



## **Summary of changes to Complaints Policy in response to HOS Recommendations**

Following the submission of our annual self-assessment in June, MTVH was one of the first landlords to undergo one of the Housing Ombudsman Service's new 'Duty to Monitor' reviews. The Social Housing (Regulation) Act (2023) places a duty on the Housing Ombudsman Service to monitor compliance with its complaints handling code, as part of which, the ombudsman now reviews annual self-assessment submissions and provides feedback. This process is designed to support landlords in improving complaint handling practices for residents and effective scrutiny and oversight of our complaints service.

MTVH has implemented all of the recommendations made by the ombudsman, and our republished Complaints Policy is now available to read [on our website](#). Board Member, Helen Cope, welcomed the findings of the review and the opportunity to work collaboratively with the Housing Ombudsman Service to improve the experience for MTVH customers.

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As the Chair of Customer Service Committee & Board Member Responsible for Complaints I welcomed the feedback received from the Housing Ombudsman Service. As one of the first landlords to go through the Duty to Monitor process, we found their recommendations to be both fair and constructive. This has directly informed our updated Complaints Policy and revised Self-Assessment. More importantly, it has enabled us to apply a stronger customer friendly lens not only to our complaint policy but across all our policies at MTVH. We are committed to learning and taking actions that lead to improvements in our services.

Helen Cope

Customer Services Committee Chair

## Summary of changes to Complaints Policy in response to HOS Recommendations

Code Provision & Requirement	HOS Recommendation	Changes to Policy
<p><b>1.3</b> - A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	<p>MTVH should make sure its policy clearly explains that when a resident is unhappy or raises a concern, they have the option to make a formal complaint if they want to.</p>	<p><b>1. Purpose</b></p> <p>Amended first paragraph to address this and emphasise our problem-solving approach, taking effective and timely action to put things right for residents.</p>
<p><b>1.3</b> - A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	<p>MTVH should make sure its policy explains clearly that residents do not have to use the word 'complaint' for it to be treated as such.</p>	<p><b>2. Scope &amp; Definitions</b></p> <p>Added wording to the definition of <b>Complaint</b> to address this.</p> <p>Also added illustrative examples to definition of <b>Service Request</b> to more clearly differentiate between the two.</p>
<p>This was not a HOS recommendation, but an improvement identified during the policy review process.</p>		<p><b>2. Scope &amp; Definitions</b></p> <p>Amended definition of <b>Resolution</b>.</p>
<p><b>1.5</b> - A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.</p>	<p>MTVH should review its policy to include that the landlord will raise a complaint if the resident is not happy with the response to their service request, and a complaint will not prevent or impact on actions needed to resolve any immediate issues (i.e. the service request).</p>	<p><b>3.1 How you can make a complaint</b></p> <p>Added paragraph stating that customers can complain about how we are handling ongoing service requests, and this will not delay or prevent their resolution.</p>
<p>This was not a HOS recommendation, but an improvement identified during the policy review process.</p> <p>(In that our policy lacked clarity on this aspect of our approach.)</p>		<p><b>3.2 How we assess your complaint</b></p> <p>Added a new section explaining our triage process and the three possible outcomes, i.e. complaint, excluded complaint, service request.</p>
<p><b>6.2</b> - Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.</p>	<p>MTVH should update its complaints policy to clearly explain that all complaints will be identified, acknowledged, and recorded within five working days of being received.</p>	<p><b>3.2 How we assess your complaint</b></p> <p>Moved wording addressing the complaint acknowledgement letter to this section and added "within 5 working days".</p>

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<p><b>5.6</b> - 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.</p>	<p>MTVH should update its policy to explain that when a complaint is made, the landlord will confirm their understanding of the issue, discuss what outcomes the resident wants, and make clear which parts they are responsible for and which they are not.</p>	<p><b>3.2 How we assess your complaint</b></p> <p>Added this to the list of what is included in the complaint acknowledgement.</p>
<p><b>5.7</b> - 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.</p>	<p>MTVH should update its policy to explain that when a complaint is made, the landlord will confirm their understanding of the issue, discuss what outcomes the resident wants, and make clear which parts they are responsible for and which they are not.</p>	<p><b>3.2 How we assess your complaint</b></p> <p>Added wording to address this.</p>
<p><b>5.2</b> - 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.</p>	<p>MTVH should update its complaint policy to ensure it is clear there are only two stages to the complaint process without resolving the complaint outside of the complaint process (Stage '0').</p>	<p><b>3.3 How we handle your complaint</b></p> <p>Removed references to local resolutions, as this was implying we did not log these as complaints or provide an outcome letter, which is not the case.</p> <p>(We also removed ‘Local Resolution’ from the Definitions Table in section 2 and a reference to ‘formal’ complaints.)</p>
<p><b>5.3</b> - 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.</p>		<p><b>3.3 How we handle your complaint</b></p> <p>Added additional wording to make it explicit that we will log a new complaint where additional issues are unrelated or would unreasonably delay the response.</p>
<p><b>6.8</b> - Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.</p>	<p>MTVH should update its complaint policy so it makes clear that any new issues will be logged as a new complaint if the Stage 1 response has been issued, the issues are unrelated or it would unreasonably delay the response.</p>	<p><b>3.3 How we handle your complaint</b></p> <p>Added additional wording to make it explicit that we will log a new complaint where additional issues are unrelated or would unreasonably delay the response.</p>
<p><b>6.10</b> - If all or part of the complaint is not resolved to the resident’s satisfaction at stage 1, it must be progressed to stage 2 of the landlord’s procedure. Stage 2 is the landlord’s final response.</p>	<p>MTVH should update its complaint policy so it makes clear that the landlord has a two stage process and that residents are aware of this.</p>	<p><b>3.4 Stage 2 complaints</b></p> <p>Reworded the first sentence and specified which ombudsmen require us to follow a two stage process.</p>

