

Keelman Complaints Handling Code Self-assessment April 2024

The assessment is in relation to the joint Keelman and Karbon Complaints, Compliments and Suggestions Policy Version 2.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints, Compliments and Suggestions policy page 5, line 3.4.1	This definition was adopted in March 2021 and has remained in our Complaints, Compliments and Suggestions policy ever since.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints, Compliments and Suggestions policy page 5, point 3.5.3 states that: <i>A customer does not have to use the word 'complaint' for it to be treated as one. If a customer expresses dissatisfaction, we will give them the option to make complaint.</i> In points 3.2.1; 3.4.3; 4.9.4 we state how customers can complain through a third party.	In our Complaints, Compliments and Suggestions policy we outline that customers do not need to use the word complaint and that we accept complaints through 3 rd parties or representatives. Keelman Homes employs Karbon Homes as their service provider. As such, Keelman incorporate Karbon's customer leaflet, audio video and dedicated complaint section on their website as part of our policies. This is due to Karbon being contracted to carry out such works on our behalf. Keelman also provide links or signpost to independent advice and support.

1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints, Compliments and Suggestions policy service request definition is on page 3.	<p>In our Complaints, Compliments and Suggestions policy we define a service request.</p> <p>Karbon's customer leaflet also explains further about service requests.</p> <p>Karbon records service requests on Keelman's behalf in the appropriate system, including their main database Capita.</p>
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints, Compliments and Suggestions policy, point 3.5.4 states that: <i>3.5.4 A complaint will be raised at the customer's request, even if the handling of the service request remains ongoing. We will not stop acting on a service request if the customer complains.</i>	In our Complaints, Compliments and Suggestions policy we support this.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>The joint Keelman Karbon policy is published on the Keelman Homes website: www.keelmanhomes.org</p> <p>The words in the telephone script: <i>If you are dissatisfied with the service provided by Karbon they do have a complaints process you can access by calling 0808 164 0111 or info@karbonhomes.co.uk and you can find more information on their website</i></p>	<p>In Karbon's telephone survey scripts they include an explanation on how a customer can pursue a complaint.</p> <p>The Karbon Complaint, Compliment and Suggestions procedure further outlines the responsibility of their team who manages our survey partners.</p>

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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints, Compliments and Suggestions policy, point 3.6.1 states that: <i>Complaints will be considered in its individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.</i>	In our Complaints, Compliments and Suggestions policy we support this.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 	Yes	Complaints, Compliments and Suggestions policy, point 3.6.1 states those mentioned in the code, plus: service requests, the issue occurred over 12 months ago, annual rent and service charge increases which must be escalated through the First Tier Tribunal, services not within our control e.g. Utilities, complaints about our money advice service heard in line with the Financial Conduct Authority process.	In our Complaints, Compliments and Suggestions policy we support this.

<p>2.3</p>	<p>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.</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions policy, point 3.5.5 states <i>Complaints must be raised within 12 months, as close as possible to when the issue first arose or when the customer first became aware of the problem.</i></p> <p>3.6.1 also states that: <i>Complaints will be considered in its individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.</i></p> <p>3.6.2 also states that: <i>Unless there is good reason, complaints excluded from our complaints process are (where)... issue giving rise to the complaint occurred over twelve months ago.</i></p> <p>4.9.3 also states: <i>If a complaint is raised or escalated outside of the 12 months, we apply discretion to accept those outside this time limit, where there are good reasons to do so.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p>
<p>2.4</p>	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions policy, point 3.6.1 states that: <i>Complaints will be considered in</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p>

	the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		<i>its individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.</i>	Keelman also provide colleagues a letter template to use to ensure the explanation is clear and to share the Ombudsman’s role, contact details and their right to take this to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints, Compliments and Suggestions policy, point 3.6.1 states: <i>Complaints will be considered in its individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.</i> 3.6.2 lists scenarios where we will not hear a complaint and at the start states that: <i>Unless there is good reason...</i>	In our Complaints, Compliments and Suggestions policy we support this. For those handling complaints, Karbon provide guidance on assessing the complaint, considering the context of the complaint and the complainant.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the	Yes	Complaints, Compliments and Suggestions policy, point 3.2.1 outlines all the different channels through which customers can make a complaint, including email,	In our Complaints, Compliments and Suggestions policy we support this. Karbon’s letter templates either seek to clarify any required adjustments or

