

Housing

Ombudsman Service



Complaint Handling Code

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Foreword

The heartbeat of this Code is enabling a positive complaints culture across the social housing sector.

This positive culture matters regardless of size or type of landlord. It supports strong resident-landlord relationships. It means things can be put right for residents when they have gone wrong. It helps organisations to develop and improve services. And, perhaps above all, it supports the values of justice and fairness that embodies so much of the sector's social purpose.

This Code considers complaints to be more than transactions. Nonetheless, good complaint handling requires effective procedures and well-trained staff alongside a positive complaints culture that enables those procedures to achieve maximum impact. This Code sets out what landlords must do procedurally to handle complaints. Compliance with the Code is most effective within landlords that operate within established dispute resolution principles: to be fair, puts things right, and learn from outcomes.

Landlords must embrace complaints through increased transparency, accessibility, and complaint handling governance, demonstrating that residents are core to its service delivery and good complaint handling is central to that.

This Code aims to support the earliest resolution of complaints while the matters are still within the landlord's own procedure. This can avoid issues escalating with potentially prolonged detriment to the resident, as well as requiring significantly more time and resource by the landlord to remedy.

This Code provides a guide to residents of what to expect if they make a complaint, as well as improving access and awareness to the procedure when they need it. The adoption of this statutory Code and associated duties ensures residents do not experience a postcode lottery in complaint handling.

Embracing the Code can also empower staff. Involvement in complaint resolution develops staff ownership, decision-making and engagement, and should ensure appropriate resources and tools are deployed to handle complaints. It provides senior staff with essential insight into day-to-day operations, allowing them to assess effectiveness and identify any organisational risks or issues. Lastly, data collected about complaints can be analysed and used to inform key business decisions to drive improvement in service provision.

Landlords are expected to annually self-assess against the Code, to engage its governance in that exercise and to publish the outcome. We also encourage landlords to see this exercise as an opportunity to engage residents in setting their approach to complaints to drive a positive complaints and learning culture. This approach must be captured by the landlord in a single policy for handling complaints.

The positive engagement of landlords in the Code and its principles has brought focus on the importance of complaints and the advent of this statutory Code will drive further change to the benefit of both residents and landlords.

Introduction

Statutory powers



The Social Housing (Regulation) Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints.

It also placed a duty on the Ombudsman to monitor compliance with a code of practice that it has issued.

The Ombudsman consulted on the Complaint Handling Code (the Code) and our intended approach to the duty to monitor in late 2023. The statutory Code will take effect from 1 April 2024 and our duty to monitor compliance will commence at the same time.

Compliance with the Code



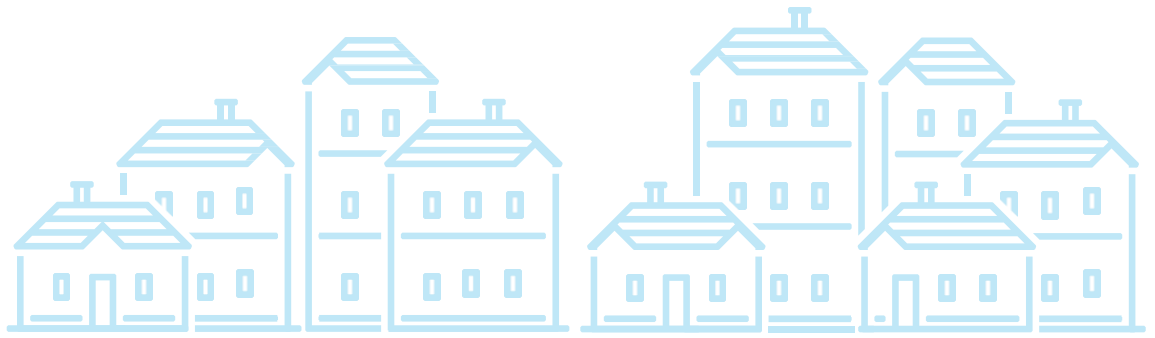
The Ombudsman believes all members must comply with all provisions in the Code as this represents best practice in complaint handling.

Where the Housing Ombudsman finds an organisation has deviated from the Code in policy or practice, it may use its powers to put matters right and ensure compliance with the Code. Where a landlord's policy does not comply with the Code, it must provide a detailed explanation for non-compliance in its self-assessment and the date by which it intends to comply.

Where there are exceptional circumstances which mean a landlord cannot meet specific requirements of Code, for example a small provider does not have a website, the

Ombudsman will take a proportionate approach. In these circumstances, landlords must undertake all reasonable endeavours 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.

