Self-assessment form

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 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.'*	Y	• Defined in our Complaints Policy • (Section 2.1) and procedure • Defined on our website • Reinforced in staff training programme and training document provided to all staff.	• We use the Code definition consistently across the organisation and treat any expression of dissatisfaction as a complaint where the resident wishes to pursue it. • Complaints are recorded on our housing management system (MRI) and discussed at contractor/managing agent meetings to ensure actions and learning are captured and tracked.
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.	Y	• Staff training at away day. • Various methods available to report a concern, including contact us • Complaint handling is included in the contractor tender document along with expectations and response timescale	• Staff are trained to recognise dissatisfaction regardless of the wording used (e.g., concerns raised by email, phone or in person) and to offer the option to log a formal complaint. • Where a complaint is raised by a representative/third party, we handle this in line with the policy, confirming communication preferences and any authority/consent where appropriate.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	Y	• Complaints Policy (Section 2.1 and 2.2)	• The policy distinguishes service requests from complaints and staff

	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.		• Reinforced in staff training programme and training document provided to all staff. • Information on our website • An agenda items on all team meetings to look at trends • Quarterly reports are presented to Board and available on the website	are reminded to record both appropriately. • Service requests are monitored through monthly reports to operational teams, reviewed for trends at team/contractor meetings, and escalated to a complaint if dissatisfaction remains.
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.	Y	• Complaint Policy (Section 2.3) • Staff training programme and training document provided to all staff included identifying, and actioning service requests. • Monitoring of service requests and handling is carried out by operational managers	• Complaints are a standing agenda item for all contractor/managing agent meeting and are logged on our system. • If a resident is unhappy with how a service request has been handled, we log a complaint even if works/actions are still ongoing. • Service delivery continues alongside the complaint investigation, with clear tracking of outstanding actions and updates to the resident.
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.	Y	• At the end of each survey, we conduct the customer has a link to log a complaint • Following the TSM survey, using a RAG rating we followed up on all contacts	• Surveys include clear signposting on how to complain (e.g., a link or instructions at the end of the survey). • Where survey feedback indicates dissatisfaction and the resident wishes to be contacted, we follow up to explain the complaints route and offer support to log a complaint.

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	Y	• Complaints Policy (Section 3) • Template letter for not accepting complaint is a guidance to ensure there is a valid reason • Quarterly reports to Board include complaints that have not been accepted.	• We take a 'default accept' approach and only decline where there is a valid, evidenced reason in line with the policy. • Decisions not to accept are documented (including rationale) and reported through quarterly Board reporting for transparency and oversight.
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.	Y	• Complaints Policy (Section 3) • Template letter signposts customer to the Housing Ombudsman if they disagree • Quarterly reports to Board include complaints that have not been accepted. • Triaging of complaint	• Exclusions are set out in the policy and are applied fairly and reasonably, with clear explanation to the resident. • Where exclusions are applied, residents are signposted to the Housing Ombudsman Service if they disagree, and equality impacts are considered via the Equality Impact Assessment (EIA).

	• Matters that have previously been considered under the complaints 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.	Y	• Complaints Policy (Section 3.2) • Quarterly reports to Board include complaints that have not been accepted	• Each complaint is triaged, and discretion applied regarding time limit accepted. • Complaints within 12 months are accepted unless another valid exclusion applies; we also consider discretion where there are good reasons for delay. • The triage process records the factors considered (e.g., vulnerability, ongoing issues, barriers to complaining) to support consistent, fair decision making.
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.	Y	• Complaints Policy (Section 3) • Template letter signposts customer to the Housing Ombudsman if they disagree. • Quarterly reports to Board include complaints that have not been accepted.	• Where we do not accept a complaint, we provide a clear written explanation, referencing the policy grounds for exclusion. • Our template letters ensure we include the resident's right to refer the decision to 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.	Y	• Complaints Policy (Section 3) • Triaging of complaint	• We avoid blanket exclusions and assess each case on its individual circumstances. • We consider disability/vulnerability and any reasonable adjustments when deciding how best to

				progress the matter and what support may be needed.