	<p>needs and reasonable adjustments of residents who may need to access the complaints process.</p>		<p>telephone, writing, with a colleague, Direct Messages on Karbon social media and through an advocate.</p> <p>Section 9 in the policy outlines our equality and diversity position including the Public Sector Equality Duty and Equality Act.</p>	<p>clarifies what has been agreed.</p> <p>Our customer materials are presented in different formats, with more versions available on request, to ensure the service is accessible.</p>
<p>3.2</p>	<p>Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions policy, point 3.2.1 states that customers can express a complaint: <i>Face to face with any Keelman or Karbon colleague or a contractor working on our behalf</i></p> <p>Karbon's own procedure outlines: <i>Where a customer expresses dissatisfaction, seek to support them within their remit and seek clarification if the customer wants to raise a complaint. If the customer wants to complain, the colleague will record a complaint on the ICT system the day it is received, or the next working day. If they cannot do this, then they should raise this to a colleague who can record it or signpost the customer to contact the Customer Relationship Team who can do this.</i></p> <p>Keelman has adopted a similar approach to ensure consistency if a</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p>

			customer approached Keelman directly rather than using Karbon	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Complaints, Compliments and Suggestions policy, point 2.1 states that: <i>Both Keelman and Karbon are committed to providing an excellent customer service, through the effective handling and learning from complaints, compliments and suggestions</i></p> <p>At 3.1 it states: <i>We want to ensure all customers can raise a complaint when they want to and the process is clear and easy to follow.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this by expressing our commitment to complaints and our complaint culture.</p> <p>Karbon’s customer materials and dedicated section on the website welcomes complaints.</p> <p>Keelman regularly provides tenants the opportunity to respond to surveys over our/Karbon’s performance. These answers are collated and reviewed with any results/actions published online and through the post</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website.	Yes	<p>The Complaints, Compliments and Suggestions policy is published on our website,</p> <p>Karbon also publish their policy with the policy section and the dedicated complaint section on their website.</p> <p>The two-stage process is explained in 4.1.1- 4.1.2. Standards including timescales are outlined in 4.4.1 and 4.4.2.</p> <p>Then through 4.5- 4.9.7 we explain each stage and how escalations work.</p>	<p>Our Complaints, Compliments and Suggestions policy we support this.</p> <p>Keelman and Karbon’s customer materials, including a leaflet (plaint text version), audio video and infographic present the process in different ways, to ensure this is accessible to customers.</p>

<p>3.5</p>	<p>The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions policy, point 3.1.2 states how we communicate how to make a complaint.</p> <p>Sections 3.3.1- 3.3.3 outlines the role of the Ombudsman and how to contact them.</p> <p>Karbon’s website and customer materials are all found on the dedicated website section.</p> <p>Keelman publishes complaints information on our website.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Karbon’s dedicated section on their website and our customer materials, namely leaflet, video and infographic all present the role of the Ombudsman for customers.</p> <p>Keelman’s complaint policy and self-assessment reviews are published online to provide tenants regular updates with the role of the Ombudsman for customers</p>
<p>3.6</p>	<p>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.</p>	<p>Yes</p>	<p>Our Complaints, Compliments and Suggestions policy provides a definition of an advocate. In section 3.2.1 we offer a range of ways for customers to make a complaint including: <i>Via a Councillor, MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation) or advocate.</i></p> <p>In 4.9.4 we also explain different adjustments including: <i>Allowing complaints raised or supported through a customer’s designated advocate. This could be an MP, Councillor, third party or a family member. Support may include</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p>

