

Complaint handling code: Self-assessment form

ASTER GROUP

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	**Yes**	Aster follows the Housing Ombudsman's definition of a complaint. • Section 2.3, paragraph 2.3.1 in the complaints policy	The definition of a complaint is covered specifically within the training package in conjunction with the definition of a Service Request. This training is mandatory for all investigating case managers and officers. The Complaints Team, Case Officers and Contact Centre are managed and led by the same leader and there is close liaison between the teams to ensure a consistent approach.
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**	Customers do not need to use the word complaint for an issue to be recorded as such. • Section 2.3, paragraph 2.3.2 in the complaints policy • Section 2.5 covers complaints via third party and representatives • Section 2.4.6 covers petitions	The definition of a complaint is covered in Aster's mandatory complaint training, along with how to accept and progress complaints from customers. Regular training is run across teams and communication on the complaints process.

Completed by: Alan Scammell
Position: Head of Complaints and Learning
Last updated: November 2026

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**	Recognising the difference between a complaint and a service request is covered at - • Section 2.2 of the complaints policy defines a service request	All requests to record a complaint are assessed by the complaints team in line with the Housing Ombudsman's guidance. This is covered specifically in the training to ensure compliance with the Complaint Handling Code. Where an issue has been assessed as a service request the customer is contacted to discuss this. Where a customer either disagrees or remains dissatisfied with the response to their service request a complaint will be recorded. All service requests are recorded on our Dynamics case management system for complaints handling, and can be audited and reported on internally.
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**	Recognising the difference between a complaint and a service request: • Section 2.2 and 2.3 of the complaints policy	Once initially assessed by the complaints team as a service request, this is referred to the Case Officers or operational teams to contact the customer. Where a customer remains dissatisfied the response to their service request the complaints team will raise a stage 1 complaint whilst the handling of the service request remains ongoing. This process is recorded within Dynamics case management system for complaints handling.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever	**Yes**	Dissatisfaction expressed through surveys:	Any specific issues identified through survey feedback raised by a customer

Completed by: Alan Scammell
Position: Head of Complaints and Learning
Last updated: November 2026

	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.		• Section 2.3.2 and 2.3.3 of the complaints policy	are sent to the relevant service area to contact and address.



Complaint handling code: Self-assessment form

ASTER GROUP

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**	Aster and its Entities are able to report on complaints that have not been accepted. This happens occasionally if the issue is a.) more than 12 months old, b.) has already been investigated under Aster's complaints process or c.) legal action has commenced and been heard at court.	Our record management system was updated to allow us to accurately report on this during 2025/26.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • 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**	The Complaints Policy clearly defines who can make a complaint and the circumstances where a matter will not be considered as a complaint or escalated are as follows: • Enham's Commercial Trust properties • Commercial Relationships • Issues not previously reported • Service Requests	Aster's Complaints Policy is applicable to all customers who receive a service from Aster.
2.3	Landlords must accept complaints referred to them within 12 months of the	**Yes**	Aster will accept and record a complete which is referrec within 12 months of the issue occurring or the customer	An individual assessment for each case is made by the complaint officers

Completed by: Alan Scammell
Position: Head of Complaints and Learning
Last updated: November 2026

	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.		becoming aware of the issue unless a valid reason to not do so: • Section 2.4.4 of the complaints policy	with referral to the Head of Complaints and Learning or service areas where required. We capture all complaints we refuse to accept in our complaints management system.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	**Yes**	The reasons for not recording a complaint are defined: • Section 2.4.3 and 2.4.4 of the complaints policy	The Complaint Officers sitting within Aster's centralised complaints team are trained to assess all complaints in line with Aster's Policy and Procedure and to consider the individual circumstances of each complaint. Where a complaint is not recorded a full explanation is provided by the Complaints Officers together with the contact details for the Housing Ombudsman Service
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	**Yes**	As detailed in section 2.4 above	As detailed 2.4 above evidence



