

Luton Community Housing Ltd (trading as Squared) Complaints Handling Code - Self-Assessment Form – September 2025

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1 - Definition of a complaint

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 1.1 | Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint. | Yes | <p>At Squared we welcome feedback from our customers and see complaints as an opportunity to learn, review and inform our service delivery improvements and develop our team members.</p> <p>This is defined in section 1.1 'Purpose and context' section of our Complaints Policy: GEN04 Complaints Policy.</p> |

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| | | | Our Complaints Policy has been reviewed in line with the requirements and guidance of the Housing Ombudsman Complaint Handling Code and includes the definition of a complaint under section 4.1 of the policy. |
| 1.2 | <p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’</i></p> | Yes | <p>Detailed in our Complaints Policy under section 4.1.</p> <p>Included in Squared’s Complaints Training - Relevant team members across Squared are undertake the following Housing Ombudsman e-learning modules:</p> <ul style="list-style-type: none"> • Dispute Resolution • Applying Dispute Resolution Principles <p>In-house face to face training sessions on the practical application of effective complaints handling at Squared were held on:</p> <ul style="list-style-type: none"> • 8th July 2024 • 18th July 2024 • 9th October 2024 <p>In September 2025:</p> <ul style="list-style-type: none"> • 84% of our staff team have been through Housing Ombudsman e- |

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| | | | <p>learning module "Dispute Resolution Training"</p> <ul style="list-style-type: none"> 71% of our staff team have been through Squared's internal training program in 2024/2025 "Effective Complaints Handling". <p>This percentage will vary due to staff turnover, therefore we will be carrying out an annual refresher.</p> |
| 1.3 | <p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p> | Yes | <p>Detailed in our Complaints Policy under 4.1.</p> <p>Squared training ensures that our team members have a good level of listening skills and an understanding of interpreting feedback from any individual or group; and are able to differentiate between a complaint and a service request.</p> <p>We experienced one case in the previous financial year (2023/24), highlighted on receipt of a Complaints Handling Failure Order dated 19th December 2023 (CHFO – Dec 23), whereby a Customer's issues and dissatisfaction with a service were not treated as a formal complaint. The complaint was resolved during 2024/24 financial year. As this was raised in the previous year we have recorded that we</p> |

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| | | <p>have been fully compliant with this requirement during 2024/25.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out in 2024 to all team members.</p> <p>An Effective Complaints Handling Toolkit was developed during 2024 to provide guidance to our team members.</p> <p>Our team members now have a shared understanding of the effective handling of complaints and the Complaints Handling Code and Squared is now fully compliant against requirement 1.3 of the Code.</p> |
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| <p>1.4</p> | <p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy.</p> <p>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.</p> | <p>Yes</p> | <p>The difference between a service request and a complaint is detailed in our Complaints Policy under 4.2.</p> <p>Service requests are recorded on our Housing Management System (MRI Housing Enterprise) and monitored and reviewed regularly.</p> <p>Squared training ensures that our team members have a good level of listening skills and an understanding of interpreting feedback from any individual or group; and are able to differentiate between a complaint and a service request.</p> <p>During 2024/25 one complaint was not acknowledged on time due to time clarifying whether a service request or complaint, however it was resolved within the policy timeframes.</p> <p><i>See 1.3 above re non-compliant case: CHFO – Dec 23:</i></p> <p>In the case of the CHFO in 2023/24 team member/s treated an issue which constituted a complaint as a service request; as such the complaints policy was not followed at the time. However team members now understand the difference and therefore this was resolved.</p> |
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| | | <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out in July 2024 onwards to all team members. The training incorporated effective communication skills in gaining clarity about customer issues and dissatisfaction and recognising the difference between a service request and a complaint.</p> <p>An Effective Complaints Handling Toolkit was developed during 2024 to provide guidance to our team members.</p> <p>In September 2025:</p> <ul style="list-style-type: none"> • 84% of our staff team have been through Housing Ombudsman e-learning module "Dispute Resolution Training" • 71% of our staff team have been through Squared’s internal training program in 2024/2025 "Effective Complaints Handling". <p>Team members have a shared understanding of the effective handling of complaints and the Complaints Handling Code and Squared is fully compliant against requirement 1.4 of the Code.</p> |
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| 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 | <p>This is now standard practice at Squared if a customer is dissatisfied with the response to their service request.</p> <p>Our Maintenance and Repairs service issue/telephone customers following works carried to provide our customers with opportunity to feedback with regards to their satisfaction level. Survey response feedback is shared with the relevant team to follow up with the customer and inform service improvements and instigate the complaints process where relevant.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out on 4th July 2024 onwards to all team members. This training incorporates effective communication skills in gaining clarity about customer issues and dissatisfaction and recognising the difference between a service request and a complaint.</p> <p>An Effective Complaints Handling Toolkit was developed during 2024 to provide guidance to our team members.</p> <p>In September 2025:</p> |
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| | | | <ul style="list-style-type: none"> 84% of our staff team have been through Housing Ombudsman e-learning module "Dispute Resolution Training" 71% of our staff team have been through Squared's internal training program in 2024/2025 "Effective Complaints Handling". <p>Team members now have a shared understanding of the effective handling of complaints and the Complaints Handling Code and Squared is fully compliant against requirement 1.5 of the Code.</p> |
| 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 | Squared issues surveys on overall tenant satisfaction, repairs satisfaction and as relevant on specific topics throughout the year; and makes follow up calls where a customer has expressed dissatisfaction. Customers are reminded that a complaint may be made if they wish. |