			<i>representing or accompanying customers in meetings.</i>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>Complaints, Compliments and Suggestions policy, sections 3.3.1-3.3.3 outline the role of the Ombudsman and how to contact them.</p> <p>Karbon's website and customer materials are all found on the dedicated website section.</p> <p>Keelman publishes complaints information on our website.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Keelman have an infographic which outline to colleagues the communication points where the customer should be informed about their right to access the Ombudsman and how they can do this. We have provided letter templates to colleagues to ensure this is consistent.</p> <p>Karbon's dedicated section on their website and our customer materials, namely leaflet, video and infographic all present the role of the Ombudsman for customers.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>Karbon operates a devolved approach to complaint handling, with appropriate operational colleagues handling complaints.</p> <p>Their Customer Experience team provide a central support, which includes Ombudsman liaison. From this team, the Customer Feedback Specialist is responsible for</p>	Our Complaints, Compliments and Suggestions procedure outlines for colleagues the roles across the organisation including: complaint handling, Ombudsman Liaison and Board reporting.

			<p>Ombudsman liaison, whilst colleagues in the team may support in their absence.</p> <p>The Head of Customer Experience is responsible and Assistant Director of Customer Experience accountable for providing the Karbon Group Board with the quarterly and annual reporting.</p> <p>Keelman Homes Managing Director is the MRC for complaint handling at Keelman. This includes liaising with the Ombudsman.</p> <p>Complaints relating to the services Karbon provides are usually managed by Karbon and reported to Keelman, but Keelman retains overall responsibility of Keelman customer complaints. t</p>	
4.2	<p>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.</p>	Yes	<p>Complaints, Compliments and Suggestions procedure outlines the role of the Complaint Handler and Customer Experience team.</p> <p>For Complaint Handlers, we indicate the level of role in the organisation, at each stage, so we they have the authority and autonomy to act.</p> <p>Keelman Homes is a micro-organisation, so all staff are suitably</p>	<p>In our Complaints, Compliments and Suggestions procedure we support this.</p>

			<p>trained in the importance of complaint handling. However, there are clear policies outlining Karbon and Keelman’s respective roles when it comes to complaints handling. This ensures a consistent approach to complaints handling across the two companies.</p>	
4.3	<p>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</p>	Yes	<p>Complaints, Compliments and Suggestions policy, section 6 outlines our approach to continuous learning and Improvement. Section 4.3.2 also outlines our complaint culture for complaint handlers, which is expanded on in our procedure.</p> <p>Keelman emphasises the importance to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	<p>In our Complaints, Compliments and Suggestions policy we support our approach to learning from complaints.</p> <p>Karbon’s procedure provides guidance to colleagues of the process and best practice.</p> <p>Karbon provide a Learning Management system which includes modules for complaint handlers, on the procedure, best practice and system. Where any changes arise, we brief relevant colleagues through our intranet and directly to complaint handlers via email. Formal 121 and team training session are provided as required, for new colleagues, where new systems have been introduced and for teams requiring additional guidance. Keelman Homes’ colleagues can be included in these processes as and when required</p>

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	Complaints, Compliments and Suggestions policy outlines our culture, Karbon and Keelman's respective procedures go further- highlighting our values and behaviours, not least the way we work with our customers whether they complain or not.	We have one Complaints, Compliments and Suggestions policy. Our complaint culture, outlined in our procedures outline for colleagues how we treat customers.
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	Complaints, Compliments and Suggestions policy explains the two-stage process in 4.1.1 and 4.1.2. In section 4.3.4 the complaint handler is tasked to: <i>They will consider the context of the complaint including factors in 4.3.2 and 4.3.3, and the customer's preferences, to consider which complaints can be responded to as early as possible, and which require further investigation.</i> 4.3.5 states: <i>Appropriate remedies can be provided at any stage of the complaint, and we will continue to resolve issues alongside any necessary investigation. This is without prejudicing consideration of the complaint or delaying the response timescales.</i>	In our Complaints, Compliments and Suggestions policy we support this, with a two-stage process.

