

Housing Ombudsman Complaint Handling Code 2025

Self-assessment May 2025

Evidence is provided for each element of the Code, but commentaries / explanations are only provided where they are needed to clarify points of evidence, or to explain what steps we are taking to become compliant. Actions are highlighted and contained within our Complaints Improvement Plan.

RAG key: Compliant with appropriate assurance Compliant but further assurance needed Not compliant and/or significant assurance gaps

Section 1: What is a complaint?

Code	Code requirement	Have we complied with this requirement	Our evidence	Commentary / explanation	RAG
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	<u>Complaints Policy</u> (3.5) Complaints Procedure May 2024 (1.6) Staff training materials (CRS Training May 2024, Page 5)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. Staff training materials detail a compliant definition of a complaint.	
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	Yes	<u>Complaints Policy</u> (3.7, 4.4) Complaints Procedure May 2024 (2.1) Staff training materials (CRS Training May 2024, Page 5)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	



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	in line with the landlord's complaints policy.			<p>Staff training materials confirm the word 'complaint' not required to be treated accordingly.</p> <p>An action was set in 2024 to collect data to identify third party complaints in the system by the end of Q2 2024/25. System changes were completed by 01/08/2024 and subsequently reporting updated 30/09/2024.</p>	
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	<p><u>Complaints Policy</u> (3.1, 3.4, Section 4)</p> <p>Complaints Procedure May 2024 (1.6)</p> <p>Staff training materials (CRS Training May 2024, Page 5)</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>Staff training materials define a service request and complaint, and states service requests are recorded, monitored and reviewed.</p>	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<p><u>Complaints Policy</u> (3.2, 3.3)</p> <p>Complaints Procedure May 2024 (1.6)</p> <p>Staff training materials (CRS Training May 2024, Page 5)</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p>	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to.	Yes	<p><u>Complaints Policy</u> (4.6)</p> <p>Telephone surveys – TLF (Tenant Satisfaction Measures)</p> <p>Omnichannel Survey (pending)</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>Customer Insights and Engagement confirmed they do not send Complaint surveys via Dynamics,</p>	

	Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			<p>despite this still showing as being sent to customers on the Dynamics system.</p> <p>No Survey Monkey Feedback is obtained currently. This was stopped with the intension to replace with surveys via the new Omnichannel when this has launched.</p> <p>TLF carry out annual surveys (Tenant Satisfaction Measures) with customers via telephone, email and post.</p> <p>Adding signposting links to the complaints process via emails and with TLF was completed 16/07/2024.</p> <p>Further assurance is required.</p> <p>ACTION: Implement Survey via Omnichannel. Complete System changes by end Q2 2025/26.</p>	
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Section 2: Exclusions

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p><u>Complaints Policy</u> (3.6, 3.9 – 3.12)</p> <p>Complaints Procedure May 2024 (2.3, 2.7 – 2.9)</p> <p>Staff training materials (CRS Training May 2024 - Page 6)</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>Action set in 2024 to implement system changes to log refused complaints and review fair consideration.</p>	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and	Yes			

	<p>these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		System function to log and report on refused complaints	This was completed 01/08/2024 and reporting updated 30/09/2024.	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes			
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			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider	Yes			

	the individual circumstances of each complaint.				
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Section 3: Accessibility and Awareness

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (4.2 – 4.3) <u>Prioritisation Policy</u> <u>Customer website</u> Complaints Procedure May 2024 (1.1) Staff training materials <u>Customer communications</u> (Poster)	Our <u>customer website</u> details the way in which complaints can be raised: <ul style="list-style-type: none"> • Online (My Account) • By telephone • Live Chat • Online (e-Form) • Online (Email) • In writing • In person Action set from 2024 was completed: Posters are displayed amongst A2Dominion Schemes and offices to communicate methods of raising complaints and the subsequent process.	
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	<u>Complaints Policy</u> (4.1) Complaints Procedure May 2024 (2.1) Staff training materials <u>Customer communications</u> (Poster)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. Complaints information displayed in schemes and offices.	