Where a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, it must inform the Ombudsman of its reasons, provide information to residents who may be affected and publish this on their website. The landlord must provide all parties with a timescale for returning to compliance with the Code and the reasonableness of exemptions to the Code during this period may be assessed by the Ombudsman.



Monitoring compliance with the Code

The Ombudsman would like all landlords to have strong local complaint handling and a positive complaint handling culture – resolving complaints earlier and potentially without referral to the Ombudsman extends fairness to the benefit of all residents. This also leads to better services and strengthens relationships with residents.

We will use the duty to monitor compliance to further these aims by supporting better practice and providing opportunities for landlords to demonstrate complaint handling improvements.

Support for improvement will be provided through the Centre for Learning, accessible via our website, which hosts an ever-growing range of tools targeted at complaints handlers, senior managers and governing bodies.

We will monitor compliance in 3 ways. This will involve ensuring that the landlord:

- has scrutinised and challenged its compliance with the Code at its governing body through review of its self-assessment against the Code, its complaints handling performance and its learning from complaints, and published the outcome on its website annually
- complies with the Code in policy
- complies with the Code in practice

Where a landlord does not meet the requirements in any of the areas and does not move into compliance within a reasonable timescale, the Ombudsman may issue a Complaint Handling Failure Order (CHFO). The Ombudsman provides separate guidance on CHFOs on its website.

The Complaint Handling Code

1. Definition of a complaint

1.1. Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint.

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.'

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.

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.

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.

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.

2. Exclusions

2.1. Landlords must accept a complaint unless there is a valid reason not to do so. If a landlord decides not to accept a complaint it must be able to evidence its reasoning. Each complaint must be considered on its own merits.

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 12 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



- 2.3. A landlord must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless it is 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.
- 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.
- 2.5. A landlord must not take a blanket approach to excluding complaints; it must consider the individual circumstances of each complaint.

3. Accessibility and awareness

- 3.1. Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. A landlord must consider its duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints 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.

- 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.
- 3.4. A landlord must make its complaints policy available in a clear and accessible format for all residents. This will detail the 2-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.
- 3.5. The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.
- 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.
- 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.



4. Complaint handling staff

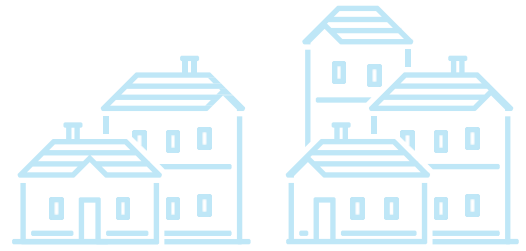
- 4.1. Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.
- 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.
- 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.

5. The complaint handling process

- 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.
- 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.

- 5.3. A process with more than 2 stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.
- 5.4. Where a landlord's complaint response is handled by a third party (such as a contractor or independent adjudicator) at any stage, it must form part of the 2-stage complaints process set out in this Code. Residents must not be expected to go through 2 complaints processes.
- 5.5. Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.
- 5.6. When a complaint is logged at stage 1 or escalated to stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.
- 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.

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
- d) consider all relevant information and evidence carefully

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.

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.

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. A landlord must clearly set out these reasons, and it must comply with the provisions set out in section 2 of this Code.

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.

5.13. Landlords must have processes in place to ensure that a complaint can be remedied at any stage of its complaints process. Landlords must ensure that appropriate remedies can be provided at any stage of the complaints process without the need for escalation.

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.

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.



6. Complaints stages

Stage 1

- 6.1. Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.
- 6.2. Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within 5 working days of the complaint being received**.
- 6.3. Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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
 - g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response



Stage 2

- 6.10. If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.
- 6.11. Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure **within 5 working days of the escalation request being received.**
- 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.
- 6.13. The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.
- 6.14. Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.
- 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.
- 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.
- 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.
- 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.
- 6.19. Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:
- the complaint stage
 - the complaint definition
 - the decision on the complaint
 - the reasons for any decisions made
 - the details of any remedy offered to put things right
 - details of any outstanding actions
 - details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied
- 6.20. Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.



7. Putting things right

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, adding a correction, or addendum
- providing a financial remedy
- changing policies, procedures, or practices

7.2. Any remedy offered must reflect the impact on the resident as a result of any fault identified.

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.

7.4. Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

8. Self-assessment, reporting, and compliance

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.

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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.

8.3. Landlords must also carry out a self-assessment following a significant restructure, merger, and/or change in procedures.

8.4. Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.

