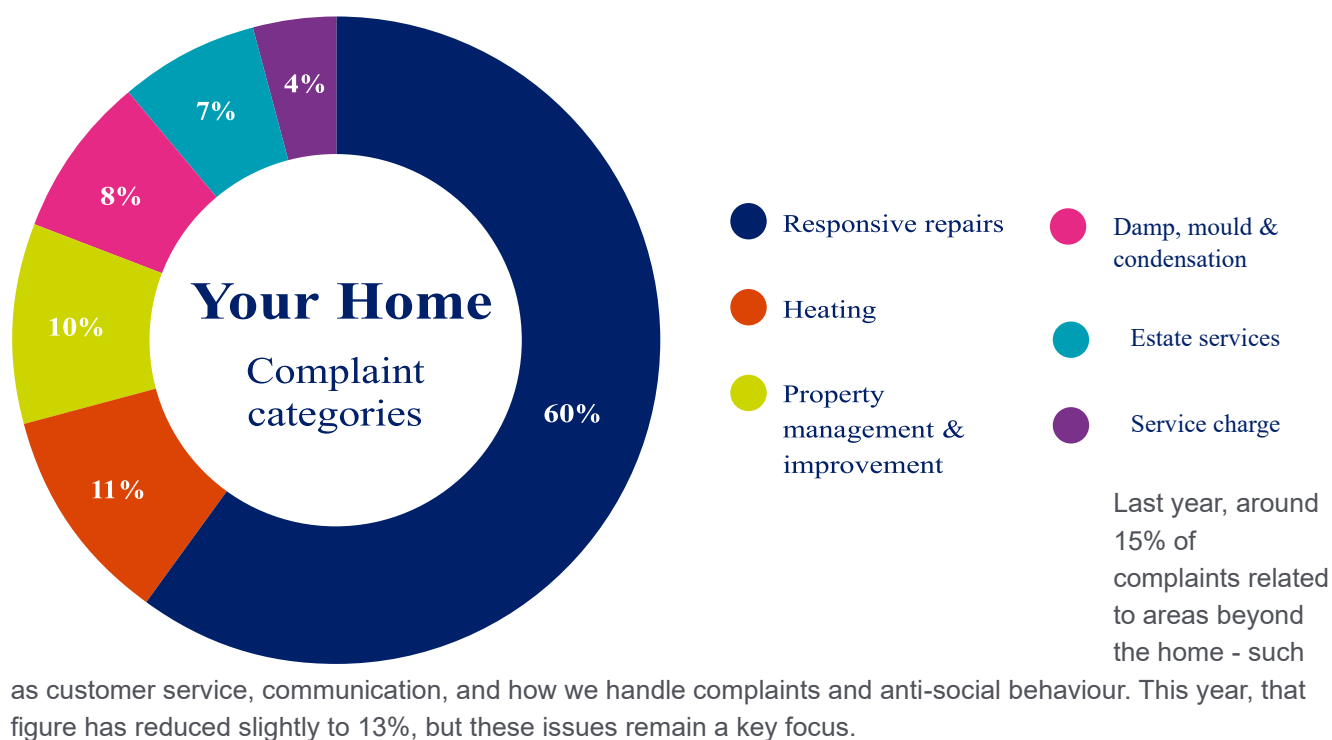




## Reasons for customers raising complaints

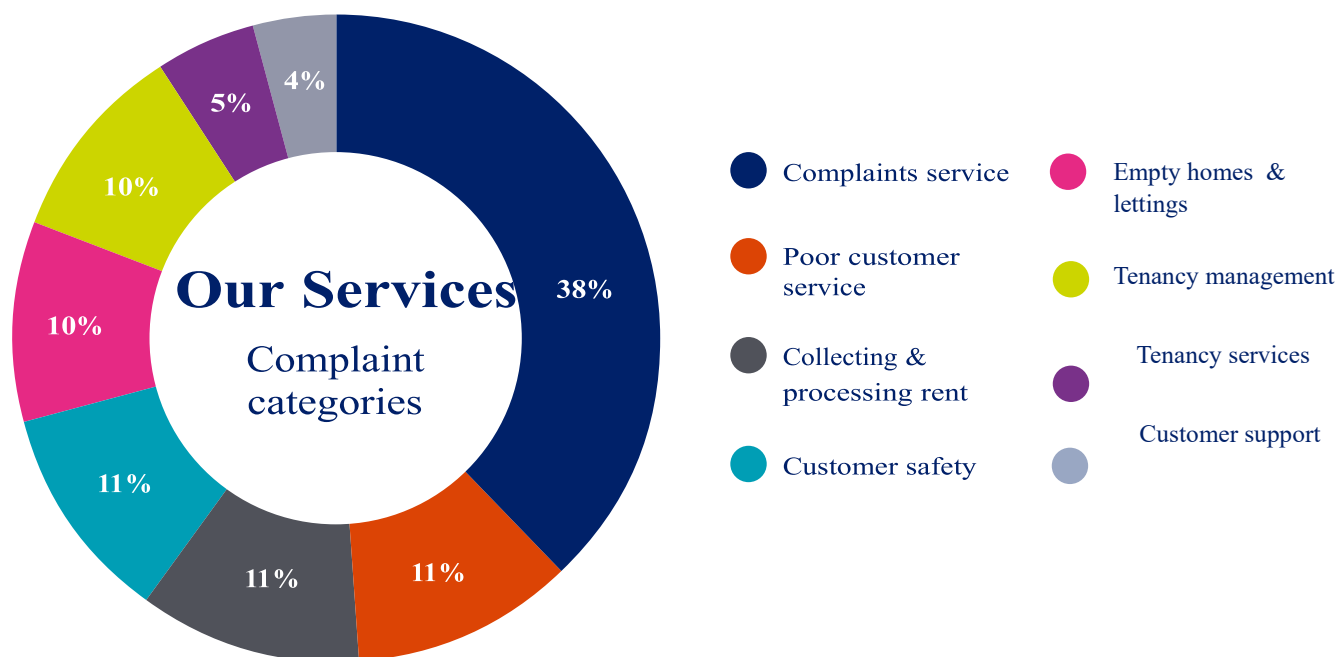
In 2024/25, the majority of complaints related to how we manage customers' homes, with Responsive Repairs accounting for almost half of all Stage 1 complaints.