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	<u>Complaints Policy</u> (Section 2, Section 8) Staff training materials CSC / Board papers	The Head of Complaints and Resolution monitors complaint levels across the business as part of performance monitoring for the Member Responsible for Complaints (MRC), Customer Services Committee (CSC) and Board.	
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	<u>Complaints Policy</u> (1.4, Section 4 ~ 4.15 – 4.27) <u>Customer website</u> Complaints Procedure May 2024 Staff training materials Customer Communications	Complaints Policy is available on the website <u>Complaints Policy</u> Navigating to a2dominion.co.uk, hovering over “Help” from the top. Our dedicated complaints page <u>Our complaints and resolution service - A2Dominion</u> sets out how customers can make a complaint and other useful information. The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. Non-Digital poster displayed in schemes and offices to give accessible information to customers.	
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	<u>Complaints Policy</u> (1.3) <u>Customer communications</u>	Articles are placed periodically in Home magazine (“We’re Improving our complaints service” May 2024). On-site staff at schemes are asked to print off a copy and pin it to a noticeboard. Action from 2024 creating non-digital promotional information (poster completed 07/08/2024).	

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	<u>Complaints Policy</u> (4.4) Complaints Procedure May 2024 (2.1) Staff training materials	Linked with 1.3, whilst we accept complaints from third parties, we do not currently collect data to identify these cases within our system. Action from 2024 completed to implement system change to collect third party complaints data. This is linked with 1.3. System changes completed on 01/08/2024.	
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	<u>Complaints Policy</u> (7.2 – 7.4) <u>Customer website</u> Complaints Procedure May 2024 Staff training materials Letter / email templates <u>Customer communications</u>	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. The public website at the page <u>Our complaints and resolution service - A2Dominion</u> states “You’re entitled to contact the Housing Ombudsman Service at any stage throughout the complaints process.” Following this the Housing Ombudsman information is provided. The page also states after a Stage 2 Response is given to the customer “If you remain unhappy following our final decision, you can contact the Housing Ombudsman Service”. Action from 2024 to review the Webpage and create a new customer area was completed on 27/06/2024. Linked with 3.1 & 3.5 We want to gain further assurance that customers have access to material promoting the Ombudsman and the Code non-digitally (leaflets, posters, etc.)	

				An action from 2024 was completed to create non-digital material to provide complaints information, which links to the Housing Ombudsman Service (HOS). This was in the form of a poster but is only displayed in offices and schemes. Considerations for promotional material to be sent via post to residents would be beneficial.	
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Section 4: Complaint Handling Staff

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	Organisational structure	<p>The overall complaint handling process is managed by the Complaints & Resolution Service (CRS) within the Operational Performance department.</p> <p>The CRS is led by the Head of Complaints & Resolution, supported by two Complaints Managers (Customer & Property), a Complaint Escalation Manager and Escalation Support Manager who themselves have a team of Complaints Caseworkers. The role of the CRS is to provide administrative support and case management to the overall complaints process.</p>	

				The Head of CRS is responsible for the interface with the Housing Ombudsman Service.	
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	Organisational structure	<p>Head of CRS is part of a wider group of heads of service, and also has a network of complaints champions from across the business.</p> <p>Complaints champions are embedded into individual departments, with each working closely with the assigned CRS worker to ensure that complaints are resolved promptly within their respective service areas. There are different processes followed at each of the stages of the complaint, and different processes depending on which lead department is identified.</p>	
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	<p>Organisational structure</p> <p>Staff training materials</p>	<p>CRS staff undergo significant amounts of training when they join us, including our complaint handling process and culture.</p> <p>Complaints champions embedded throughout the business receive training and refresher sessions both on a regular basis but also where intervention is needed as a result of performance.</p> <p>Head of CRS is responsible for ensuring that the team is adequately resourced.</p>	

Section 5: The Complaint Handling Process

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<u>Complaints Policy</u> Staff training materials Complaints Procedure May 2024 (1.6)	We operate a single policy for dealing with complaints covered by the HOS Code 2024. The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
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	<u>Complaints Policy</u> (4.9) Staff training materials Complaints Procedure May 2024 (2.2)	We do not have any pre-complaint, or informal complaint stage. The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
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	<u>Complaints Policy</u> (7.3) Staff training materials Complaints Procedure May 2024 (1.2 – 1.3) Letter templates	Our policy only contains two stages. The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
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	Yes		We do not contract out any aspect of complaint handling in relation to services carried out on our behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.	