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.	Y	• Complaints Policy (Section 5 and 10) • Complaints Policy Equality Impact Assessment • MRI hold information on disability and vulnerability which is taken into consideration at each touchpoint. • Complaint form includes preferred method of communication • Complaint triage assessing vulnerability	• Residents can complain through multiple channels and with any member of staff, and we anticipate reasonable adjustments under the Equality Act 2010. • Adjustments may include preferred communication method, additional time/support to engage, or providing information in alternative formats; these are recorded on MRI and reviewed as needed.
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.	Y	• Complaints Policy (Section 1 and 4) • Reinforced in staff training programme and training document provided to all staff • Promote contact methods in newsletters and on website	• All staff are trained on how to recognise and route complaints promptly for logging and acknowledgement. • Guidance is reinforced through the training programme and supporting documents so complaints can be raised with any staff member and actioned without delay.

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.	Y	• Reinforced in staff training to identify dissatisfaction and know how to act and log these • All staff are trained to log service requests • Complaints reports are produced quarterly for Board and publicised on the website.	• We actively encourage feedback and treat complaints as intelligence for improvement rather than a negative indicator. • Complaint volumes and themes are reviewed through regular reporting and meetings, and we promote how to complain via the website and resident communications.
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.	Y	• Complaints Policy and process is available on the website and link provided in quarterly newsletters and Facebook. • Complaints process and form incorporated residents' feedback • Complaint intelligent form available on myhomeonline	• The complaints policy is available in a clear, accessible format and explains the two-stage process, what happens at each stage, and response timeframes. • We also share the process through acknowledgement and response letters/emails and involve residents when reviewing the policy to ensure clarity and accessibility.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	• Complaints Policy (Section 8) • Website	• Dedicated webpage for complaints with links to the Housing Ombudsman • We publicise the complaints policy and the HOS role via our dedicated complaints webpage and links in resident communications. • Our letters and templates include information about the HOS and how to access the Code where relevant.

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.	Y	• Complaints Policy (Section 4.5) • MRI system processes complaints from a third party	• If no authority to disclose, consent is required from the residents to have a representative act on their behalf, and this is supported. • We confirm practical arrangements (including any reasonable adjustments) so the resident can participate fully in the process.
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.	Y	• Complaints Policy (Section 6.7) • On the website with link to the HOS • The complaints process • Acknowledgement letters • Stage 1 and 2 letters	• We routinely signpost residents to the Housing Ombudsman Service at the appropriate points • Contact details and the route to escalate are included in all acknowledgement/response templates and are also available on the website.

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.	Y	• The Customer and Business Support Manager take responsibility for the overall complaint handling process. • The CSBM response to Stage 1 complaints and HOS requests • The Company Secretary response to Stage 2 complaints. • Complaints are reported to Board quarterly	• The Customer and Business Support Manager acts as the complaints officer, coordinating complaint handling and acting as the liaison point with the Housing Ombudsman Service. • This role includes ensuring robust recording, reporting to the governing body, and driving

				learning and service improvements. • The Company Secretary acts as the complaints officer, coordinating stage 2 complaint handling.
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.	Y	• The Customer and Business Support Manager is the complaints officer and sits within the management structure for the organisation and attends Managers meeting and Board meetings.	• The complaints officer has access to managers and operational staff to obtain evidence, agree remedies, and resolve issues promptly. • The role has sufficient authority to escalate risks/themes, ensure actions are completed, and report performance and learning through management and Board structures.
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	Y	• Training was undertaken at the away day, which included complaint handling, responsibility and learnings. • Lessons learned tracking spreadsheet which feeds into the master action plan and monitored at managers meetings • The organisational culture is included in the customer experience strategy	• Complaint handling is prioritised as a core service, supported by organisation-wide training and a culture of learning. • Lessons learned are captured and tracked through department action logs and the Master Action Plan, with regular operational meetings to review progress and prevent recurrence.

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.	Y	• Complaint Policy • Unconscious Bias mandatory training. • Equality Impact Assessment	• We operate a single complaints policy aligned to the Code, supported by an Equality Impact Assessment to ensure fair and consistent treatment. • The policy applies irrespective of who delivers the service (including third parties acting on our behalf).
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.	Y	• Staff are trained to resolve service requests as the earlier opportunity, to log and learn from them. • This is covered in the away day training • Service request reporting and monitoring	• Service request reports are distributed to each team monthly and evaluated at their team meetings (Agenda item and minutes) • Service requests are also reviewed at contractors' meetings • We focus on early resolution through effective handling of service requests and clear signposting to the formal two-stage process where dissatisfaction remains. • We do not use additional stages (e.g., 'informal' or 'stage 0') to avoid confusion and delay; staff