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints, Compliments and Suggestions policy explains the two-stage process in 4.1.1 and 4.1.2.	In our Complaints, Compliments and Suggestions policy we support this.
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	Keelman Homes has a joint complaint process with Karbon Homes. Stage 1 complaints are handled solely by Karbon, whilst stage 2 complaints are handled by Karbon but reviewed by Keelman Homes before submission. There are clear policies outlining Karbon and Keelman's respective roles when it comes to complaints handling. This ensures a consistent approach to complaints handling across the two companies. This is detailed in 4.2.1	In our Complaints, Compliments and Suggestions policy we support this.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints, Compliments and Suggestions policy illustrates that Karbon will hear all complaints. Karbon and Keelman have worked together to create a joint complaints policy who are also regulated by the Housing Ombudsman. This ensure all customers complaints are handled consistently regardless of whether they complained direct to Keelman or Karbon.	In our Complaints, Compliments and Suggestions policy we support this.

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	Complaints, Compliments and Suggestions policy, point 4.3.3 states that the complaint handler’s role includes: <i>Engaging with the customer as appropriate, they will clarify, record and act on:</i> <ul style="list-style-type: none"> - <i>What the complaint is about – the complaint definition</i> - <i>What outcome/s would resolve the matter for the customer</i> 	In our Complaints, Compliments and Suggestions policy we support this. We provide letter templates for colleagues to ensure this is applied consistently.
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	Complaints, Compliments and Suggestions policy, point 4.3.3 states that the complaint handler’s role includes: <i>Engaging with the customer as appropriate, they will clarify, record and act on:</i> <ul style="list-style-type: none"> - <i>If appropriate, what elements we are not responsible for</i> 	In our Complaints, Compliments and Suggestions policy we support this. We provide letter templates for colleagues to ensure this is applied consistently.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Complaints, Compliments and Suggestions policy, point 4.3.2 states this	In our Complaints, Compliments and Suggestions policy we support this.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident	Yes	Complaints, Compliments and Suggestions policy, point 4.3.6 states: <i>They will agree with the customer the</i>	In our Complaints, Compliments and Suggestions policy we support this.

	suitable intervals for keeping them informed about their complaint.		<i>frequency and method of communication and then maintain contact as agreed. Where a response will fall outside original timescales, they will agree with the customer how they will keep them informed.</i>	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints, Compliments and Suggestions policy, point 4.9.4 states: <i>For customers requiring adjustments, together we will consider options and agree what is reasonable in the circumstances, keeping this under review.</i> This goes on to list examples of adjustments. Point 4.9.2 states: <i>If there is a need to deal with a complaint differently, we will agree this with the customer, record why this is, and confirm this in writing or in an appropriate way.</i>	In our Complaints, Compliments and Suggestions policy we support this.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	In the Complaints, Compliments and Suggestions policy, in addition to points 3.6.1 and 3.6.2 referring to sections 3, point 4.7.2 <i>We will escalate a complaint unless there is a valid reason not to do so. Each case will be considered on its own merits.</i>	In our Complaints, Compliments and Suggestions policy we support this.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the	Yes	Complaints, Compliments and Suggestions policy, point 4.3.7 states: <i>The complaint handler will ensure a full record of the complaint is</i>	In our Complaints, Compliments and Suggestions policy we support this.

	resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		<i>maintained on our system. This will include the original complaint, date received, all correspondence with the customer and relevant parties, any supporting documentation such as reports or surveys, outcomes at each stage and any learnings.</i>	Meetings are held monthly and reports issued quarterly to discuss Keelman customer matters such as complaints. When a complaint is received by either Keelman or Karbon both parties are notified and an appropriate complaint handler is appointed. Information is saved on both company ICT systems.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints, Compliments and Suggestions policy, point 4.3.5 states: <i>Appropriate remedies can be provided at any stage of the complaint, and we will continue to resolve issues alongside any necessary investigation. This is without prejudicing consideration of the complaint or delaying the response timescales.</i>	In our Complaints, Compliments and Suggestions policy we support this.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Complaints, Compliments and Suggestions policy, point 4.9.5 states: <i>Our Unacceptable Customer Behaviour Policy sets out our approach to managing the very few customers whose actions or behaviour are considered unacceptable. If a customer's behaviour is hampering the progress of the complaint, this will be explained to them, to get to a position to respond to their complaint. Where this persists, we will conclude the complaint based on available</i>	In our Complaints, Compliments and Suggestions policy we support this. We have an Unacceptable Customer Behaviour Policy