	not be expected to go through two complaints processes.			Complaints requiring information from third parties such as contractors are investigated by a Complaints and Resolution caseworker with relevant parties in line with the code. The caseworker will provide any response/outcome to the customer.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		We do not contract out any aspect of complaint handling in relation to services carried out on our behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<u>Complaints Policy</u> (4.16 – 4.18, 4.25 – 4.26) Staff training materials Complaints Procedure May 2024 (3.3, 4.2) Letter Template Quality Assurance Assessments	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	
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	<u>Complaints Policy</u> (4.18, 4.26) Staff training materials Complaints Procedure May 2024 (3.3, 4.2)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	

5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	<u>Complaints Policy</u> (4.11) Staff training materials Complaints Procedure May 2024 (3.2, 3.6, 4.4, 4.5)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
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	<u>Complaints Policy</u> (4.16 – 4.19, 4.22 – 4.26) Staff training materials Complaints Procedure May 2024 (3.2, 4.2)	An Action was set in 2024 to complete system changes to allow record keeping of agreed complaint extensions without manual intervention. This was completed on 06/09/2024 with all fields accessible for reporting. This is also linked to 6.4 and 6.5 below.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<u>Complaints Policy</u> (4.3) Staff training materials Complaints Procedure May 2024 (3.3, 4.5) Customer records (Dynamics / UH / CM) <u>Prioritisation Policy</u>	As part of reports available to managers and senior managers, complaints raised against a customer file where a vulnerability is recorded are highlighted to enable proactive review. Resident / household vulnerabilities are recorded separately in our systems. CRS workers are trained to check recorded vulnerabilities across systems; however, a system change as of April 2025 has enabled vulnerability information to be visible on Dynamics to reduce the need for manual checks	

				<p>outside of Dynamics for the CRT. There are ongoing aims to work towards a centralised system.</p> <p>Vulnerability training (Alerts project) has commenced as of 10/04/25 and is ongoing across departments to implement improvements.</p>	
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	<p><u>Complaints Policy</u> (4.2)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (4.1)</p> <p>System changes</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>Action from 2024 was completed to implement a means of logging refused complaints and enable reporting.</p>	
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	<p><u>Complaints Policy</u> (4.8)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (3.8, 4.8)</p> <p>Customer records (Dynamics)</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>We use Dynamics 365 to record all aspects of customer feedback. Within this, there is a single timeline of a customer complaint, any correspondence with the customer or other parties, and any other relevant supporting documentation.</p>	
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	Yes	<p><u>Complaints Policy</u> (4.9, Section 5)</p> <p>Staff training materials</p>	The Complaints Policy is up to date and due for review 19/06/2027.	

	provided at any stage of the complaints process without the need for escalation.		Complaints Procedure May 2024 (Section 1, 2.2)	The Complaints Procedure is up to date and due for review 19/07/2027.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<u>Complaints Policy</u> (4.5) Staff training materials Complaints Procedure May 2024 (Section 5) <u>Customer Conduct Management Policy</u> (1.3, Section 3, Section 5, 6.1-6.2)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. The Customer Conduct Management Policy was approved (15/04/2024) and published (28/04/2025). This addresses the policy and guidance for unacceptable behaviour from residents and representatives and is due for review on 15/04/2028. This replaces the joint policy and procedure for Recording Cautionary Alerts against Residents and Household Members, and the Unacceptable Actions by Complainants Policy 2020. In response to actions from 2024, Cautionary alerts are now accessible on Dynamics via system changes rolled out on 10/04/2025. Reporting has also been implemented to demonstrate compliance and enable reviewing of restrictions. This was completed 06/09/2024. An action to implement an interim process for the Unacceptable Acts of Complainants was completed in October 2024. The Cautionary Alerts project went live on 10/04/2025 in response to the action set in 2024 for a more	
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			