Section 2 – Exclusions

| Code section | Code requirement | Compliance: Yes /No / Partial | Evidence, commentary and any explanations |
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| 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 | <p>Our Complaints Policy sets out specific situations whereby we would not accept a complaint under section 5.7.</p> <p>The exception to this is the handling of the customer's complaint referred to within the CHFO – Dec 23, which then resulted in the formal complaints procedure being followed. This was resolved during 2024/25 financial year.</p> <p>This was a learning for Squared, resulting in team development and service improvement - this requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out in July 2024 onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit was developed in 2024 to provide guidance to our team members.</p> <p>In September 2025:</p> <ul style="list-style-type: none"> 84% of our staff team have been through Housing Ombudsman e- |

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| | | | <p>learning module "Dispute Resolution Training"</p> <ul style="list-style-type: none"> 71% of our staff team have been through Squared's internal training program in 2024/2025 "Effective Complaints Handling". <p>Through training our team members now have a shared understanding of the effective handling of complaints and the Complaints Handling Code and Squared is fully compliant against requirement 2.1 of the Code.</p> |
| 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.</p> <p>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 | <p>Our Complaints Policy includes information with regards to 'acceptable exclusions' which includes issues giving rise to the complaint occurring twelve months ago.</p> <p>Our policy also details that 'we may consider complaints outside this timeframe where there is good reason to do so'.</p> <p>The Complaints Policy includes a section that explains to the reader that there may be instances when a matter will not be considered under that policy. It sets out examples. It ensures however that safeguarding or health and safety issues that will have normally elapsed will</p> |

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| | | | continue to be considered under the policy. |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Our Complaints Policy details conditions relating to within a 12 month timescale, with discretion to consider complaints outside this timeframe where there is good reason to do so. |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable or the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | Detailed in our Complaints Policy. A templated letter is provided to our team members for use in the procedure. It is set out so that reasons and details can be provided to explain the decision as well as reminder that the Housing Ombudsman can be engaged if the complainant is still unhappy with the decision. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | In line with our commitment to Fairness, Respect, Equality, Diversity, Inclusion and Engagement (FREDIE) we treat each customer and their complaint fairly considering individual circumstances. |