Home Ownership, Damp and Mould, and Heating and Gas Servicing were also among the most common issues raised. These trends are helping us focus our efforts where they are most needed. We are continuing to work closely with operational colleagues to track recurring issues, improve communication, and take action to prevent the same problems happening again.



These complaints often reflect how services are delivered - including delays in communication, unclear processes, or how tenancy support is managed. That's why we've made changes to improve how customers contact us, how we keep them informed, and how we follow through on our commitments.

We'll continue to focus on these areas as we shape services around what matters most to our customers.



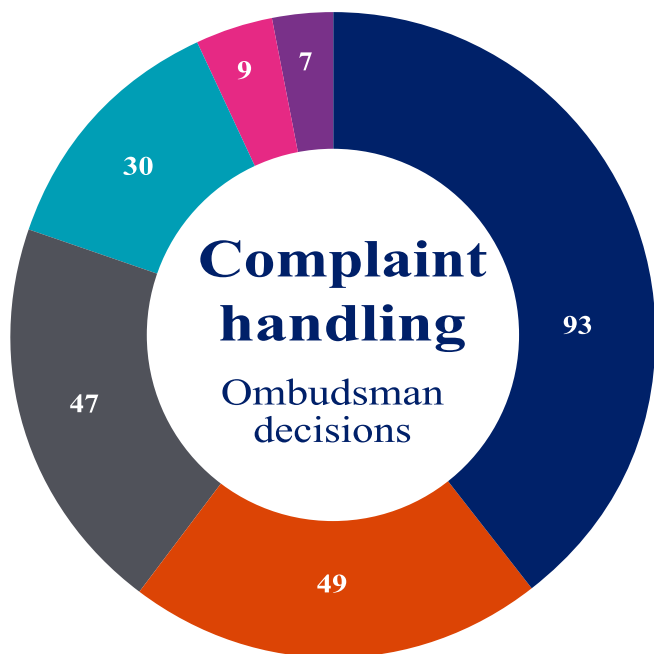
## Housing Ombudsman's annual report about our performance

Between April 2024 and March 2025, the Housing Ombudsman made decisions on 100 complaints about Orbit, with a total of 235 findings. While this was more than in previous years, many of the complaints were historic and linked to issues we've already started to put right. As a result of these findings, the Ombudsman ordered compensation payments totaling £100,671, compared to £13,327 the previous year.

We're pleased to report that no Complaint Handling Failure Orders were issued to us this year. This reflects the progress we've made since last year - particularly in how we respond to complaints, follow up on promised actions, and make sure customers feel heard and supported.

There are also encouraging signs of improvement in the outcomes. Compared to the previous year:

- Severe maladministration findings were down by 10%



The Housing Ombudsman's decisions continue to highlight important areas where we need to do better — including repairs, damp and mould, antisocial behaviour, communication, and how we handle complex or vulnerable cases.

We've used this feedback to make real changes, such as clearer communication with customers, better record-keeping, improved complaint management, and stronger follow-through when we say we'll do something.



We know there's still work to do, but we're learning from every complaint and staying focused on building services that are fair, consistent, and centered around what our customers need.

## Learning and Service Improvements from Complaints

We believe everyone deserves to feel safe, supported, and proud of where they live and when things go wrong, it's our job to listen,

- Findings where we had already taken steps to put things right (reasonable redress) were up by 13%
- The number of complaints with no maladministration - where we handled things correctly - also increased by 3%. Our Maladministration rate dropped to 63% compared to 76% in 2023-24.