Complaint handling code: Self-assessment form

ASTER GROUP

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	**Yes**	Multiple routes are available to make a complaint. • Section 1.5 of the complaints policy Posters explaining, and supporting access to the complaints process, are also displayed in communal scheme areas. In addition to this, customers can make complaints via the 'My Aster Portal' which is assessed by the Contact Centre within the requirements of the Complaints Policy and Procedure. Social media enquiries are managed via the Contact Centre where customers can also report complaints via Live Chat, Instagram and Facebook Instant Messenger. Communication methods are subject of continuous review and via the digital agenda the aim is to deliver WhatsApp within the next financial year which will provide additional channels for customers to raise complaints. Customer E-shots are also sent explaining the complaints process.	Aster has an accessibility tool on its website called Recite Me. This offers a read aloud service, translation service and the option to read in large font. We consider Aster's duties under the Equality Act, • Section 2.1.1 of the complaints policy

3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	**Yes**	Customers have multiple routes to assess the complaints service as detailed in section 3.1. above. Knowledge for all staff of the complaints policy and procedure is mandatory and circulated via Aster's ELEARN platform. The centralised Complaints Team provide the point of contact for all staff to refer complaint issues.	Aster promotes a positive no blame culture towards resolving complaints. Through Aster's Modernisation Programme we are continuing to develop a positive complaints culture, assisted by the MRC.
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**	Aster values the opportunity complaints provide to review our process and where appropriate make changes to improve the services we provide. • Section 1.6 of the complaints policy	Aster is a registered restorative organisation, and we use these restorative principles in promoting a culture where complaints are considered a valuable source of learning for service improvement.
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**	There is a dedicated complaints page on Aster's web site linked to the 'Contact us' section which can also be found via the search function. This publicises the Complaint Policy, process, Complaint Handling Code and the role of the Housing Ombudsman. There are dedicated complaints pages for all of Aster's Group entities where the 2-stage complaint policy is accessible together with links to the Housing Ombudsman's web site.	A review of the accessibility of Aster complaint procedure and the process was undertaken by the Head of Complaints and Learning in line with the requirements in the Complaint Handling Code. Aster has enhanced its accessibility in 2025 with customers now able to raise a complaint via our MyAster customer portal.
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**	Detail on accessibility and reporting can be found in the Complaints Policy: • Section 1.4 is accessibility to information on the Housing Ombudsman Service	A review of the accessibility of Aster complaint procedure and the process was undertaken by the Head of Complaints and Learning in line with

			• Section 2.1.5 and 2.1.6 on how Aster analyse and report on complaints performance	the requirements in the Complaint Handling Code. Aster has enhanced its accessibility in 2025 with customers now able to raise a complaint via our MyAster customer portal.
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**	*Complaints from third parties or a representative will be dealt with in line with this policy – A third party representing a customer for a complaint may also include a solicitor.* Provision is made for 3rd party representation: • Section 2.5 of the complaints policy	This provision was specifically added to Aster's complaints policy following a determination from the Housing Ombudsman Service regarding this issue.
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**	There are dedicated complaints pages for all of Aster's Group entities, each with links to the Housing Ombudsman's web site. When a complaint is recorded an information leaflet is provided explaining the complaint process and how to access the Housing Ombudsman Service. The stage 1 and 2 letter templates highlight the role of the Housing Ombudsman Service together with contact details.	The complaints management system, Microsoft Dynamics auto generates the Housing Ombudsman leaflet when sending correspondence to a customer.



Complaint handling code: Self-assessment form

ASTER GROUP

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**	Aster has a centralised and dedicated Complaints Team with regionally aligned Complaint Officers. Their role is to receive, assess, allocate, monitor and provide support for all complaints ensuring they are dealt with in line with the complaint policy and procedure, including Liaison and communication with the Housing Ombudsman service. The complaint investigation itself is service led with nominated trained complaint investigating managers. The Complaints Officers work to dedicated regions with the investigating case managers and officers supporting them and our customers through the complaints process. There is a dedicated post of Head of Complaints and Learning responsible for performance reporting to the Senior Leadership Team and Governing Body.	The composition and strength of the centralised Complaints Team is subject to continuous review to ensure there is adequate resourcing.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	**Yes**	The Complaints Officers work to dedicated regions with the investigating case managers. They have the authority and autonomy to direct and guide the case managers and officers to ensure compliance with the complaints process, supported by the relevant Heads of Service and Regional Operational Directors. Case managers and officers are trained and have the authority and autonomy to make decisions to resolve	The Complaint Officers meet weekly with their Regional Heads of Service counterparts ensuring oversight of complaints and resolution proposals.