			<i>information.</i>	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our Complaints, Compliments and Suggestions policy and Unacceptable Customer Behaviour Policy both make provisions for the Equality Act.	Our Complaints, Compliments and Suggestions policy and Unacceptable Customer Behaviour Policy both support this.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints, Compliments and Suggestions policy explains in section 4.3.4 the complaint handler is tasked to: <i>They will consider the context of the complaint including factors in 4.3.2 and 4.3.3, and the customer's preferences, to consider which complaints can be responded to as early as possible, and which require further investigation.</i> 4.3.3 refers to the complaint definition, any risks and customer vulnerabilities.	In our Complaints, Compliments and Suggestions policy we support this.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.1 states the standards at stage 1 and this includes this.	In our Complaints, Compliments and Suggestions policy we support this. Our internal literature further outlines

				<p>this for colleagues. Karbon also have system alerts and reporting in place to manage this performance.</p> <p>Keelman staff deadlines are diarised to ensure responses to timescale are achieved.</p>
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.1 states the standards at stage 1 and this includes this. This is reiterated in 4.5.3 where we explain the information requirements at completion of stage 1	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our internal literature further outlines this for colleagues. Karbon also have system alerts and reporting in place to manage this performance.</p> <p>Keelman staff deadlines are diarised to ensure responses to timescale are achieved.</p>
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.1 states the standards at stage 1 and this includes this.	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our internal literature further outlines this for colleagues. Karbon also have system alerts and reporting in place to manage this performance.</p> <p>Keelman staff deadlines are diarised to ensure responses to timescale are achieved.</p>
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints, Compliments and Suggestions policy, point 3.3.1 states: <i>Customers can obtain advice from the Ombudsman throughout a complaint. Acknowledgement, extension and</i>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our letter templates include these as standard.</p>

			<i>response letters contain their contact details.</i>	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>Complaints, Compliments and Suggestions policy, point 4.5.1 states: <i>We will provide a complaint response when this is known, in line with our published timescales. Complaints will be responded to, where rectification plans are in place but may not have been concluded. This means not waiting for the completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Cases are closed once all actions are completed.</i></p> <p>4.3.8 states: <i>The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Karbon’s complaint system supports recording and tracking of actions.</p> <p>Keelman have monthly operational meetings with Karbon to ensure actions are being completed.</p>
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Complaints, Compliments and Suggestions policy, point 4.3.3 states that the complaint handler will clarify, record and act on the complaint definition.</p> <p>Template letters support clarifying the reasons for decisions and sharing relevant information.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our letter templates ensure that these sections are all included in the response letter.</p>

6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaints, Compliments and Suggestions policy, point 4.5.2 states: <i>Where a customer raises additional issues during the investigation, these will be incorporated into the response if they are related, and the response has not been issued. Where the 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 will be logged as a new complaint.</i>	In our Complaints, Compliments and Suggestions policy we support this. Our procedural flowchart further outlines for colleagues how this is implemented.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Complaints, Compliments and Suggestions policy states at 4.3.1 that complaint handler is responsible to respond. These requirements are also referenced explicitly in 4.5.3	In our Complaints, Compliments and Suggestions policy we support this.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints, Compliments and Suggestions policy, point 4.1.2 states: <i>If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it will be escalated to stage 2. Customers can request for their complaint to be escalated to stage 2 with the person hearing their stage 1, or by any of the other contact methods listed in section 3.2.1. Stage 2 is our final response.</i>	In our Complaints, Compliments and Suggestions policy we support this.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.2 states the standards at stage 2 and this includes this.	In our Complaints, Compliments and Suggestions policy we support this. Karbon have system alerts and reporting in place to manage this performance. Keelman staff deadlines are diarised to ensure responses to timescale are achieved.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Complaints, Compliments and Suggestions policy, point 4.7.3 states: <i>Customers are asked, but not required to explain their reasons for requesting escalation to stage 2, so the investigation can address these concerns.</i>	In our Complaints, Compliments and Suggestions policy we support this. Karbon customer team have outlines for colleagues on how they can do this including arranging contact to understand why the customer remains unhappy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints, Compliments and Suggestions policy, point 4.3.1 states: <i>A different complaint handler is allocated at each stage, to investigate</i>	In our Complaints, Compliments and Suggestions policy we support this.