These changes show the progress we're making in getting things right more often and stepping in to resolve issues before they escalate. However, we remain deeply uncomfortable with the rate of maladministration findings, and reducing this continues to be a priority for the whole organization.

Maladministration No maladministration

Service failure Severe maladministration

Reasonable redress Outside jurisdiction

put it right, and learn from it.

In 2024/25, complaints have once again proven to be a vital source of learning. They've helped us understand not just where we've fallen short, but where our services haven't felt fair, flexible or

responsive enough to meet the needs of our customers. Through this feedback, we've identified

## Complaint Handling

clear themes - from delays and communication breakdowns to the need for more joined-up working between teams. These insights have been essential in helping us focus our efforts on what matters most to our customers.

We've used these learnings to make real improvements across the organisation - strengthening how we handle complaints, improving our repairs service, making the lettings experience more consistent and providing better support in complex and sensitive situations.

We know we won't always get things right first time and we know there's still more to do. But by listening, learning and acting on what our customers tell us, we're building stronger foundations for long-term change. Complaints give us valuable insight into where services fall short, where processes need to be more flexible, and where communication needs to improve.

We'll continue to use complaints to challenge ourselves, to make evidence-based decisions, and to design services that work better for everyone. Whether it's through improving how we respond, fixing root causes, or identifying wider learning across

teams, complaints will remain a key part of how we grow, build trust, and deliver on our values: caring,

## Responsive Repairs

inclusive, accountable, and focused on getting it right - first time, and every time.

We made some important changes in March 2024 to improve how we manage complaints. This led to a rise in formal complaints, which showed us we needed to make it easier for customers to get the right support, at the right time.

Since then, we've worked hard to improve the way we respond. Our website and customer portal now guide people more clearly, and we've introduced a dedicated team to resolve service enquiries early - before they escalate into formal complaints. This has helped bring the number of complaints back to a more manageable level and improved the experience for customers.

We've also worked closely with our Complaints Scrutiny and Co-Creation Group to strengthen how we respond when things do go wrong. Together, we developed a new quality checking process to improve the tone, clarity and fairness of our complaint responses - making sure they reflect our values and speak to customers in the right way.

In addition, we've started introducing an Aftercare Team to follow up on complaint outcomes and ensure



agreed actions are completed. While this is still in its early stages, it's already helping us keep customers better informed and reducing repeat complaints. These changes are making a real difference. Satisfaction with how we handle complaints (measured through realtime customer feedback) has increased from by over 20% to 57.9%, and while we know there's still more to do, we're committed to building a service that listens, learns, and puts things right - strengthening trust and improving outcomes for our customers.

We know that when something goes wrong in your home, you want it fixed quickly and with minimal hassle. Complaints and feedback over the past year have shown us that our repairs service hasn't always met those expectations. Customers told us they were frustrated with delays, repeat visits, and a lack of clear communication - especially when dealing with complex or ongoing issues.

To put things right, we listened to customers, colleagues, and contractors to build a clearer, more joined-up service. As a result, we've:

- Introduced better systems to track repairs and keep customers updated

- Made sure our contractors have the right information first time, reducing the need for repeat visits
- Put specialists in place to support more complex cases
- Transferred disrepair claims to a dedicated team for clearer accountability
- Improved how we manage appointments, so customers know what to expect
- Strengthened collaboration between teams, making it easier to get things sorted without delays

We've also started reviewing our long-term repairs contracts, to make sure our partners are delivering the right standards - and that customers feel the benefit.

While this is still work in progress, these changes are starting to make a real difference. We're already starting to see a reduction in the number of complaints about responsive repairs, which shows that the service is moving in the right direction.

There's still more to do, but we're committed to building a repairs service that reflects our purpose - one that is fair, consistent, and makes it easier for customers to feel safe, supported, and proud of their home.

## Lettings

## Sustainability





We believe that moving into a new home should feel smooth, positive and reassuring - but some customers told us this wasn't always the case, particularly when last-minute changes were involved. This sometimes led to errors in tenancy agreements, notices, or the information we shared with other organisations like the Department of Work and Pensions.

To put this right, we've introduced extra checks to make sure everything is accurate before a tenancy goes live. This includes a new review process, quality control steps, and better ways of checking information across systems. We're also working on making mutual exchange paperwork simpler and clearer, and we've supported our teams with additional training to get it right first time.

These changes mean new customers are more likely to receive the right information from the start - helping to build trust, reduce stress, making moving into an Orbit home feel as it should: safe, supported, and something to be proud of.

## Management Moves

Through complaints and feedback from the Housing Ombudsman, we learned that our Management Move process didn't always fully consider the needs of customers experiencing domestic abuse. In some cases, the process felt too rigid, and didn't give enough space to account for individual situations.