Section 3 - Accessibility and awareness

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 3.1 | <p>Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.</p> <p>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.</p> | Yes | <p>In line with our commitment to Fairness, Respect, Equality, Diversity, Inclusion and Engagement (FREDIE) we treat each customer fairly and consider the needs and reasonable adjustments of customers who may need to access the complaints procedure.</p> <p>Customers are able to use the following to make a complaint to Squared:</p> <ul style="list-style-type: none"> - Email - Telephone - In person - Via website - Via Tenant Portal - Letter - Social media - via a representative or third party |
| 3.2 | <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> | Yes | <p>At Squared we welcome complaints to ensure customer satisfaction and inform service improvements. A customer may wish to make a complaint in any way and with any member of our team.</p> <p>Team members across Squared services have received training on effective handling of complaints and are able to</p> |

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| | | | <p>pass details of a complaint received to the appropriate colleague within the organisation.</p> <p>In September 2025:</p> <ul style="list-style-type: none"> • 84% of our staff team have been through Housing Ombudsman e-learning module "Dispute Resolution Training" • 71% of our staff team have been through Squared's internal training program in 2024/2025 "Effective Complaints Handling". |
| 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>At Squared any number of complaints are welcomed. Customer voice is encouraged.</p> <p>Communications will be reviewed and enhanced where relevant with regards to complaints and performance reporting to our customers to ensure transparency.</p> <p>Complaints and our handling of them have been discussed at the Customer Engagement Group and customer feedback considered to inform our practices moving forwards.</p> |

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| 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>Squared's Complaint Policy is available via our Tenant Portal, website and on request.</p> <p>Our Squared website/Tenant Portal has 'Recite Me' accessibility software linked which allows customers to translate information.</p> <p>Our policy details the two-stage process, to manage the expectations of our customers with regards to what will happen at each stage and details our response timeframes.</p> |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code. | Yes | <p>Detailed in our Complaints Policy.</p> <p>Our Complaints Policy includes details of how the customer can view it. This information is available via our Tenant Portal and website and can be found in the footer section of every page of our website, and in hard copy format.</p> <p>The policy includes information about the Ombudsman and the Code.</p> |

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| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord. | Yes | <p>Team members are trained to identify and offer reasonable adjustments or to respond to such requests.</p> <p>This is reflected in our policy. Our policy was produced taking into consideration the Equality Act 2010.</p> |
| 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>Squared's Tenant Portal and website contain this information permanently.</p> <p>It is also detailed in our online Tenant Handbook and highlighted at customer sign up.</p> <p>Our policy references the Housing Ombudsman's Complaint Handling Code to assure the reader that every care has been taken to demonstrate Squared's culture of continuous improvement and compliance.</p> |

Section 4 - Complaint handling personnel

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 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 | Our Complaints Officer is: Jacky Constantine – Business Support & Governance Manager, supported by Claire Bryan – Business Support & Governance Director This team member ensures effective management of complaints and liaison with the Ombudsman across Squared and reports to the Board of Management, liaising with the governing Member Responsible for Complaints (the MRC). |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly. | Yes | Jacky Constantine sits on the senior operational management team with access to all managers and team members across Squared; with the authority and autonomy to act to resolve disputes promptly and fairly; presenting complaints reporting to the Board. Claire Bryan sits on the Executive Leadership Team reporting directly to the Chief Executive and Board. |
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. | Yes | Both Jacky Constantine and Claire Bryan have undertaken the Housing |

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| | <p>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> | <p>Ombudsman e-learning training courses on Dispute Resolution and Applying Dispute Resolution Principles and have attended a training day on “Effectively Managing Housing Complaints”.</p> <p>Relevant team members across Squared undertake the following Housing Ombudsman e-learning modules:</p> <ul style="list-style-type: none"> • Dispute Resolution; • Applying Dispute Resolution Principles. <p>In-house face to face training sessions on practical application of effective complaints handling at Squared were held on:</p> <ul style="list-style-type: none"> • 8th July 2024 • 18th July 2024 • 9th October 2024 <p>Refresher training is now scheduled annually.</p> <p>In September 2025:</p> <ul style="list-style-type: none"> • 84% of our staff team have been through Housing Ombudsman e-learning module "Dispute Resolution Training" • 71% of our staff team have been through Squared’s internal training |
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| | | | <p>program in 2024/2025 "Effective Complaints Handling".</p> <p>Team members have access to learning resources on the HQN website and Squared is a member of benchmarking groups.</p> <p>All team members are encouraged and empowered to resolve complaints at the earliest stage. In the event they are unable to resolve it with the customer, the relevant Service Manager will handle a complaint about their service supported by the Complaints Officer as necessary.</p> |
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Section 5 – The Complaint Handling Process