				<p>formal process for recording decisions taken under the Policy.</p> <p>The HOS Self-assessment has been drafted 07/05/2025 to reflect actions compliance with the code.</p>	
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Section 6: Complaints Stages

Stage 1

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Staff training materials</p> <p>Complaints Procedure May 2024 (2.2)</p> <p><u>Prioritisation Policy</u></p> <p>Organisational structure</p>	Our Service Recovery team has been set up within repairs to support customers where we recognise repeated contact, with the aim to try and get works back on track.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	No	<p><u>Complaints Policy</u> (4.15, 4.19)</p> <p>Staff training materials</p>	The Complaints Policy is up to date and due for review 19/06/2027.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	<p>Complaints Procedure May 2024 (2.6, 3.4)</p> <p>Power BI reports</p>	<p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>Although the Policy and Procedure detail processes in line with the HOS requirements, the Complaints Improvement Action Plan is ongoing. Where 100%</p>	

			<p>CSC / Board reports</p> <p>Organisational Structure</p> <p>Quality Assurance Assessments</p>	<p>compliance has not been met consistently for 3 consecutive months compliance is not assured. This is being monitored by CSC and Board although currently the required timeframe to acknowledge and respond to complaints remains non-compliant, the intention is to evidence three months of consistent 100% compliance before the HOS Self-Assessment is updated.</p> <p>A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review. A Quality Assurance Assessment was completed in February 2025 highlighting cases of non-compliance with complaint handling timeframes. A further Quality Assurance Assessment was conducted May 2025 and the findings were consistent with multiple non-compliant cases being identified.</p> <p>ACTION: Review and continue the progress of the actions contained within the Complaints Improvement Plan.</p>	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint	Yes	<u>Complaints Policy</u> (4.19)	The Complaints Policy is up to date and due for review 19/06/2027.	

	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.		Staff training materials Complaints Procedure May 2024 (3.9) Customer records (Dynamics)	The Complaints Procedure is up to date and due for review 19/07/2027. As above in 5.9, an Action was set in 2024 to complete system changes to allow record keeping of agreed complaint extensions without manual intervention. This was completed on 06/09/2024 with all fields accessible for reporting. There is room now to report and review on the extensions recorded to inform further service improvements.	
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			
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<u>Complaints Policy</u> (4.10) Staff training materials Complaints Procedure May 2024 (3.7) Power BI reports	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. A new promise date process to track and update customers on outstanding actions was implemented on 22/08/24. This action was set in 2024 and the process now in use. The data collated is being used to drive performance improvements with significant improvement in overall compliance estimated to result in September 2025.	
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	<u>Complaints Policy</u> (4.12) Staff training materials Complaints Procedure May 2024 (3.7) Letter templates	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. A new department structure was implemented in 2024, which introduced a Quality Assurance area	

			Quality Assurance Assessments	offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	
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	<u>Complaints Policy</u> (4.20) Staff training materials Complaints Procedure May 2024 (3.10)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
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.	Yes	<u>Complaints Policy</u> (4.12) Staff training materials Complaints Procedure May 2024 (3.7) Letter templates Quality Assurance Assessments	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	

Stage 2

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (4.12, 4.29) Complaints Procedure May 2024 (4.1, 4.2) Staff training materials	. The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	No	<u>Complaints Policy</u> (4.22) Staff training materials Complaints Procedure May 2024 (4.2) Power BI reports CSC / Board reports	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. An action set in 2024 to enable Stage 2 Escalations to be recorded was implemented with appropriate reporting capabilities on 06/09/2024. A Complaints Improvement Action Plan is established and is starting to make progress. The progress against the plan is being monitored by CSC and Board. Further assurance is required to ensure compliance of the acknowledgement and recording of escalations to Stage 2 complaints in practice. ACTION: Continue the progress of the actions contained within the Complaints Improvement Plan	

				to achieve significant improvement in compliance by September 2024/25.	
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	<u>Complaints Policy</u> (4.24) Staff training materials Complaints Procedure May 2024 (4.1)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Complaints Policy</u> (4.23) Staff training materials Complaints Procedure May 2024 (4.4)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	No	<u>Complaints Policy</u> (4.26) Staff training materials Complaints Procedure May 2024 (4.4) Power BI reports CSC / Board reports	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. The issues identified above in 6.11 apply here too, and evidence on our response timescales show that despite the stated policy and procedure position, we are not compliant with the Code in respect of response timescales. ACTION: Continue the progress of the actions contained within the Complaints Improvement Plan to achieve significant improvement in compliance by September 2024/25.	