We've made changes to ensure these moves are handled with greater care, empathy and flexibility. A dedicated panel now reviews cases and has the discretion to remove blockers where it's safe and appropriate to do so. Teams are also improving how they record and track customer interactions in real time, helping us respond more quickly and consistently.

While these changes are still being rolled out, they're already helping us provide more personalised and supportive responses to customers facing difficult and often urgent circumstances.

Customer feedback and complaints have played an important role in shaping our approach to sustainability - not just in terms of energy efficiency, but also in how we create safer, more welcoming places that people feel proud to call home.

In response to concerns raised about safety, poor repair standards, and the general condition of communal spaces, we've taken steps to deliver more sustainable and customer-centered improvements. These include:

- Replacing damaged or insecure communal doors to improve building safety
- Planning retrofit works such as new heating systems, improved insulation, and LED lighting to reduce energy use and lower bills
- Improving bin storage, recycling facilities, and landscaping to enhance the environment around our homes
- Designing safer, more accessible outdoor spaces based on local feedback
- Engaging customers early in the process to shape improvement plans that reflect their priorities

We're also reviewing how we manage buildings and maintenance in the longer term - making sure our homes remain safe, efficient and well cared for as part of our commitment to sustainable neighbourhoods and excellent customer experience.

These improvements show how complaints and local insight are helping us take action - not just to fix what's wrong today, but to build homes and communities that work better for the future.



## Customer Hub

We've made some important changes to improve how customers experience our Customer Hub. We know how crucial it is to speak to someone quickly when you need help - and feedback told us this wasn't always happening.

In response, we've focused on making it easier for customers to reach the right support first time. By upskilling our team to handle income, tenancy and repair enquiries directly, we've cut down on transfers and callbacks - improving first contact resolution. As a result, more calls are being answered and wait times are falling. We've also made it easier to find help online, so customers can get answers quickly without needing to call.

We're encouraged by the progress so far, but this remains a key area of focus. Improving access to support is part of our wider service transformation work and we'll continue listening and learning to make sure our Customer Hub works better for everyone.



## Customer Safety

We've reflected on feedback from complaints and the Housing

Ombudsman to strengthen how we manage anti-social behaviour (ASB), safeguarding, and tenancy issues. These improvements are helping us act earlier, respond more consistently, and provide better support to those who need it most.

Dedicated case officers are now assigned to manage ASB cases from start to finish, ensuring quicker action and better communication. Quality checks are in place to make sure cases are well-managed, with accurate records and timely follow-up.

A Noise App has also been introduced, giving residents a simpler, faster way to report noise issues - removing the need for paper diary sheets and helping us gather evidence more efficiently.

Our Domestic Abuse Policy has been updated, introducing a Target Hardening offer to help residents feel safer at home. We've also committed to achieving Domestic Abuse Housing Alliance (DAHA) accreditation. Our updated approach recognises that people with past abuse experiences may still be at risk.

All frontline staff receive enhanced training - and our Safeguarding Forum brings teams together from across Orbit to share learning, review practice, and ensure no concerns are missed.

## Appendix: Self-Assessment Against the Housing Ombudsman's Complaint Handling Code

Each year, we carry out a self-assessment against the Housing Ombudsman's Complaint Handling Code to ensure we continue to meet best practice and regulatory expectations.

We regularly engage with customers on our complaint handling performance, offering them opportunities to scrutinise the service, hold us to account, and shape how we improve. As part of this commitment, we worked with our Complaints Scrutiny and Co-Creation Group to complete this year's self-assessment.

In April 2025, we completed the review, our engaged customers have confirmed that they are satisfied our current approach aligns with the standards set out in the Code.

A copy of the completed self-assessment is included in the appendix.



## Section 1: Definition of a complaint

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                   | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                                                                                              |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1.2</b>     | A complaint must be defined as:<br><br>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.'                                                                                                        | Yes              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | We use the Housing Ombudsman Service definition of a complaint.<br><br>This is explained in section 2.2 of our Complaints and Customer Care Policy.                                                                                                                                   |
| <b>1.3</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | We handle all third party or representative complaints in line with our Complaints and Customer Care policy, this is detailed in section 3.1.                                                                                                                                         |
| <b>1.4</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Both definitions of a service request and a complaint are adopted in our Complaints and Customer Care policy.<br><br>Our definition of a service request is covered in section 2.1.<br><br>Service requests are currently recorded, monitored, and reviewed on our customer relations |
| <b>1.5</b>     | 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              | Complaints and Customer Care Procedure<br><br>Training material and logs of attendance                                                                                                                           | This is captured in our Complaints and Customer Care procedure and the teams responsible for managing service requests have been sufficiently trained.                                                                                                                                |
| <b>1.6</b>     | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes              | Customer feedback procedures<br><br>Training material and logs of attendance                                                                                                                                     | Any customer feedback surveys include information to customers on how to raise a complaint.<br><br>All customer feedback teams, and relevant partners are trained on our complaints process.                                                                                          |