Code Provision & Requirement	HOS Recommendation	Changes to Policy
<p><b>6.12</b> - Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.</p>	<p>MTVH should update its complaint policy so that it is clear that residents are not required to explain their reasons for requesting a Stage 2 escalation to their complaint.</p>	<p><b>3.4 Stage 2 complaints</b></p> <p>Added wording to make this explicit and encouraging them to tell us why they are not satisfied if possible.</p>
<p><b>6.11</b> - Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.</p>	<p>MTVH should update its complaints policy to clearly explain that all complaints will be identified, acknowledged, and recorded within five working days of being received.</p>	<p><b>3.4 Stage 2 complaints</b></p> <p>Added “within 5 working days” and “Our understanding of your complaint and the outcomes you are seeking” to the list of what is included in the Stage 2 Acknowledgement.</p>
<p><b>6.13</b> - The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.</p>	<p>MTVH should update its complaint policy so that it is clear that Stage 2 complaints will be considered by someone that was not involved in the complaint at Stage 1.</p>	<p><b>3.4 Stage 2 complaints</b></p> <p>Added wording to make this explicit.</p>
<p><b>5.9</b> - Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	<p>MTVH should update its complaint policy so it makes clear that where responses (to both Stage 1 and Stage 2 complaints) fall outside the Ombudsman Code's extended timescales, the landlord will agree with the resident suitable intervals for being updated on the complaint.</p>	<p><b>3.5 Timeframes for responding to complaints</b></p> <p>Wording amended to include reference to ‘suitable intervals’.</p>
<p><b>6.5 &amp; 6.16</b> - When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	<p>MTVH should update its complaint policy so it makes clear that the landlord confirms the resident's right to approach the Housing Ombudsman Service if extension timescale exceed those stated by the Code for both Stage 1 and Stage 2 responses.</p>	<p><b>3.5 Timeframes for responding to complaints</b></p> <p>This was already provided for in the existing policy, however we have adjusted the layout to make this more prominent, including adding the words “should you wish to discuss it with them.”</p>
<p><b>2.3</b> - Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	<p>MTVH should update its policy to make it clear to residents that they can make a complaint within 12 months of the issue happening or from when they first became aware of it.</p>	<p><b>3.5 Timeframes for responding to complaints</b></p> <p>Added wording addressing this to the first bullet.</p>

Code Provision & Requirement	HOS Recommendation	Changes to Appendix
<p><b>2.3</b> - Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	<p>MTVH should update its policy to make it clear to residents that they can make a complaint within 12 months of the issue happening or from when they first became aware of it.</p>	<p><b>1. Ombudsman Contact Information</b></p> <p>Amended wording in 'Timeframe for submitting a complaint to us' column for HOS.</p>
<p>This was not a HOS recommendation but prompted by the <b>Data Use and Access Act 2025</b>, which requires us to acknowledge complaints within 30 days and provide a response 'without undue delay'. The ICO are currently working on updated complaints guidance, however this is currently in drafting stage, so not available. We have based the amended wording on the current ICO guidance and the additional requirements of the new legislation, however this may require a further update at the next review, once the ICO's updated guidance is published (expected Winter 2025/26).</p>		<p><b>3. Timeframes for acknowledging and responding to complaints</b></p> <p>Added ICO to the Single Stage Ombudsman table (and renamed Single Stage Ombudsmen/Regulators), along with their requirements around complaint response times.</p>
<p><b>6.4</b> - Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.</p>	<p>MTVH should update its complaint policy so it makes clear that Stage 1 complaint extensions must be no more than 10 working days without good reason.</p>	<p><b>3. Timeframes for acknowledging and responding to complaints</b></p> <p>Added following wording to the Two Stage Ombudsman table:</p>
<p><b>6.15</b> - Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.</p>	<p>MTVH should update its complaint policy so it makes clear that Stage 2 complaint extensions must be no more than 20 working days without good reason.</p>	<p>Where an extension is required, this will be no more than 10 [or 20] working days without good reason.</p> <p>We are unable to reflect this in the main policy as it is not in line with the TPO Complaint Handling Code, which also specifies a two stage process</p>