			complaints with access to Head of Service and Directors where required.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	**Yes**	Through Aster's Modernisation Programme we are continuing to develop a positive complaints culture, assisted by the MRC. Aster promotes a positive no blame complaints culture • Section 2.1 of the complaints policy	Complaint management is prioritised with a dedicated Complaints Team closely aligned with the Contact Centre. The investigating case managers and officers are trained in complaint management and dispute resolution, and as part of their investigation they have the responsibility to identify learning. Cases cannot be closed if this aspect has not been covered. Aster has in place a framework for all leaders to help them develop their skills. Complaint management and the promotion of a positive complaints culture forms a part of this framework.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	**Yes**	A centralised and single Complaints Policy is in place for dealing with all complaints raised.	The Complaints Policy is applicable to all Entities within the Group.

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 Policy (paragraph 2.2 and 2.3)	Aster, supported by the processes and procedures in place, encourage the early resolution of complaints and operates a two stage complaints 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 Policy (paragraph 2.6.4)	Aster operates a two stage complaints process in line with the Complaint Handling Code timescales and requirements.
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**	Aster's complaints are not handled by third parties • Complaint Policy (paragraph 2.6.1)	Complaints are managed via the internal complaints process by the dedicated Complaints Officers and investigating Case managers.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	**Yes**	Aster's complaints are not handled by third parties • Complaint Policy (paragraph 2.6.1)	Complaints are managed via the internal complaints process by the dedicated Complaints Officers and investigating Case managers.
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	**Yes**	The role of the Complaints Officer is to assess and define a complaint to enable a full understanding of the issues raised and the outcome sought by the customer. The requirement to define a complaint is detailed: • Complaints Policy (section 2.6.4)	The stage 1 and stage 2 complaint letter templates are generated by Microsoft Dynamics, as part of the complaints process, and are structured to support this approach.

	must be asked for clarification.			
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	**Yes**	• Complaint Policy (paragraph 2.6.3)	The stage 1 and stage 2 complaint letter templates are generated by Microsoft Dynamics, as part of the complaints process, and are structured to support this approach.
5.8	At each stage of the complaints process, complaint handlers must: 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**	Aster's complaint management culture is described at section 1 and 2 in the Complaint Policy. Staff investigating complaints receive dedicated complaint investigation and dispute resolution training to ensure complaints are dealt with on their own merits to support a customer to feel they have been heard and listened to. The Complaints Officers provide the oversight and necessary scrutiny to ensure a complaint investigation is balanced, fair and all evidence is fairly considered.	Aster's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout
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**	Where a response to a complaint will fall outside the timescales set out in this policy, we must agree with the customer suitable intervals for keeping them informed about their complaint. • Complaints Policy (paragraph 2.6.5)	The Complaints Officers provide oversight of all complaint responses at each stage to ensure the provisions of the code are adhered to.
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	**Yes**	Aster complies with the equality Act 2010 and has a Diversity and Inclusion Policy. Reference is made to accessibility in our Customer Principals. Diversity and Inclusion e-Learning is a mandatory learning module for all Aster staff.	Aster's information management system (CRM Dynamics) maintains a record of a customer's disabilities, vulnerabilities and any reasonable adjustments in place or required.

	well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		*We will ensure everyone is treated fairly and honestly throughout the complaints process. We will always ensure that we carry out any reasonable adjustments to the complaints process for residents that require us to do so.* • Complaints Policy (paragraph 2.1.1)	Aster's complaints process is managed via a dedicated Dynamics complaints module which captures and records a customer's vulnerability, or any reasonable adjustments required to enable a proportionate and supportive response.
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	The reason to refuse the escalation of a complaint are detailed: • Complaints Policy (paragraph 2.6.7)	The Complaints Officers provide oversight of all complaint responses at each stage and are responsible for ensuring this section of the code is adhered to.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	**Yes**	Aster's complaints process is managed via a dedicated CRM Dynamics complaints module which captures all information, correspondence, and any revenant documentation throughout the life of a complaint.	Aster's complaints process is managed via a dedicated CRM Dynamics complaints module which captures all information, correspondence, and any revenant documentation throughout the life of a complaint.
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**	Aster's approach, policy and procedure encourage early resolution of a complaint at any stage of the complaint process either by the Complaints Officers or investigating case managers whilst ensuring compliance with requirements of the complaint handling code.	The aims of Aster's complaints process are detailed in the Complaints Policy
5.14	Landlords must have policies and procedures in place for managing	**Yes**	Aster has an Unreasonable Behaviour policy. This is referred to:	Aster has an Unreasonable Behaviour policy. It's purpose is to assist with

	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.		• Complaints Policy (paragraph 2.4.7)	deciding on the next steps and who will need to be involved to ensure the guidelines are applied fairly and the customer is notified.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	**Yes**	Section 5.14 above refers.	Section 5.14 above refers.