## Section 2: Exclusions



| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                          |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2.1</b>     | 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.<br>Each complaint must be considered on its own merits.                                                                                                                                                                                                                                                                                                                                                             | Yes              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Complaints and Customer Care policy details our reasons for exclusions, which is detailed in section 4.2.<br><br>We do also make it clear in section 7.2 that all cases must be considered on its own merits. |
| <b>2.2</b>     | 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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul> Matters that have previously been considered under the complaints policy. | Yes              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Complaints and Customer Care policy sets out our exclusions to our complaints process in section 4.2.                                                                                                         |
| <b>2.3</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | We make it clear in section 7.2 that all cases must be considered on its own merits and therefore issues raised 12 months after it occurs may still be considered.                                                |

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                         | Comply: Yes / No | Evidence                                                                                                                                                                                                                                   | Commentary / explanation                                                                                                                                                                                                                         |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2.4</b>     | 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 | Yes              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> Exclusion template letter | When we refuse to accept a complaint, an exclusion letter is sent to the customer explaining the reasons and the right to take the decision to the Ombudsman.<br><br>This is detailed in section 7.3 of our Complaints and Customer Care Policy. |



|            |                                                                                                                                        |     |                                                                                                                                                                                                                  |                                                                                                                                                                                                                     |
|------------|----------------------------------------------------------------------------------------------------------------------------------------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | Ombudsman may tell the landlord to take on the complaint.                                                                              |     |                                                                                                                                                                                                                  |                                                                                                                                                                                                                     |
| <b>2.5</b> | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Complaints and Customer Care policy details our reasons for exclusions, which is detailed in section 4.2.<br><br>We do also make it clear in section 7.2 that all cases must be considered on their own merits. |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Commentary / explanation                                                                                                                                                                                                                                                                                                                |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.1</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy">www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy</a><br><br><a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | We provide several channels for customers to be able to report a complaint. These are detailed in section 5.2 of our Complaints and Customer Care policy.<br><br>Section 6 of our Complaints policy also details how we comply with the Equality Act 2010 and what reasonable adjustments we can offer customers in raising complaints. |
| <b>3.2</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                                                                                                                                                                                                                                           | All operational teams have been trained on our Complaints and Customer Care policy and process.<br><br>Our Complaints policy includes the option for customers to be able to raise a complaint with any member of staff under section 5.2.                                                                                              |

|            |                                                                                                                                                                                                                                                                                  |     |                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                             |
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| <b>3.3</b> | 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 | Performance reports such as our annual report to customers<br><br>Complaints Scrutiny & Co-Creation group minutes                                                                                                                                                  | We understand this and regularly review our performance information to ensure our complaints process is accessible.<br><br>Our Complaints Scrutiny & Co-Creation group also scrutinise this through our quarterly meetings. |
| <b>3.4</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy">www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy</a> | Our complaints process and policy is published on our customer website.                                                                                                                                                     |

| Code provision | Code requirement                                                                                                                                                                         | Comply: Yes / No | Evidence                                                                                                                                                                                                                                                           | Commentary / explanation                                                                                                                                                          |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.5</b>     | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.                                       | Yes              | <a href="http://www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy">www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy</a> | Our Complaints and Customer Care Policy and the Housing Ombudsman code is published on our customer website.                                                                      |
| <b>3.6</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                   | Any third party or representative can raise and deal with a complaint on a customer's behalf. This is detailed in section 3.1 and 3.2 of our Complaints and Customer Care Policy. |

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| <b>3.7</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Template letters<br><br><a href="http://www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy">www.orbitcustomerhub.org.uk/contact-us/complaints/#:~:text=We%20ask%20that%20you%20let,in%20line%20with%20our%20policy</a> | The Housing Ombudsman details are provided within our complaints leaflet, stage two final response letters, exclusion letters, and on our customer website. |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                                                                                                                                                                                                                                   | Commentary / explanation                                                                                                                                                                                                                            |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                           | Our Customer Resolutions team are responsible for complaint handling, overseen by a dedicated Head of Service.<br><br>Our Complaints Policy and Insight team are responsible for liaising with the Ombudsman and ensuring we learn from complaints. |
| <b>4.2</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Roles and Responsibilities section | All employees are responsible for supporting our Complaints teams. This is covered in the table of responsibilities in section 12 of our policy.                                                                                                    |
| <b>4.3</b>     | 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              | Training material and logs                                                                                                                                                                                                                                 | All relevant colleagues and partners are trained on our Complaints and Customer Care policy.                                                                                                                                                        |