			<i>and respond.</i>	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.2 states the standards at stage 2 and this includes this.	In our Complaints, Compliments and Suggestions policy we support this. Karbon also have system alerts and reporting in place to manage this performance. Keelman staff deadlines are diarised to ensure responses to timescale are achieved.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints, Compliments and Suggestions policy, point 4.4.2 states the standards at stage 2 and this includes this.	In our Complaints, Compliments and Suggestions policy we support this. Karbon also have system alerts and reporting in place to manage this performance. Keelman staff deadlines are diarised to ensure responses to timescale are achieved.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints, Compliments and Suggestions policy, point 3.3 states: <i>Customers can obtain advice from the Ombudsman throughout a complaint. Acknowledgement, extension and response letters contain their contact details.</i>	In our Complaints, Compliments and Suggestions policy we support this. Letter templates include these as standard.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the	Yes	Complaints, Compliments and Suggestions policy, point 4.5.1 states: <i>We will provide a complaint response when this is known, in line with our</i>	In our Complaints, Compliments and Suggestions policy we support this. Karbon's complaint system supports

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		<p><i>published timescales. Complaints will be responded to, where rectification plans are in place but may not have been concluded. This means not waiting for the completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Cases are closed once all actions are completed.</i></p> <p><i>4.3.8 states: The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed.</i></p>	recording and tracking of actions.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Complaints, Compliments and Suggestions policy, point 4.3.2 states that the complaint handler will clarify, record and act on the complaint definition.</p> <p>Template letters support clarifying the reasons for decisions and sharing relevant information.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Letter templates ensure that these sections are all included in the response letter.</p>
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; 	Yes	<p>Complaints, Compliments and Suggestions policy states at 2.20 that complaint handler is responsible to respond.</p> <p>The supporting letter templates.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>The letter template lays these out.</p>

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Complaints, Compliments and Suggestions policy, point 4.1.2 states that Stage 2 is our final response.</p> <p>At 4.4.2 we state that Stage 2 cases are heard by a Head of Service, Assistant Director, Director or Executive Director.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>All complaints at Step 2 are notifiable to the Managing Director of Keelman Homes so that Keelman has the opportunity to comment on responses/agree remedial action.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been 	Yes	<p>Complaints, Compliments and Suggestions policy, point 4.6.2 states: <i>Where something has gone wrong, any remedy reflects the impact of all failures on the customer. This may include apologising,</i></p> <ul style="list-style-type: none"> <i>Apologising</i> <i>Acknowledging where things have gone wrong</i> 	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our internal documents further outlines for colleagues different ways to act and then how they determine the appropriate actions. The response letter templates lay this out for colleagues to follow.</p> <p>The Compensation and Goodwill Policy</p>

	<ul style="list-style-type: none"> • delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<ul style="list-style-type: none"> • <i>Providing an explanation, assistance or reasons</i> • <i>Taking action if there has been delay</i> • <i>Reconsidering or changing a decision</i> • <i>Amending a record or adding a correction or addendum</i> • <i>Providing a financial remedy</i> • <i>Changing policies, procedures or practices.</i> 	outlines the approach for financial remedies.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints, Compliments and Suggestions policy, point 4.6.2 states: <i>Where something has gone wrong, any remedy reflects the impact of all failures on the customer.</i>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Internal training further outlines this for colleagues and letter templates lay this out for colleagues to follow.</p> <p>The Compensation and Goodwill Policy outlines the approach for financial remedies.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints, Compliments and Suggestions policy, point 4.3.8 states: <i>The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed.</i>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Letter templates lay this out for colleagues.</p> <p>The Compensation and Goodwill Policy outlines the approach for financial remedies.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Complaints, Compliments and Suggestions policy	The Complaints, Compliments and Suggestions policy and Compensation and Goodwill policy were developed