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 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 | <p>Our GEN 04 Complaints Policy is in place for dealing with complaints covered by the Housing Ombudsman Complaints Handling Code, which reflects the requirements and best practice guidance provided.</p> <p>We aim to always adopt a fair approach in all situations.</p> <p>We accept complaints from customers representatives and are happy for a customer to be represented or accompanied at any meetings. This is included in the policy.</p> |
| 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 | <p>Complaints are handled as quickly as reasonably possible in line with our staged approach timescales.</p> <p>If clarification is required we will contact the customer via their preferred method of communication.</p> |

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| | | | <p>Complaints are logged on our Complaints Log via our Housing System, on MRI.</p> <p>Our complaints policy and procedure ensure team members acknowledge and log a complaint within 5 days of receipt.</p> <p>There are only two stages to our complaints procedure.</p> <p>Team members receive training and ongoing coaching from the People Excellence team, the Complaints Officer and their line managers around complaint handling and focus on fairness, equality accessibility and clarity of communication to our customers throughout the process.</p> <p>Our Complaints Log holds all correspondence relating to a complaint with any confidential /sensitive documents held securely.</p> |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | Our Complaints Policy has only two stages. |
| 5.4 | Where a landlord's complaint response is handled by a third party (for example a contractor or independent adjudicator) at any stage, it must form | Yes | Our Complaints Policy has only two stages. No third parties have handled customer complaints in 2024-25. |

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| | part of the 2 stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | | |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | In the future should any third parties handle complaints we will ensure these are handled in accordance with the Code. |
| 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 | <p>We log complaints on our internal Complaints Log via our Housing Management System (MRI Housing Enterprise).</p> <p>The service manager or Head of Service will handle the complaint at stage 1 with access to all parties involved to gain a clear understanding of the complaint.</p> <p>At stage 2 the complaint will be handled by a more senior manager.</p> <p>At all times, whoever is investigating is trained to remain impartial and investigate fully before reaching a conclusion.</p> <p>Our template acknowledgement letter and stage 1 and 2 response letters provide ensure the ‘complaint definition’ is covered.</p> |

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| 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 | As above. |
| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind give the resident a fair chance to set out their position take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully | Yes | <p>As above.</p> <p>All relevant members of the team at Squared are trained, or are undergoing training, in the effective handling/ management of complaints.</p> <p>In September 2025:</p> <ul style="list-style-type: none"> 84% of our staff team have been through Housing Ombudsman e-learning module "Dispute Resolution Training" 71% of our staff team have been through Squared's internal training program in 2024/2025 "Effective Complaints Handling". <p>Refresher training is now scheduled annually.</p> |
| 5.9 | Where a response to a complaint will fall outside the timescales set out in this Code the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes | A discussion or email exchange is undertaken with our customers should it be deemed that a response will fall outside of a timescale as set out in the Code and our Complaints Policy, to agree an extension and keep the customer informed on progress. |

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| | | | <p>Training is undertaken for team members and they have access to an Effective Complaints Handling Toolkit for added guidance.</p> <p>Squared is now fully compliant against requirement 5.9 of the Code.</p> |
| 5.10 | <p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.</p> <p>Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p> | Yes | <p>Protected characteristics of our customers are securely recorded on our Housing Management System (MRI Housing Enterprise) and these will be referred to during the handling of complaints to ensure reasonable adjustments are made where appropriate. These will be recorded.</p> |
| 5.11 | <p>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.</p> | Yes | <p>In relation to the complaint escalated to a CHFO (Dec 23); we did not accept the customers issue as a formal complaint at first and provided reasons; however this was overturned by the Ombudsman and the complaint process then followed upon their advice.</p> <p>This was a learning for Squared, resulting in team development and service improvement - this requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out in July 2024 onwards to all team members.</p> |