## 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                                                                       | Our Customer Resolutions team are responsible for complaint handling, overseen by a dedicated Head of Service.<br><br>Our Complaints Policy and Insight team are responsible for liaising with the Ombudsman and ensuring we learn from complaints. |
| 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                                                                       | All employees are responsible for supporting our Complaints teams. This is covered in the table of responsibilities in section 12 of our policy.                                                                                                    |
| 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                                                                       | All relevant colleagues and partners are trained on our Complaints and Customer Care policy.                                                                                                                                                        |
| 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Complaints and Customer Care Procedure<br><br>Complaints training material and attendance logs | All relevant colleagues and partners are trained on our Complaints and Customer Care policy.                                                                                                                                                        |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                                                                                                                                                                                                                 | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Complaints and Customer Care Procedure<br><br>Complaints training material and attendance logs | All partners are trained on our Complaints and Customer Care policy.<br><br>Our partners and third parties are all expected to follow and support our Complaints and Customer Care procedures.                 |
| 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Acknowledgement template letter                                                                | Our acknowledgement letters will always contain our understanding of the complaint and the outcomes the customer is seeking.<br><br>This is covered in section 7.4 of our Complaints and Customer Care policy. |
| 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a><br><br>Acknowledgement template letter                                                                | Our acknowledgement letters will indicate which aspects of a customer complaint we are and are not responsible for.                                                                                            |
| 5.8 | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li><b>a.</b> deal with complaints on their merits, act independently, and have an open mind;</li> <li><b>b.</b> give the resident a fair chance to set out their position;</li> <li><b>c.</b> take measures to address any actual or perceived conflict of interest; and</li> <li><b>d.</b> consider all relevant information and evidence carefully.</li> </ul> | Yes | Complaints and Customer Care Procedure                                                                                                                                                                                                                                                                                 | Our Complaints and Customer Care procedure details how our Customer Resolutions team should treat all complaints at each stage of the process.                                                                 |



| Code provision | Code requirement                                                                                                                                                                                                                                                                                                 | Comply: Yes / No | Evidence                                                                                                                                                                                                                                                                       | Commentary / explanation                                                                                                                                                                                                                                                                                               |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.9</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                               | Our Complaints and Customer Care policy states in section 7.6 that where a response to a complaint falls outside of the timescales set out in our policy, we will agree suitable intervals to keep them updated.<br><br>Our Policy timescales align to the Housing Ombudsman code.                                     |
| <b>5.10</b>    | 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              | Additional Assistance and Reasonable Adjustment Policy<br><br><a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our approach to making reasonable adjustments is included within section 6 of our Complaints and Customer Care policy.<br><br>In addition to this, we also have an Additional Assistance and Reasonable Adjustment policy which covers how we record and review disclosed information about a customer's disabilities. |
| <b>5.11</b>    | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a>                                                               | All reasons for exclusions are covered in section 4.2 of our Complaints and Customer Care Policy.                                                                                                                                                                                                                      |
| <b>5.12</b>    | 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              | Complaints and Customer Care Procedure                                                                                                                                                                                                                                         | Details on how to log and record complaints by the Customer Resolutions team are captured in our Complaints and Customer Care procedure.                                                                                                                                                                               |

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| <b>5.13</b> | 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 | Complaints Resolution Policy<br><a href="http://www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf">www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf</a> | Our approach to applying resolution and remedies to complaints is covered in our Complaints Resolution Policy.                                              |
| <b>5.14</b> | 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 | Unacceptable Behaviour Policy<br><a href="http://www.orbitcustomerhub.org.uk/media/1vibcs3i/unacceptable-behaviourpolicy-v1-0.pdf">www.orbitcustomerhub.org.uk/media/1vibcs3i/unacceptable-behaviourpolicy-v1-0.pdf</a>          | Details of how we manage unacceptable behaviour can be found in our Unacceptable Behaviour policy.                                                          |
| <b>5.15</b> | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.                                                                                                              | Yes | Unacceptable Behaviour Policy<br><a href="http://www.orbitcustomerhub.org.uk/media/1vibcs3i/unacceptable-behaviourpolicy-v1-0.pdf">www.orbitcustomerhub.org.uk/media/1vibcs3i/unacceptable-behaviourpolicy-v1-0.pdf</a>          | Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate our regard for provisions for the Equality Act 2010. |

## Section 6: Complaints Stages - Stage 1

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                        | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                                                                                                                      |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>6.1</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Within our Customer Resolutions teams, we have specialist teams who are trained to support customers with complex complaints or support requirements.<br><br>This specialist team provides an opportunity for the remaining teams to be able to focus on resolving the other complaints as early as possible. |
| <b>6.2</b>     | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.                                                                                                                                                                                                                                                    | Yes              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our timescale for logging and acknowledging complaints is 5 working days of the complaint being received and is covered in section 7.4 of our policy.                                                                                                                                                         |