			Compensation and Goodwill Payment policy	considering Ombudsman guidance.
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Complaints, Compliments and Suggestions policy, point 6.3 states: <i>On a quarterly basis, information will be reported to the Keelman Homes Board, Karbon Customer Committee, KMT and Karbon's Resident Committee. The report must include all complaints, compliments and suggestion statistics, plus details of any 'lessons learned' and recommendations for service improvements.</i></p> <p>Then in 6.4: <i>Learnings from complaints are routinely shared internally through Keelman Homes, reported quarterly with the Karbon Customer Committee, Karbon Management Team and Karbon Resident Committee and published to customers via both company's websites, customer emails, customer magazine and Karbon's Customer Annual Report.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this annual report. However, Karbon also provides this quarterly for our relevant customers, to ensure scrutiny and challenge through the year.</p> <p>Keelman will be developing a new method of reporting performance measures to Keelman residents. As a very small provider of affordable homes, our activities continue to evolve and through a new Customer Engagement and Communication Strategy we will be improving our reporting to customers.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<p>Complaints, Compliments and Suggestions policy, point 6.1 states: <i>Annually we will self-assess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked.</i></p> <p>Annual complaints performance and service improvement report and Board response will be added to Keelman Homes website</p>	<p>In our Complaints, Compliments and Suggestions policy and procedure we support this.</p> <p>Our self-assessment is published on the Keelman Homes website.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<p>Complaints, Compliments and Suggestions policy, point 6.1 states: <i>Annually we will self-assess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our self-assessment is published on the Keelman Homes website</p>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<p>Complaints, Compliments and Suggestions policy, point 6.1 states: <i>Annually we will self-assess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked.</i></p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>Our self-assessment is published on the Keelman Homes website</p>

8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Complaints, Compliments and Suggestions policy, point 4.9.6 states: <i>If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to customers who may be affected and publish this on our website. This includes sharing a timescale for returning to compliance with the Code.</i>	In our Complaints, Compliments and Suggestions policy we support this. In the event of an exceptional circumstance effecting Keelman’s or Karbon’s ability to comply with the code, Keelman’s Managing Director would notify the Ombudsman.
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaints, Compliments and Suggestions procedure outlines the responsibilities for learning and continuous improvement. Point 6.5 states: On a quarterly basis information regarding Keelman Homes’ customer complaints (if investigated or reviewed by Karbon), compliments and suggestions is reported by Karbon to Keelman Homes. The report contains ‘Key performance measures’. Keelman Homes’ Operations Manager is responsible for identifying trends in these service areas and considering whether	In our Complaints, Compliments and Suggestions policy we support this.

			service improvements can be made as a result of any learning from this information.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaints, Compliments and Suggestions policy, point 6.5 states: On a quarterly basis information regarding Keelman Homes' customer complaints (if investigated or reviewed by Karbon), compliments and suggestions is reported by Karbon to Keelman Homes. The report contains 'Key performance measures'. Keelman Homes' Operations Manager is responsible for identifying trends in these service areas and considering whether service improvements can be made as a result of any learning from this information.	In our Complaints, Compliments and Suggestions policy we support this. KPI reports issued quarterly include Karbon's management of any Keelman customer complaints they have responded to. Performance meetings are held with Karbon quarterly.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Complaints, Compliments and Suggestions policy, point 6.4 states: Learning from complaints are routinely shared internally at Keelman Homes with staff members and the Non-Executive Board, reported quarterly with the Karbon Customer Committee, Karbon Management Team and Karbon Resident Committee and published to customers via both company's websites, customer emails, customer magazine and Karbon's Customer Annual Report.	In our Complaints, Compliments and Suggestions policy we support this. KPI reports issued quarterly include Karbon's management of any Keelman customer complaints they have responded to. Performance meetings are held with Karbon quarterly.