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| | | | <p>An Effective Complaints Handling Toolkit was also developed to provide guidance to our team members.</p> <p>Our team members have a shared understanding of the effective handling of complaints and the Complaints Handling Code and Squared is now fully compliant against requirement 5.11 of the Code.</p> |
| 5.12 | <p>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.</p> | Yes | <p>We log complaints on our internal Complaints Log via our Housing Management System (MRI Housing Enterprise) with supporting documentation.</p> <p>Following the CHFO in Dec 2023 Squared is now fully compliant with requirement 5.12 of the Code.</p> <p>This requirement of the Code is now incorporated into our mandatory in-house Complaints Handling training programme which was rolled out in July 2024 onwards to all team members.</p> <p>An Effective Complaints Handling Toolkit was also developed to provide guidance to our team members.</p> |

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| | | | We have a complaints management module on our new Housing Management System (MRI Housing Enterprise) which was originally scoped to ensure our record-keeping and reporting tools were improved. |
| 5.13 | Landlords must have processes in place to ensure that a complaint can be remedied at any stage of its complaints process. Landlords must ensure that appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Yes | We actively encourage early and effective complaints resolution to complaints aiming to resolve a complaint in line with our staged timescales but where delay is unavoidable residents are kept updated and advised when a response can be expected. A Compensation Policy is available. |
| 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 | Our Tenant Handbook and Occupancy Agreements set out reasonable behaviour for our customers. Our Complaints Policy also includes a section about “unacceptable behaviour from resident and their representatives when pursuing a complaint”. |
| 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 | Consideration regarding restrictions on contact due to unacceptable behaviour would be proportionate and demonstrate regard for the provisions of the Equality Act 2010 should the need arise for managing unacceptable behaviour resulting in restrictions being put in place. |

Section 6 - Complaint stages (1 and 2)

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| STAGE 1 | | | |
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | <p>Our training for team members encourages urgency and early resolution of complaints where possible, including engaging in dialogue with the customer at an early stage to clarify the details and required outcome and answering a complaint along with the acknowledgment where appropriate.</p> <p>During 2024-25 very few stage one complaints escalated to stage two; only three out of 28.</p> |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received. | Partial | We adhere to these timings within our Complaints Policy; however, one complaint was not acknowledged within the 5 working day timescale during 2024-25 due to the time taken to clarify whether it was a complaint or service request. The complaint itself was resolved within the defined timeframe. |

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| | | | During the year Complaints Trackers have been built into our system to ensure timeframes are adhered to. |
| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged. | Partial | <p>Twenty-five of the twenty-eight complaints during the year were provided with a full response within the 10 working days of acknowledgement timeframe.</p> <p>During the year Complaints Trackers have been built into our system to help ensure timeframes are met.</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 | We adhere to this approach ensuring that extensions/timings are formally documented and the customer informed. |
| 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 | <p>It had previously been identified in 2023-24 that this did not always happen consistently, therefore our Complaints Policy was amended to say we will provide the Ombudsman's contact details.</p> <p>This requirement is also included in our in-house training programme rolled out in July 2024 and the Effective Complaints Handling Toolkit that was developed to provide guidance to our team members.</p> |

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| | | | Squared is now fully compliant against requirement 6.5 of the Code. |
| 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 | Our responses to complaints are provided on conclusion of the investigation, when the informed decision regarding the complaint is made. Any actions required to address the issue are then recorded, planned and monitored. Outstanding actions are tracked on our Housing Management System (MRI Housing Enterprise). |
| 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 | This is now normal practice at Squared for all complaints received and Squared is fully compliant against requirement 6.7 of the Code. |
| 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 | This is normal practice at Squared for all complaints received and is included in the in-house training on effective complaints handling for our team members. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: e. the complaint stage f. the complaint definition | Yes | This is now normal practice at Squared for all complaints received. |