				are trained to offer the choice to complain at the point dissatisfaction is expressed.
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.	Y	• Complaints Policy • We operate a two-stage process	• We operate a two-stage complaints process only, ensuring residents can reach the HOS without undue delay. • This is set out clearly in the policy and reflected in our templates and staff training.
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.	Y	• Customer are directed to complaint to the landlord not a third party. • Complaint handling is included in the tender document along with expectations and response timescale.	• Complaints is a standing agenda item on team meeting, contractor meetings, and builder/managing agents meeting • Future tenders will include the Code timescales. • Where third parties are involved, complaints remain within our two-stage process and residents are directed to the landlord rather than separate complaint routes. • Tender/contract documentation sets expectations for complaint handling and cooperation to meet Code standards and timescales.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	• Customer are directed to complaint to the landlord not a third party.	• We monitor third-party complaint handling through performance/contractor

			• Complaint handling is included in the tender document along with expectations and response timescale. • Complaints received directed by the third party or to the association are discussed at performance meetings, including timescale of responses.	meetings and address any issues promptly. • Actions and learning from complaints involving third parties are recorded, minuted and tracked, with tender documentation updated to reflect Code timescales.
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.	Y	• Complaints received are triaged • The understanding of the complaint and resolution requested forms part of the template acknowledgement letters/emails and Stage 1 and 2 responses	• At acknowledgement, we set out the ‘complaint definition’ (our understanding of the issues and the outcomes sought) and check clarity with the resident. • If clarification is needed, we contact the resident promptly, so the investigation focuses on what matters most to them.
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.	Y	• Complaints received are triaged to ascertain what we are and are not responsible for. • This forms part of the template letters/emails and an explanation provided on aspects not covered in the complaint.	• Acknowledgements and responses explain what we are responsible for, and what falls outside our remit, to manage expectations from the outset. • If responsibility becomes clearer during investigation, this is explained in the stage response with reasons and any appropriate signposting.

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.	Y	• Investigation document completed with operational team • If necessary, as part of the triage the resident is contacted to discuss complaint/any disabilities/vulnerabilities specific to this complaint we need to be aware of. • Documentation/Chronology and emails are reviewed, collated and stored on SharePoint • Complaint handlers have access to the HOS learning hub and attends webinars/podcasts • Access to MRI (housing system including CRM); telephony system (recordings) and repair system	• Investigations are carried out objectively using an investigation document/chronology, reviewing relevant records, emails and supporting evidence. • We take steps to manage conflicts of interest (e.g., appropriate separation of roles where needed) and ensure the resident has a fair opportunity to provide information.
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.	Y	• This is included in the Complaints Policy and reported to Board.	• Where responses may exceed Code timescales, we agree update intervals with the resident and record this, keeping them informed until a full response is issued.

				• Weekly internal catchups between the complaint handler and relevant department lead support timely updates and delivery.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Y	• Recording mechanisms in place for disability/vulnerability on our housing system (MRI) which is taken into consideration at each touchpoint. • Disability and vulnerability are considered when triaging the complaint to establish if any support needs/communication preferences are required and to determine if a visit would be beneficial • These are logged on the investigation form • All staff are trained on safeguarding concerns.	• We consider reasonable adjustments at triage and throughout the case, recording agreed adjustments and disclosed disability/vulnerability information on MRI and the investigation form. • Adjustments are kept under review, and safeguarding awareness is reinforced through staff training.
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.	Y	• Complaints Policy (Section 3) • Complaints received are triaged to ascertain what we are and are not responsible for. • Any refusals are explained, documented and reported to Board.	• Residents can progress through all stages unless there is a valid, evidenced reason to refuse escalation consistent with the exclusions section. • Any refusal is explained clearly and includes Ombudsman

				signposting so residents can challenge the decision.
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.	Y	• Complaints are logged on our housing system (MRI) • Documentation is recorded on SharePoint. • Key dates are recorded on Feedback Manager (MRI) • Tracking spreadsheet with dates and updates is used • Chronology of all contacts is recorded.	• We maintain a full complaint record including dates received, correspondence, evidence (e.g., photos/reports where relevant) and outcomes at each stage. • Records are held on MRI/Feedback Manager with supporting documents stored on SharePoint, enabling audit trails and effective reporting.
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.	Y	• The Association's Compensation Policy refers • Residents were consulted as part of the compensation policy review	• We can resolve and remedy complaints at any stage, including apologies, explanations, corrective actions and compensation in line with the Compensation Policy. • Remedies and actions are logged on tracking spreadsheets/action logs and monitored to completion without requiring escalation.
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.	Y	• The Association's Acceptable Behaviour Policy refers	• We have procedures for managing unacceptable behaviour, with decisions evidenced and restrictions reviewed regularly. • This ensures staff safety while maintaining fair access to

				services and complaint resolution.
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.	Y	• The Association's Acceptable Behaviour Policy refers • Equality Impact Assessment	• Any contact restrictions are proportionate, time-limited where appropriate, and consider Equality Act duties and the resident's circumstances. • We document rationale and review dates to ensure restrictions remain necessary and appropriate.