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| <b>6.3</b> | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.                                                                                                                                                                                                            | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Customer Resolutions team must issue a full response at stage 1 within 10 working days of the complaint being acknowledged. This is covered in section 7.5 of our policy.                                    |
| <b>6.4</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | We will only extend complaints for good reason, and we will explain this to customers. Our approach to extensions is covered under section 7.7 in our policy.                                                    |
| <b>6.5</b> | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.                                                                                                                                                                                  | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Customer Resolutions team will provide customers with the contact details for the Ombudsman when we inform a customer about an extension to our timescales. This is covered under section 7.8 of our policy. |

| Code provision | Code requirement                                                                                                                                                                                                                                                                                  | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                                                                                                                  |
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| <b>6.6</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Customer Resolutions team will issue a response to a customer when an answer is known and is detailed under section 7.11 of our policy.<br><br>Our After Care team will track all outstanding actions and provide appropriate updates to customers. This is covered under section 7.11 of our policy. |
| <b>6.7</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Section 7.12 of our Complaints and Customer Care policy details what information will be provided to customers during a response to their complaint.                                                                                                                                                      |

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| <b>6.8</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Information on how we handle residents raising additional complaints during an investigation is covered under section 7.13 of our policy.                                                                                                                                                                                     |
| <b>6.9</b> | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br><br><b>a.</b> the complaint stage;<br><b>b.</b> the complaint definition;<br><b>c.</b> the decision on the complaint;<br><b>d.</b> the reasons for any decisions made;<br><b>e.</b> the details of any remedy offered to put things right;<br><b>f.</b> details of any outstanding actions; and<br><b>g.</b> details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Complaint and Customer Care Procedure<br><br>Complaint response letter templates                                                                                                                                 | All complaint response letters will include details of the complaint stage, definition, decision, reasons for the decision, details of any resolutions, identify any outstanding actions and escalation details.<br><br>Responses to complaints are regularly monitored and reviewed through our Quality Assurance framework. |

## Section 6: Complaints Stages - Stage 2

| Code provision | Code requirement                                                                                                                                                                                   | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                            |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| <b>6.10</b>    | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 7.14 of our Complaints and Customer Care policy. |
| <b>6.11</b>    | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 7.15 of our Complaints and Customer Care policy. |

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| <b>6.12</b> | 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 | Complaints and Customer Care procedure<br><br>Training material and attendance logs                                                                                                                              | Customers are not required to explain their reasons for requesting a stage 2 review.                                                                              |
| <b>6.13</b> | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.                                                                                                                                                                                                             | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Within our Customer Resolutions teams, we have separate teams who deal with stage 1 and stage 2 investigations. This can be found under section 12 of our policy. |
| <b>6.14</b> | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.                                                                                                                                                                                                                  | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 7.16 of our Complaints and Customer Care policy.                                                                                               |
| <b>6.15</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 7.16 of our Complaints and Customer Care policy.                                                                                               |
| <b>6.16</b> | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.                                                                                                                                                                                  | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 7.17 of our Complaints and Customer Care policy.                                                                                               |

| Code provision | Code requirement                                                                                                                                                                                                                                                                                  | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                                                                |
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| <b>6.17</b>    | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Customer Resolutions team will issue a response to a customer at stage 2 when an answer is known and is detailed under section 7.11 of our policy.<br><br>Our After Care team will track all outstanding actions and provide appropriate updates to |



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|             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |     |                                                                                                                                                                                                                  | customers. This is covered under section 7.11 of our policy.                                                                                                                                                                                                                                                                     |
| <b>6.18</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Section 7.12 of our Complaints and Customer Care policy details what information will be provided to customers during a response to their complaint.                                                                                                                                                                             |
| <b>6.19</b> | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br><br><b>a.</b> the complaint stage;<br><br><b>b.</b> the complaint definition;<br><br><b>c.</b> the decision on the complaint;<br><br><b>d.</b> the reasons for any decisions made;<br><br><b>e.</b> the details of any remedy offered to put things right;<br><br><b>f.</b> details of any outstanding actions; and<br><br><b>g.</b> details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied | Yes | Complaint and Customer Care Procedure<br><br>Complaint response letter templates                                                                                                                                 | Stage 2 complaint response letters will include details of the complaint stage, definition, decision, reasons for the decision, details of any resolutions, identify any outstanding actions and escalation details.<br><br>Responses to complaints are regularly monitored and reviewed through our Quality Assurance framework |
| <b>6.20</b> | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                                                                                                | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Covered in section 12 of our Complaints and Customer Care policy.                                                                                                                                                                                                                                                                |

## Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| <b>7.1</b> | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf">www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf</a>                 | Covered in section 4.1 and 4.2, 5 and 6 of our Complaints Resolution Policy.                           |
| <b>7.2</b> | Any remedy offered must reflect the impact on the resident as a result of any fault identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf">www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf</a>                 | Covered in section 6.2 and 6.3 of our Complaints Resolution Policy.                                    |
| <b>7.3</b> | 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 | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Customer After Care team will track any remedies through to completion.                            |
| <b>7.4</b> | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Yes | <a href="http://www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf">www.orbitcustomerhub.org.uk/media/wychjvil/complaintsresolution-policy-final-v1-0.pdf</a>                 | Our Complaints Resolution Policy has been developed using the Housing Ombudsman Guidance for Remedies. |