Complaint handling code: Self-assessment form

ASTER GROUP

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**	The complaint officers role is to receive, assess, allocate, monitor and provide support for all complaints ensuring they are dealt with in line with the complaint procedure and the Equality Act 2010. Each complaint is individually assessed on the information provided by the customer to enable a proportionate balanced and timely approach. The Complaints Team work closely and are aligned within the same directorate as the Contact Centre enabling a consistent and customer supportive approach.	This is covered both as part of training for the complaints team
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 Policy (paragraph 2.6.3)	All complaints are managed via Microsoft Dynamics with a specifically designated complaints module. This module is designed to record and track complaints through the entire complaints process including Learning and resolutions offered to ensure compliance with the provisions of the Complaint Handling Code. The Complaints Officers are responsible for ensuring compliance with these timescales.

Completed by: Alan Scammell
Position: Head of Complaints and Learning
Last updated: November 2026

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	**Yes**	• Complaints Policy (paragraph 2.6.4)	As detailed in section 6.2 above and performance is detailed in the Annual Report on the Aster website.
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 Policy (paragraph 2.6.4)	Aster's performance is detailed in the Annual report on Asters website. This has been an area requiring further improvement and the introduction of the dedicated case officer has had a really positive impact on complaint extensions at stage 1. Further work is ongoing to improve extension rates at stage 2.
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 Policy (paragraph 2.6.4)	Contact details for the Housing Ombudsman are included in the extension letter templates (contained and generated by Dynamics complaints module) to ensure all the required information is provided in a timely manner.
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	**Yes**	Responses are sent with the proposed actions and undertakings, (not when the outstanding actions have been completed) within the Complaint Handling Code response timescales. Completion of these actions are monitored via commitments in CRM Dynamics to ensure they are completed and closed on Aster's	All responses are owned by the case manager or officer and overseen by the Complaints Officers to ensure all the issues within the complaint definition have been addressed and have been entered onto Dynamics

	promptly with appropriate updates provided to the resident.		management information systems.	complaints module and tracked via commitments in CRM Dynamic. This is also linked to Aster's property maintenance system to support tracking and completion of undertakings proposed at stage 1 and 2.
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**	The response template covers the requirements for the response to customers.	The complaint template letters were subject to a full review by the dedicated complaints panel in 2025/26 and recommended changes made.
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**	The Complaints Officers maintain oversight of the complaint and provide guidance and advice to investigating case managers where additional issue are raised to enable compliance with the complaint handling code. • Complaints Policy (paragraph 2.6.4)	Training input has been provided to the Complaints Officers including feedback on this section from the Housing Ombudsman following determinations covering this section.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stages. b. the complaint definition. c. the decision on the complaint.	**Yes**	All required information is contained in the stage 1 template held within the Microsoft Dynamics case module. All case managers letters are reviewed by the Complaints Officers prior to being sent to the customer to ensure compliance.	The complaint template letters were subject to a full review by the designated complaints panel in 25/26 to ensure compliance.

	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.			

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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**	There *are two stages to our formal complaints process each with clear time scales*: • Complaints Policy (paragraph 2.6.4)	Aster operates a two stage complaint process. The Complaints Team provide the central resource in the escalation process and communication with the customer.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint procedure within five working days of the escalation request being received.	**Yes**	• Complaints Policy (paragraph 2.6.4)	All complaints are actively managed by the Complaints Officers via the Microsoft Dynamics Case Module where the required timelines are visible and monitored. Performance measures are captured in Aster annual report on the website.