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	<u>Complaints Policy</u> (4.26) Staff training materials Complaints Procedure May 2024 (4.6) Customer records (Dynamics)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. System changes have been implemented in response to the action set in 2024. Dynamics offers the ability to log the Stage 2 agreed extension date and reason for the extension. This will enable further reporting and visibility on complaints that have been extended and why, which can be communicated to HOS as appropriate.	
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			
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.	No	<u>Complaints Policy</u> (4.10) Staff training materials Complaints Procedure May 2024 (4.7) Power BI reports	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. This links to 6.6. A new promise date process to track and update customers on outstanding actions was implemented on 22/08/24. This action was set in 2024 and the process now in use. The data collated is being used to drive performance improvements with significant improvement in overall compliance estimated to result in September 2025. Our performance of tracking outstanding actions to resolution needs to improve. Reports are provided to business areas (functions) to monitor 'promise dates' to resolution. Non-compliance of promise dates is	

				<p>reported to Director and Executive level for appropriate resolution.</p> <p>ACTION: Continue the progress of the actions contained within the Complaints Improvement Plan in order to achieve significant improvement in compliance by end Q2 2025/26.</p>	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p><u>Complaints Policy</u> (4.12)</p> <p>Staff training materials</p> <p>Complaints Procedure May 2024 (4.7)</p> <p>Letter templates</p> <p>Quality Assurance Assessments</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p>	
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes		<p>The Complaints Policy is up to date and due for review 19/06/2027.</p> <p>The Complaints Procedure is up to date and due for review 19/07/2027.</p> <p>A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.</p>	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p><u>Complaints Policy</u> (4.22)</p> <p>Staff training materials</p>	<p>The Complaints Policy is up to date and due for review 19/06/2027.</p>	

			Complaints Procedure May 2024 (4.3)	The Complaints Procedure is up to date and due for review 19/07/2027.	
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Section 7: Putting things right

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<u>Complaints Policy</u> (Section 5) Staff training materials Complaints Procedure May 2024 (Section 7) Letter templates Quality Assurance Assessments	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<u>Complaints Policy</u> (5.2) Staff training materials Complaints Procedure May 2024 (Section 8)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027.	

			<u>Compensation Policy</u> (Section 4)	The Compensation Policy is up to date and due for review 11/06/2027.	
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	<u>Complaints Policy</u> (5.3) Staff training materials Complaints Procedure May 2024 (Section 8) <u>Compensation Policy</u> Letter templates Power BI reports	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. The Compensation Policy is up to date and due for review 11/06/2027. As per 6.6 and 6.17 of this self-assessment, we monitor the progression of promise dates made in remedy of a complaint.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<u>Complaints Policy</u> (5.2) Staff training materials Complaints Procedure May 2024 <u>Compensation Policy</u> (1.3)	The Complaints Policy is up to date and due for review 19/06/2027. The Complaints Procedure is up to date and due for review 19/07/2027. The Compensation Policy is up to date and due for review 11/06/2027.	

Section 8: Self-assessment, reporting and compliance

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:	Yes	Annual Complaints Performance and Service Improvement Report 2022/23	The 2022/23 report was approved by Board in June 2023. The 2023/24 report has been approached in a more in-depth way. This was partly as a result of the	