## Section 8: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| <b>8.1</b> | <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"> <li><b>a.</b> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li><b>b.</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;</li> <li><b>c.</b> any findings of non-compliance with this Code by the Ombudsman;</li> <li><b>d.</b> the service improvements made as a result of the learning from complaints;</li> <li><b>e.</b> any annual report about the landlord's performance from the Ombudsman; and</li> <li><b>f.</b> any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes | Annual Complaints Performance and Service Improvement report | We have worked with our Complaints Scrutiny & Co-creation group to produce our annual Complaints Performance and Service Improvement report and self-assessment against the code. |
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| Code provision | Code requirement                                                                                                                                                                                                                                                                            | Comply: Yes / No | Evidence                                                     | Commentary / explanation                                                                                                                                                                                                                                                  |
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| <b>8.2</b>     | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this. | Yes              | Annual Complaints Performance and Service Improvement report | Our annual complaints Performance and Service Improvement report has been reported to OGB. Their response is published alongside this on our complaints page on our customer website.<br><br>It is also shared with the Customer Experience & Service Delivery Committee. |
| <b>8.3</b>     | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.                                                                                                                                                                    | Yes              | N/A                                                          | We have not carried out a significant restructure, merger or had any changes in procedures so we have carried out our annual assessment as required.                                                                                                                      |
| <b>8.4</b>     | Landlords may be asked to review and update the selfassessment following an Ombudsman investigation.                                                                                                                                                                                        | Yes              | N/A                                                          | We have not been subject to an Ombudsman investigation and therefore we have not been                                                                                                                                                                                     |

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|            |                                                                                                                                                                                                                                                                                                                    |     |     | required to update the self-assessment in this instance.                                                     |
| <b>8.5</b> | 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 | N/A | We haven't experienced any exceptional circumstances; therefore, we have not had to carry out these actions. |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement                                                                                                                                                                                                                                       | Comply: Yes / No | Evidence                                                                                                                                                                                                         | Commentary / explanation                                                                                                                                                                                                                            |
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| <b>9.1</b>     | 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              | Annual report to customers<br>Link to performance page                                                                                                                                                           | Our Complaints Insight Leads analyse complaints data, themes, and trends to identify improvements.                                                                                                                                                  |
| <b>9.2</b>     | 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              | Annual report to customers<br>Link to performance page                                                                                                                                                           | Our Complaints Insight Leads analyse complaints data, themes, and trends to identify improvements.                                                                                                                                                  |
| <b>9.3</b>     | 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              | Complaints Scrutiny & Co-Creation group notes<br>Link to performance page                                                                                                                                        | We regularly report our learning from complaints to customers through dedicated Complaints Scrutiny & Co-Creation Group.                                                                                                                            |
| <b>9.4</b>     | 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              | <a href="http://www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf">www.orbitcustomerhub.org.uk/media/or0lkyrh/complaints-and-customer-care-policy-final-v4-0.pdf</a> | Our Head of Customer Resolutions is accountable for complaint handling and analysing themes or trends to identify potential systemic issues, serious risks and policies that require revision.<br><br>This is captured in section 12 of our policy. |

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| <b>9.5</b> | 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 | MRC Terms of reference | We appointed an MRC from our governing body in October 2022. In June 2024, we have revised the terms of reference for this role. |
| <b>9.6</b> | 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 | MRC Terms of reference | We appointed an MRC from our governing body in October 2022. In June 2024, we have revised the terms of reference for this role  |

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Comply: Yes / No | Evidence                                                 | Commentary / explanation                                                                                                                                                                                                                                                                            |
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| <b>9.7</b>     | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li><b>a.</b> regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance</li> <li><b>b.</b> regular reviews of issues and trends arising from complaint handling;</li> <li><b>c.</b> regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li><b>d.</b> annual complaints performance and service improvement report.</li> </ul> | Yes              | Customer Experience & Service Delivery Committee agendas | <p>The MRC regularly receives performance information, complaints insight and information on Housing Ombudsman investigations and determinations.</p> <p>The Customer Experience &amp; Service Delivery Committee review and approve our Complaints Performance and Service Improvement report.</p> |

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| 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"> <li><b>a.</b> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li><b>b.</b> take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li><b>c.</b> act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes | <p>Board meeting minutes</p> <p>Complaints Customer Scrutiny group minutes</p> <p>Programme 160 assurance plan</p> | <p>The ethos of our approach is that the complaints team works with operational teams to resolve complaints, not deal with complaints for operational teams. It is therefore a requirement of every Orbit employee to work with the complaints team to resolve customer issues, and to learn from those complaints.</p> <p>We share complaints insight and data with Boards, Leadership team, Operational teams and customer scrutiny groups and ensure complaints insight informs improvement and transformation plans.</p> |
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