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 (paragraph 2.6.7)	Complaints Officers and Case Managers are fully aware that customers are not required to give a reason for requesting an escalation to stage 2. This is covered in the mandatory training.
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 Policy (paragraph 2.6.4)	Specifically detailed in paragraph 1.30 of the Complaints Procedure
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	**Yes**	• Complaints Policy (paragraph 2.6.4)	All complaints are actively managed by the Complaints Officers via the Microsoft Dynamics Case Module where the required timelines are visible 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**	• Complaints Policy (paragraph 2.6.4).	All complaints are managed via the Microsoft Dynamics Case Module with a specifically designated complaints module. The Complaints Officers support the case managers and are responsible for ensuring compliance with these timescales and providing a clear explanation to 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**	• Complaints Policy (paragraph 2.6.4)	All extension template letters are automatically generated via the Microsoft Dynamics Case Module and contain the contact details for the Housing Ombudsman service to comply with this section

				of the code.
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**	The internal complaints process ensures that letters are sent following investigation and when the response is known. Any outstanding actions are logged as commitments and tracked and reported internally.	The stage 1 and 2 template letters set out these requirements in addition to the training provided for case managers. Microsoft Dynamics captures all commitments agreed within the complaint resolution to ensure they are tracked and concluded.
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**	The stage 1 and 2 template letters set out these requirements in addition to the training provided for case managers. The Microsoft Dynamics Case Module captures all commitments to ensure they are tracked and concluded.	The complaint template letters were subject to a full review in 25/26
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: 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 the Ombudsman Service if the individual remains dissatisfied.	**Yes**	All required information is contained in the stage 2 template held within the Microsoft Dynamics Case Module. All case managers letters are reviewed by the Complaints Officers prior to being sent to the customer to ensure compliance.	The complaint template letters were subject to a full review in 25/26

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	**Yes**	There are two stages to our formal complaints process, each with clear time scales. • Complaints Policy (paragraph 2.6.4)	Stage 2 complaints are dealt with by an independent leader and they have the authority and scope to fully review the stage 1 and propose appropriate changes and remedies as needed.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: • 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.	**Yes**	All case managers are trained in the principles of Dispute Resolution and these points are specifically covered in the training utilising the Housing Ombudsman training module. The stage 1 and 2 template letter format also ensures these points to be covered.	All responses are overseen by the Complaints Officers to ensure this code requirement is covered.

	• Providing a financial remedy. • Changing policies, procedures or practices.			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	**Yes**	All case managers are trained in the principles of Dispute Resolution and these points are specifically covered in the training. The response templates specifically cover this issue: *Ensure that you have fully considered any vulnerabilities; including what's recorded for the customer and vulnerabilities the customer has declared in this complaint/ investigation. Please consider how this may have impacted them from the concerns raised.*	All responses are overseen by the Complaints Officers to ensure this code requirement is covered.
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 covered in the training and template letters. Microsoft Dynamics captures all undertakings to ensure they are tracked and concluded.	Microsoft Dynamics is linked to Aster's property maintenance system to support tracking and completion of commitments made as a resolution to a complaint outcome at stage 1 and 2.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	**Yes**	The information and guidance concerning appropriate remedies was taken into account when designing the new complaint training package and is specifically covered in the training delivery.	New information from the Housing Ombudsman Service is regularly reviewed by the Head of Complaints and Learning and incorporated into process, policy and procedure and training where needed.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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**	An annual report will be produced to cover all the issues required in this section. This report will be presented to the Customer Voice Committee for ratification and for the information of the Overlap Boards with oversight provided by the Member Responsible for Complaints. The report, the governing bodies response and the self-assessment will be published on the website.	An annual report will be produced to cover all the issues required in this section. This report will be presented to the Customer Voice Committee for ratification and for the information of the Overlap Boards with oversight provided by the Member Responsible for Complaints. The report, the governing bodies response and the self-assessment will be published on the website. Aster reports on complaints that we refuse to accept.

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**	As at section 8.1 above.	As at section 8.1 above.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	**Yes**	• Complaints Policy (paragraph 3.4)	This is in the Complaints Policy to ensure compliance with the Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	**Yes**	• Complaints Policy (paragraph 3.5)	This is in the Complaints Policy to ensure compliance 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**	• Complaints Policy (paragraph 3.6)	This is in the Complaints Policy to ensure compliance with the Code.