	<ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 		<p><u>Annual Complaints Performance and Service Improvement Report 2023/24</u></p> <p>Annual Complaints Performance and Service Improvement Report 2024/25 (pending)</p>	<p>greater availability of data following steady improvements falling from the Complaints Improvement Plan, but also in recognition as a wider organisation that we needed to take a more critically analytical view of our performance – particularly how we evidence how we say we do things.</p> <p>The 2024/25 report is to be completed.</p>	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<p>Annual Complaints Performance and Service Improvement Report 2022/23</p> <p><u>Annual Complaints Performance and Service Improvement Report 2023/24</u></p> <p>Annual Complaints Performance and Service</p>	<p>The Board were asked to provide a response to the 2023/24 report will be the first time, which is published on our website.</p> <p>The 2024/25 report is to be completed.</p> <p>ACTION: Continue the progress of the actions contained within the Complaints Improvement Plan in order to achieve significant improvement in compliance by end Q2 2025/26.</p>	

			Improvement Report 2024/25 (pending)		
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		In line with the commentary for 8.1, and our future approach to self-assessment, we will update this self-assessment as necessary in line with the Code requirements.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		In line with the commentary for 8.1, and our future approach to self-assessment, we will update this self-assessment as necessary in line with the HOS requirements.	
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	<u>Complaints Policy</u> (Section 6)	The Complaints Policy is up to date and due for review 19/06/2027.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (8.2) Staff training materials Power BI reports CSC / Board reports	Operationally this is done through regular monitoring of reports relating to learning, led by the Head of CRS. This is also fed into regular reporting to CSC and Board.	

9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<u>Complaints Policy</u> (2.1, 2.2, 8.3) Staff training materials Power BI reports CSC / Board reports	CSC and Board are updated with learning from complaints and how that is embedded in service improvements. Additionally, we report back wider learning and improvements from complaints to customers through the <u>Customer Annual Report</u> , the colleague Intranet, as well as the Customer Services Committee and Board	
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	<u>Customer Annual Report</u>	.	
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	Organisational structure Power BI reports CSC / Board reports	The Head of CRS is appointed as accountable for the organisation's complaint handling. They are responsible for analysing complaints, including performance, trends and risks as well as recommending changes to policies and procedures. The Head of CRS reports to the AD Operational Performance who leads a directorate created in 2023/24, centralising a range of performance-related services which were once spread across the business, emphasises the commitment to streamlining the journey from service failures to service improvements. The AD Operational Performance reports into the Chief Customer Officer (CCO).	
9.5	In addition to this a member of the governing body (or equivalent) must be	Yes	Organisational structure	Emma Palmer (Board Member and Chair of CSC) is appointed as the MRC, and accountable to ensuring	

	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').			a positive complaint handling culture is embedded within the organisation. The MRC is supported in this role by the CCO and AD Operational Performance.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Power BI reports CSC / Board reports	The MRC is also the Chair of Customer Services Committee (CSC) where each quarter a KPI report is delivered, known as the performance and assurance (P&A) report, outlining performance on a range of matters, including complaints. Additionally, the Board receives, via CSC, a quarterly report on Customer Voice, which includes a section on complaint handling and performance, in line with the requirements in Code provision 9.7 below.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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	Organisational structure Power BI reports CSC / Board reports	As Code provision 9.6 above, both CSC and Board received regular updates on complaints data in line with these Code requirements. The annual complaints performance and service improvement report is presented to board ahead of submission to HOS each year. The last one presented in June 2024 for the period 2023/24.	
9.8	Landlords must have a standard objective in relation to complaint handling for all	Yes	Intranet articles	The CCO is delivering a campaign to Make Every Contact Count (MECC) which is being rolled out in	

	<p>relevant employees or third parties that reflects the need to:</p> <ol style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and act within the professional standards for engaging with complaints as set by any relevant professional body. 		Training videos	<p>phases, in recognition of the challenges we face with our systems and processes pending various improvement programmes.</p> <p>Phase 1 sees a standard objective for all colleagues in relating to recording every contact with customers.</p> <p>Phase 2 will take this a step further in line with Code provision 9.8.</p> <p>The CRS team specifically has objectives around complaint resolution.</p>	
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Version control

Date	Changes made	Completed by	Approved by	Approved on
07 May 2025	Self-assessment QA review made	Layla Clayton-Collier	Antonia Phillips, Head of Complaints and Resolution	June 2025
19 May 2025	Self-Assessment actions updated	Layla Clayton-Collier	Antonia Phillips, Head of Complaints and Resolution	June 2025