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.	Y	• Complaints process refers to the service request and formal process, and they are triaged to the most appropriate route. If it is of a complex nature and couldn't be resolved within the 3 days SLA, then it would be logged as a formal complaint. • Performance on handling of complaints is included in Board reports	• Complaints are triaged with operational teams to determine complexity, risk, and any vulnerability factors, and to decide whether a prompt resolution or fuller investigation is required. • Where suitable, stage 1 outcomes may include an apology, clear explanation and/or immediate service recovery actions, with performance

				monitored through Board reporting.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure **within five working days of the complaint being received**.	Y	• Complaints Policy (Section 6.5.2) • Performance provided in Board Reports	• We acknowledge, define and log stage 1 complaints within Code timescales (with an internal target aligned to our customer promises). • Templates ensure we confirm the complaint definition and the outcomes sought, and that records are created on the system on receipt.
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Y	• Complaints Policy (Section 6.5.3) • Performance provided in Board Reports	• Stage 1 responses are issued within 10 working days of acknowledgement, with internal tracking to monitor due dates and prompt escalation where risk is identified. • Where actions are required, responsibilities and timescales are captured so delivery can be monitored.
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.	Y	• Complaints Policy (6.5.5 refers) • Performance provided in Board Reports	• We only extend timescales were justified by complexity or evidence-gathering needs, and we explain reasons and the new response date clearly to the resident. • Extensions are recorded for reporting and oversight and are

				kept within Code limits unless there is a good reason.
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.	Y	• Complaints Policy (Section 6.5.1) • Extension Letter template includes referral to the HOS	• Extension communications include Housing Ombudsman Service contact details, as required by the Code. • Our extension templates provide consistent signposting and transparency.
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.	Y	• Complaints Policy (Section 6.5.4) • Responses are provided in accordance with the timescales. • Outstanding actions are listed clearly in the template response • Actions are logged on a departmental action log and monitored at team meetings	• We respond when the complaint decision is known, even if some remedial actions are still in progress, to avoid unnecessary delay. • Outstanding actions are listed with timescales and tracked through action logs/departmental monitoring with updates provided to the resident.
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.	Y	• Stage 1 and 2 Letter template provide a check list along with using the internal form for investigating complaints, which identifies the different elements of the complaint.	• Responses address all points in the complaint definition, explain decisions, and reference relevant policies and good practice where appropriate.
6.8	Where residents raise additional complaints during the investigation, these must be	Y	• Complaints Policy (Section 6.5.5)	

	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.			• Where additional issues are raised during investigation, we discuss with the resident whether they are related and can be incorporated without delaying the response. • Unrelated issues or those that would unreasonably delay the response are logged as a service request or new complaint and handled under the policy.
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 stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Y	• Stage 1 and 2 Letter template ensure the required information is included. • Compensation policy	• Stage 1 responses clearly confirm the stage, complaint definition, decision and reasons, remedies offered, outstanding actions, and how to escalate. • We use plain language and structure to ensure residents can understand outcomes and next steps.

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.	Y	• Complaints Policy (Section 6.6.1) • Complaints process	• Where a resident remains dissatisfied at stage 1, we progress the complaint to stage 2 as the final response stage.

				• Stage 2 considers outstanding issues, any new evidence provided, and whether the remedy/action plan remains appropriate.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Y	• Complaints Policy (Section 6.6.3) • Complaints Report to Board • Letter templates	• Stage 2 requests are acknowledged, defined and logged within 5 working days, with an internal target of 3 days which aligned to our customer promises. • Acknowledgements confirm the issues for review and invite any additional supporting information (without requiring reasons for escalation).
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.	Y	• Stage 1 letter template relates.	• Residents are not required to justify escalation; however, we make reasonable efforts to understand continuing dissatisfaction to ensure the stage 2 response is meaningful. • We provide the opportunity to share further evidence or desired outcomes to support a fair review.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	• Complaints Policy (Section 6.6.3)	• Independence is ensured by separating stage 1 and stage 2 decision makers; the MRC chairs