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| | <ul style="list-style-type: none"> g. the decision on the complaint h. the reasons for any decisions made i. the details of any remedy offered to put things right j. details of any outstanding actions k. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response | | <p>Response letters are documented and filed on our Housing Management System (MRI Housing Enterprise).</p> <p>Squared is fully compliant against requirement 6.9 of the Code.</p> |
| STAGE 2 | | | |
| 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 | This is the approach taken at Squared and detailed in our Complaints Policy. |
| 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 policy amended 2024 to make this timescale more explicit. This is the approach taken at Squared and all records and documentation are recorded and monitored. |
| 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 Policy was previously amended to remove the requirement for the complainant to confirm the reason for escalating the complaint. This requirement is also included in our in-house training programme which was rolled out in July 2024. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | A more senior manager always considers complaints escalated to Stage 2, as detailed in our Complaints Policy. |

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| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged. | Yes | Complaints policy was amended in 2024 to make this timescale more explicit. This is the approach taken at Squared and all records and documentation are recorded and monitored. |
| 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 | When an extension is agreed at stage 2 this is documented formally with the agreement of the customer. |
| 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 | Our Complaints Policy was amended to say we will provide the Ombudsman's contact details. This requirement is also included in our in-house training programme rolled out in July 2024. |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes | Our response to complaints at stage 2 is provided when the informed decision regarding the complaint is made. Any actions required to address the issue are then recorded, planned and monitored. Outstanding actions are tracked on our Housing Management System (MRI Housing Enterprise). |
| 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 | This is the approach taken in response to stage 2 complaints. |

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| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on the complaint; • the reasons for any decisions made; • the details of any remedy offered to put things right; • details of any outstanding actions; and • details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | <p>Yes</p> | <p>This is the approach taken in response to stage 2 complaints.</p> <p>All records and documentation are logged on the Housing Management System (MRI Housing Enterprise).</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> | <p>Yes</p> | <p>A more senior manager leads on stage 2 complaints and responses will involve collaborative working with those relevant team members required to provide the information required to inform a considered response.</p> |

Section 7 - Putting things right

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 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.</p> <p>These can include:</p> <ul style="list-style-type: none"> • Apologising • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay • Reconsidering or changing a decision • Amending a record or adding a correction or addendum • Providing a financial remedy • Changing policies, procedures or practices. | Yes | <p>We treat complaints as an invaluable learning opportunity and are transparent, acknowledging our service failings if something has gone wrong.</p> <p>We will set out our actions to put things right in our response to the customer.</p> <p>Our complaint records held on the Housing Management System (MRI Housing Enterprise) provide examples of where we have apologised, explained, are taken action, or made service improvements of changes to policies and procedures and/or made compensation payments.</p> <p>We have a Compensation Policy.</p> |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | <p>Squared is committed to treating everyone fairly and we always aim to maintain and manage expectations.</p> <p>Remedies are considered carefully, and clear guidelines are set out in the Compensation Policy.</p> |

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| 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 | This is the best practise we would follow in such a circumstance. We also seek advice from our company solicitor as necessary. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Guidelines are set out in the Compensation Policy |

Section 8 – Self-assessment, reporting and compliance

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 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"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements 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 any findings of non-compliance with this Code by the Ombudsman the service improvements made as a result of the learning from complaints any annual report about the landlord's performance from the Ombudsman any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord | Yes | <p>The Squared Self-assessment against the Housing Ombudsman Complaints Handling Code is produced on an annual basis and published on the Squared website, with the Annual Complaints Performance and Service Improvement Report which contains data on complaints, our learnings and actions for improvement.</p> |
| 8.2 | <p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p> | Yes | <p>The Annual Complaints Performance and Service Report and the Self-assessment have been reported to the Board Member Responsible for Complaints for their scrutiny, challenge and response.</p> <p>The MRC's response forms the Board of Management's (Governors) response</p> |