Complaint handling code: Self-assessment form

ASTER GROUP

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**	Learning is captured as an integral part of the complaints process. Every complaint in the Microsoft Dynamics Case Module must include a learning outcome which can be extracted to identify themes. This then feeds into our learning log which is shared with the business and publicised to our customers. A refreshed training package to emphasise the importance of complaint learning has been completed. This is mandatory training for all staff involved in the investigation of formal complaints with an agreed programme for continuous re-fresher training sessions for case managers. Restorative Practice sessions have been introduced with a full customer service focus. Every adverse finding from the Housing Ombudsman Service is assessed by the Head of Complaints and Learning and circulated to the senior leadership team. Where required these are subject to a full learning review.	Aster is a registered Restorative Organisation; this means we meet the standards of the Restorative Justice Council for applying restorative practice throughout our organisation. We use these restorative principles in complaint resolution to build positive relationships with our customers and within our communities. Themes and trends are reported through strategic and operational learning logs to identify learning and drive service improvement. Examples of these learning can be found in the Annual report on Asters website.
9.2	A positive complaint handling culture is integral to the effectiveness with	**Yes**	As part of the work and drive to developing positive complaints culture,	A significant amount of work has been undertaken around developing and

	which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		a number of themes and workstreams have been undertaken including - We hold regular restorative practice sessions with colleagues and involved customers to support a positive complaints culture and service. The development of refreshed training and learning on complaints management, with an agreed programme for continuous re-fresher training sessions for case managers. E-learning for all colleagues around our complaints focus, our concentration on learning and the role each colleague can make to that. To include complaints learning into induction checklist for new starters. Further human centred training to colleagues through a Tone of Voice approach The development of a framework to collate and disseminate learning themes obtained from data and learning from the Housing Ombudsman to measure performance. This framework is to include feedback mechanisms to residents, colleagues, and scrutiny panels. In addition to this every complaint in the Microsoft Dynamics Case Module must include a learning outcome which can be extracted to identify themes. This then feeds into our learning log which is shared with the business and publicised to our customers.	maintaining a positive complaints culture at Aster. This has included audits of the complaints process. The aim is to ensure high and consistent levels of customer engagement to ensure that addressing and learning from complaints is the responsibility of all colleagues.

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**	Complaint learning is publicised with the Annual Customer Report. Complaint performance and learning is reported quarterly to customer panels and internally to colleagues. Members of the Complaints Team are attending regular operational meeting to discuss learning and outcomes.	Everyone in Aster Group is responsible for the service we deliver and when something goes wrong the way we respond to a complaint will reflect our values. We value the opportunities complaints provide us to review our processes and, where appropriate, to make any changes needed to improve the way we deliver our services.
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**	This is the role and responsibility of Head of Complaints and Learning, reporting into the Assistant Director Customer Experience.	Aster has dedicated centralised Complaints Team managed by a Head of Service who is accountable for complaint handling.
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**	Aster Group has a non-executive director Mehul Desai appointed as the MRC.	The MRC has quarterly meetings with the Head of Complaints and learning, where they consider current performance, trends and learning. They also act as a critical friend to relevant colleagues for especially complex or challenging complaints.
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	**Yes**	There is an information matrix which outlines the data and insight provided to the MRC on a regular basis.	The appointment of a non-executive director as the MRC, provides a significant opportunity in the continued development of a

	handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.		The Customer Voice Committee receives a quarterly complaints report. The MRC actively reviews samples of complaints to capture learning and identify challenges to have oversight of performance and culture.	positive complaints culture and improving Aster's service delivery through complaint learning.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling. c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	**Yes**	There are clear lines of responsibility (a delegation matrix) detailing reporting lines, accountability and responsibly to monitor Aster's performance and provide assurance. Senior Leaderships Teams report and provide assurance to the Executive Board, the Customer Voice Committee and the Overlap Boards. Involved customer groups monitor performance and the Customer Voice Committee assess an annual complaint report for assurance to the Overlap Boards.	There are clear lines of responsibility to ensure there is robust oversight of all elements of the complaint service provided by Aster.

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: 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.	**No**	Within objective setting guidelines leaders are required to set objectives relating to complaints, effectively managing complaints and promoting a positive complaint and learning culture.	The objective is to ensure high and consistent levels of customer engagement to ensure that addressing and learning from complaints is the responsibility of all colleagues. Whilst leaders are able to check this for their direct reports, wider reporting for assurance is not currently reportable through our Appraisal platform.

Aster Group is our overarching company brand name and comprises the following companies and charitable entities:
Aster Group Limited, **East Boro Housing Trust Limited, Central** and **Cecil Housing Trust, Aster 3 Limited**, **Aster Living**, **Aster Communities**, **Synergy Housing Limited** and **Enham Trust**.