			• The MRC Chairs the Stage 2 review along with an independent Manager	stage 2 reviews alongside an independent manager. • Stage 2 reviews consider the full file, including chronology, evidence, and whether remedies/actions appropriately reflect impact.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Y	• Complaints Policy (Section 6.6.5) • Letter template • Complaint tracker and MRI Feedback manager reminders	• Stage 2 final responses are issued within 20 working days of acknowledgement, supported by tracking spreadsheet, MRI and diary management. • Where multiple departments are involved, timelines and responsibilities are agreed at the review meeting.
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.	Y	• Complaints Policy (Section 6.6.6) • Performance provided in Board Reports	• Extensions at stage 2 are only used where necessary, with clear reasons and revised timescales communicated to the resident. • Any extension is kept within Code limits unless there is a good reason, and progress is monitored through internal oversight.
6.16	When an organisation informs a resident about an extension to these timescales, they	Y	• Complaints Policy (Section 6.6.6) and procedure.	

	must be provided with the contact details of the Ombudsman.		• Extension Letter template includes referral to the HOS • Website includes referral to the HOS	• Stage 2 extension letters include Housing Ombudsman Service contact details. • Templates ensure consistent signposting and transparency.
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.	Y	• Complaints Policy (Section 6.5.4) • Responses are provided in accordance with the timescales. • Outstanding actions are listed clearly in the template response • Actions are logged on a departmental action log and monitored at team meetings	• We respond when the complaint decision is known, even if some remedial actions are still in progress, to avoid unnecessary delay. • Outstanding actions are listed with timescales and tracked through action logs/departmental monitoring with updates provided to the resident.
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.	Y	• Stage 1 and 2 Letter template provide a check list along with using the internal form for investigating complaints.	• Stage 2 responses address every point in the complaint definition and provide clear reasons for decisions, referencing relevant policies, law and good practice where appropriate. • The stage 2 checklist and investigation documentation support a comprehensive, evidence-based final response.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Y	• Stage 1 and 2 Letter template ensure the required information is included.	• Stage 1 responses clearly confirm the stage, complaint

	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.		Compensation policy	definition, decision and reasons, remedies offered, outstanding actions, and how to escalate. • We use plain language and structure to ensure residents can understand outcomes and next steps.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	• The MRC Chairs the Stage 2 review along with an independent Manager. Relevant staff are included to answer questions if necessary and this is documented in the meeting minutes	• Stage 2 reviews involve relevant staff needed to provide a full, final response (e.g., operational leads for the service area) and this is documented. • This ensures responses are accurate, actions are deliverable, and accountability is clear.

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; • Providing a financial remedy; • Changing policies, procedures or practices.	Y	• Stage 1 and 2 Letter template ensure this information is included. • Compensation policy provides guidance for a suitable remedy • Compensation spreadsheet • Lessons learned tracker • You said we did on website	• All staff are aware of the compensation policy, which includes all remedies • Where we identify a service failure, responses acknowledge what went wrong and set out corrective actions already taken and/or planned to put things right. • Remedies may include apologies, explanations, service recovery actions, record corrections, and financial redress in line with the Compensation Policy.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	• Compensation policy • Template letters • HOS Compensation guidance document	• All staff are aware of the compensation policy, which includes all remedies • Remedies are proportionate to the impact experienced by the resident and consider duration, severity, inconvenience and any distress.

				• Complaint handlers use the Compensation Policy guidance to support consistent, fair outcomes.
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.	Y	• Stage 1 and 2 Letter template ensure this information is included. • Complaint actions are monitored on a spreadsheet, and satisfaction survey is carried out when all actions are completed, or compensation has been awarded as agreed.	• Remedy offers clearly state what will happen and by when; where appropriate, we agree arrangements with the resident. • Completion is monitored through tracking spreadsheets/action logs, and satisfaction feedback is sought once actions/compensation are completed or agreed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	• Compensation policy • Refer to the HOS learning hub; spotlight reports; • HOS compensation guidance	• Residents were consulted as part of the compensation policy review. • We consider Housing Ombudsman guidance on compensation and use the learning hub resources and spotlight reports when reviewing remedies and our approach.