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| | | | <p>and is provided in the submission and published on the Squared website alongside the report.</p> <p>At their Board meeting in September 2025 the Board of Management delegated approval to the MRC; these reports will be presented to the full Board of Management at the Board Meeting in November 2025 to be ratified.</p> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | An annual self-assessment has been carried out. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Squared has not been asked to do this by the Housing Ombudsman to date. However, we have undertaken a self-assessment to ensure best practice and to ensure adherence with the Code. |
| 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 | As per 8.2: The Annual Complaints Performance and Service Report and the Self-assessment have been reported to the MRC for their scrutiny, challenge and response. This forms the Board's response and is provided in the submission and published on the Squared website. These reports will be presented to the full Board at the Board Meeting in November 2025 to be ratified. |

Section 9 – Scrutiny & oversight: continuous learning and improvement

| Code section | Code requirement | Compliance: Yes / No / Partial | Evidence, commentary and any explanations |
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| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes | <p>A debrief meeting is held at both stages 1 and 2 with the relevant team members involved to review learnings from the complaint, to inform service improvements, including team development.</p> <p>Complaints, data and outcomes are discussed in team meetings, operational management meetings and leadership team meetings and is a mandatory agenda item at these monthly meetings.</p> <p>Squared's Annual Reports include the total number of complaints for a year as well as numbers of resolutions and outcomes.</p> <p>Complaint handling feedback from surveys and customer engagement are also used to inform changes in service delivery.</p> <p>Relevant team members across Squared undertake the following training -</p> <p>Housing Ombudsman e-learning modules:</p> |

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| | | | <ul style="list-style-type: none"> Dispute Resolution; Applying Dispute Resolution Principles. <p>In-house face to face training sessions on practical application of effective complaints handling at Squared were rolled out from July 2024 onwards.</p> |
| 9.2 | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes | <p>As for 9.1 above.</p> <p>In addition, this approach is clear in our Complaints Policy and training/guidance to team members.</p> <p>We communicate complaint outcomes with relevant team members relating to any learnings or improvements.</p> <p>A positive complaints culture has been further strengthened through the development of a guidance toolkit for team members on effective complaints handling, and Complaints Trackers on our systems.</p> |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | Yes | <p>As per 9.1 and 9.2 above.</p> <p>Customer feedback on our complaints handling was obtained from our Customer Engagement Group in 2025 and our Star Survey for 2025 is about to be sent to customers to obtain feedback</p> |

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| | | | <p>to inform our TSM data, analysis, and recommendations for service improvement considerations.</p> <p>On receipt of the survey feedback, we will collate our TSM learning outcomes and use this to update our service improvements action plan, which will be published and shared with our customers, and other stakeholders on our website and Tenant Portal.</p> <p>Complaints analysis reports are shared with the Board of Management on a quarterly basis.</p> <p>Squared's Annual Reports include the total number of complaints for a year as well as numbers of resolutions and outcomes.</p> |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Yes | <p>The Business Support & Governance Director is the responsible Director for complaint handling.</p> <p>We analyse information and practices to inform and improve our service delivery and monitor and control potential risks, reporting any serious risks arising from complaints to the MRC and Board of Management.</p> |

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| | | | Complaints analysis reports are shared with the Board of Management on a quarterly basis. |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). | Yes | Our Member Responsible for Complaints is Jo Simcox, who sits on the Board of Management with full voting rights. |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes | <p>The MRC receives quarterly reports on complaints performance, which are also presented with and discussed at the full Board of Management meetings.</p> <p>The MRC also provides the governing body response to this annual Self-assessment.</p> |
| 9.7 | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul 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 the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings • annual complaints performance and service improvement report | Yes | <p>The papers and reports provided to the MRC and Board of Management cover the requirements of the Code.</p> <p>Any updates and amendments made to the Complaints Policy are also presented at the next available full Board of Management meeting.</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"> 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 c. act within the professional standards for engaging with complaints as set by any relevant professional body | Yes | <p>These requirements are covered in team member training programmes.</p> <p>Squared also has a behaviour framework linked to Squared's values, which includes expected behaviours which link to effective complaints handling.</p> |
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