<p>9.4</p>	<p>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.</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions procedure states at point 6.6:</p> <p>Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture at Karbon. Keelman Homes' Managing Director is the 'Member Responsible for Complaints' (MRC) at Keelman, and works alongside Karbon's MRC on all issues relating to Keelman Homes' tenants. Keelman's MRC, working with the Keelman Board, carries out analysis of performance relating to complaint handling.</p>	<p>In our Complaints, Compliments and Suggestions procedure we support this.</p> <p>The Head of Customer Experience is our senior lead person accountable for complaint handling at Karbon Homes.</p> <p>The Managing Director is the senior lead person accountable for complaint handling at Keelman Homes</p>
<p>9.5</p>	<p>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').</p>	<p>Yes</p>	<p>Complaints, Compliments and Suggestions policy, point 6.6 states:</p> <p>Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture at Karbon. Keelman Homes' Managing Director is the 'Member Responsible for Complaints' (MRC) at Keelman, and works alongside Karbon's MRC on all issues relating to Keelman Homes' tenants. Keelman's MRC, working with the Keelman Board, carries out analysis of performance relating to complaint</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>The Chair of the Karbon Customer Committee is the MRC, who is a Group Board member.</p> <p>Karbon's Executive Director of Customer Service is the senior executive to oversee the operational side of complaints.</p> <p>The Managing Director is the MRC for Keelman Homes. Complaints, compliments and suggestions are reported quarterly to the Keelman Board.</p>

			handling.	
9.6	<p>The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.</p>	Yes	<p>Complaints, Compliments and Suggestions policy, point 6.6 states: Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture at Karbon. Keelman Homes' Managing Director is the 'Member Responsible for Complaints' (MRC) at Keelman, and works alongside Karbon's MRC on all issues relating to Keelman Homes' tenants. Keelman's MRC, working with the Keelman Board, carries out analysis of performance relating to complaint handling.</p>	<p>In our Complaints, Compliments and Suggestions policy we support this.</p> <p>As chair of the Karbon Customer Committee and Group Board member they lead on the Board's authority to oversee complaint performance. They receive quarterly and annual performance reporting and commission work as required to gain reassurance and assurance.</p> <p>This is supported by the Executive Director of Customer Service.</p> <p>Complaints are reported quarterly to Keelman's MRC and to the Keelman Board. Each time a new complaint is received by a Keelman resident, this is relayed to Keelman Homes Managing Director.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of 	Yes	<p>Suggestions policy, point 6.6 states: Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture at Karbon. Keelman Homes' Managing Director is the 'Member Responsible for</p>	<p>The chair of the Karbon Customer Committee and Group Board member receives this information quarterly.</p> <p>Karbon's Executive Director of Customer Service is the senior executive to oversee the operational side of complaints.</p>

	<p>the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>Complaints’ (MRC) at Keelman, and works alongside Karbon’s MRC on all issues relating to Keelman Homes’ tenants. Keelman’s MRC, working with the Keelman Board, carries out analysis of performance relating to complaint handling.</p>	<p>Keelman Homes’ MRC works alongside Karbon’s Customer Experience Team on all issues relating to Keelman Homes’ tenants</p>
<p>9.8</p>	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	<p>Yes</p>	<p>At Karbon, Complaints, Compliments and Suggestions procedure establishes the responsibility of all colleagues, highlighting our values and behaviours, not least the way we work with our customers, highlighting they will:</p> <p>d. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>e. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>f. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> <p>Keelman and Karbon share the same cultural values (adopting appropriate Karbon policies) and adopt a customer first approach; our staff</p>	<p>In our Complaints, Compliments and Suggestions policy supports this.</p>

			focus on ensuring the customers interests are kept central to all of the work we do.	
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