Section 8: Self-assessment, reporting and compliance

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.	Y	• Quarterly Board Reports (including complaints refused) • Annual Board Report which includes all requirements • Links to Website reports • Dedicated webpage for complaints • You said we did webpage • Headline figures and lessons learned in newsletter and annual report	• HOS Spotlight reviews are being considered with all new policy/procedure review. • We also review Ombudsman publications (including spotlight reports) and incorporate relevant learning into service improvement planning.
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.	Y	• Quarterly Board Reports • Annual Board Reports • Links to Website reports • Dedicated webpage for complaints performance and compliance, including the	• The annual complaints performance and service improvement report is presented to the Board. Following approval, all relevant documents and

			statement from the Governing body.	performance are published on the complaints section of our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	• No restructure/change	• We would complete an additional self-assessment following any significant restructure/merger/procedure change to ensure continued Code compliance. • Where changes occur, templates, training and reporting would be updated and the governing body informed.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	• No Housing Ombudsman investigation	• If requested following an Ombudsman investigation, we would review and update the self-assessment and action plan in line with findings and orders. • Progress against any required improvements would be tracked and reported through governance arrangements.
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	Y	• No exceptional circumstances	• If exceptional circumstances affected compliance (e.g., a cyber incident), we would notify the HOS, inform residents of impacts, and

	a timescale for returning to compliance with the Code.			publish information on our website. • We would set and publish a clear timescale for returning to compliance and provide interim measures to maintain access to the complaints process.

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.	Y	• Two stage approach to lessons learned: • Quick wins – Dept Action Plan • Policy/process/project actions are added to the organisation action plan which is monitored monthly at Managers meetings. • Policy/procedural reviews including spotlight reports • Trend analysis reporting	• Learning is captured beyond the individual case through operational biweekly reviews and wider themes recorded on the Master Action Plan. • This supports both 'quick win' improvements and longer-term policy/process changes, with progress monitored through management oversight.
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.	Y	• Customer experience strategy • Customer experience/complaints training at away day	• Operational complaints meetings are biweekly which include operational lessons learned. Strategy lessons learned are monitored via the Master

				Action Plan monthly by operational managers • Complaints are reviewed at team meetings and contractor meetings. • Conducting outbound calls asking about satisfaction with the complaints process.
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.	Y	• Quarterly complaints reports are published on website • Annual complaints report is published on website • "You said we did" on website; Included in the resident's newsletter. • Quarterly and annual complaint Board reports • Published in residents' newsletters	• We report learning and improvements back to residents and stakeholders through published quarterly/annual reports, newsletters and 'You said, we did' updates. • Internally, learning is shared through team meetings and contractor/managing agent meetings so service delivery can improve.
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.	Y	• The Customer & Business Support Manager • Quarterly reports for formal complaints • Monthly trend reports are provided to teams for service requests	• A senior lead (Customer & Business Support Manager) is accountable for complaints, monitoring themes/trends and identifying systemic risks. • Formal complaint performance is reported quarterly, and service

				request trend reports are shared monthly with operational teams for prevention-focused improvements.
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').	Y	• The Company Secretary (Complaints policy 8.2) • The MRC is the Chair for all Stage 2 reviews	• A Member Responsible for Complaints (MRC) is appointed and provides leadership on complaint handling culture. • The MRC chairs stage 2 reviews, supporting robust challenge and independent oversight.
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.	Y	The MRC ensures the following are produced and distributed: - • Quarterly Board Reports • Annual Board Reports • Quarterly complaints reports are published on website • Annual complaints report is published on website • "You said we did" on website; Included in the resident's newsletter.	• The MRC receives and reviews complaint performance information and has access to appropriate staff and reporting to fulfil the role effectively. • This supports scrutiny, identification of themes, and assurance that learning and actions are being progressed.
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;	Y	The governing body receives the following, which include all the details stated in the Code: - • Quarterly Board Reports	• The governing body receives regular updates on complaint volumes,

	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.		• Annual Board Reports • Quarterly complaints reports are published on website • Annual complaints report is published on website • "You said we did" on website; Included in the resident's newsletter.	categories, outcomes and timescale performance. • It also receives updates on Ombudsman determinations and progress against any orders, alongside the annual complaint's performance.
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.	Y	• Corporate values • Customer Experience Strategy • Internal process, including triage with department. • Collectively look at lessons learned as part of the process and as part of the organisational action plan • Complaint handling is included in the tender document along with expectations and response timescale.	• Complaint handling expectations are reflected through values and ways of working, emphasising collaboration, collective responsibility and professional standards. • Contractors/third parties are also required to cooperate with complaint investigations and timescales through tender and performance management arrangements.