8.5. If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, it must inform the Ombudsman, provide information to residents who may be affected, and

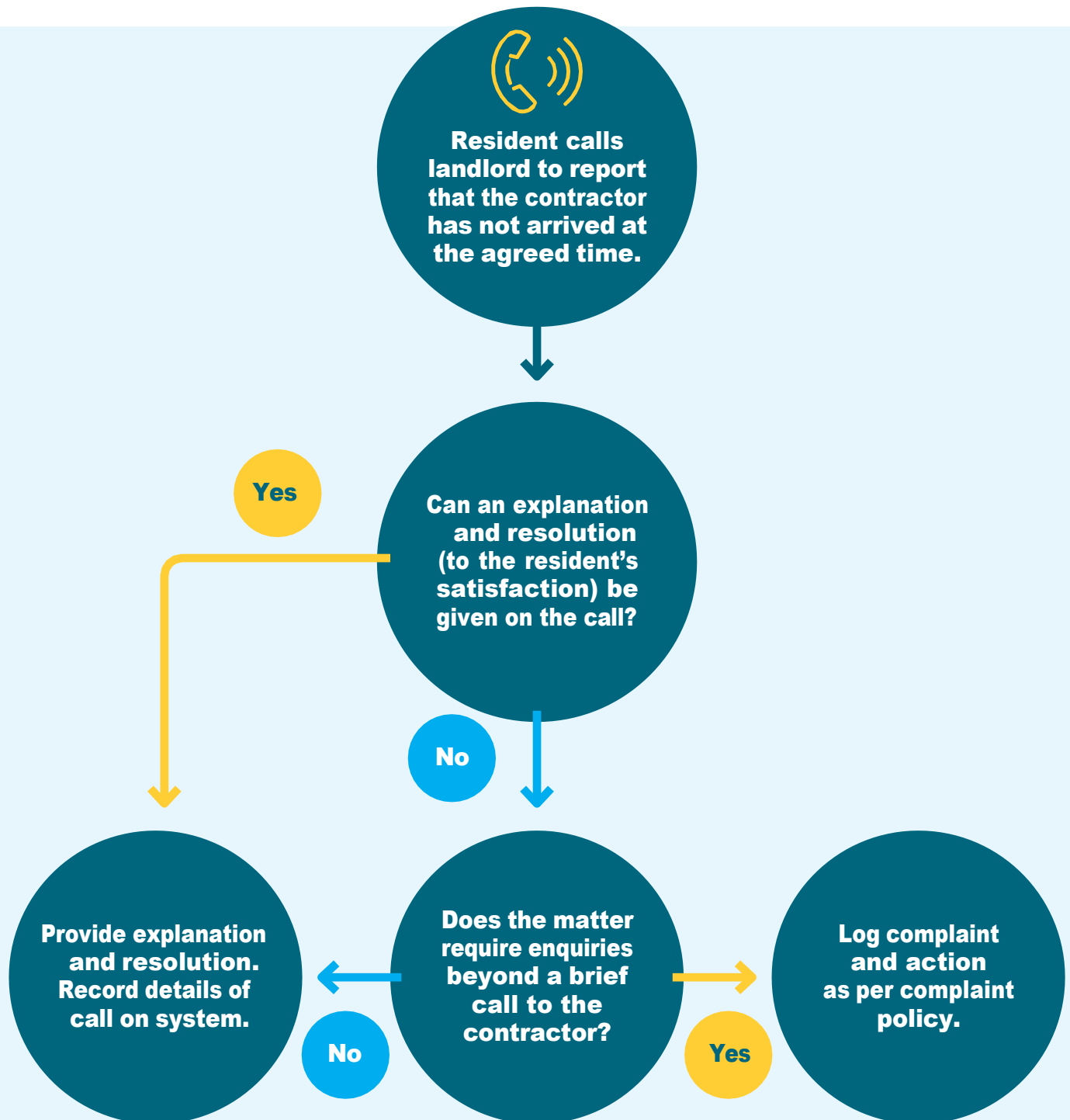


publish this on its website. Landlords must provide a timescale for returning to compliance with the Code.

9. Scrutiny and oversight: continuous learning and improvement

- 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.
- 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.
- 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.
- 9.4. Landlords must appoint a suitably senior lead person as accountable for its complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
- 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 (MRC).
- 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.
- 9.7. As a minimum, the MRC and the governing body (or equivalent) must receive:
 - a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance
 - b) regular reviews of issues and trends arising from complaint handling
 - c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings
 - d) the Annual Complaints Performance and Service Improvement report
- 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
 - c) act within the professional standards for engaging with complaints as set by any relevant professional body

Appendix A: Service request or complaint flow charts



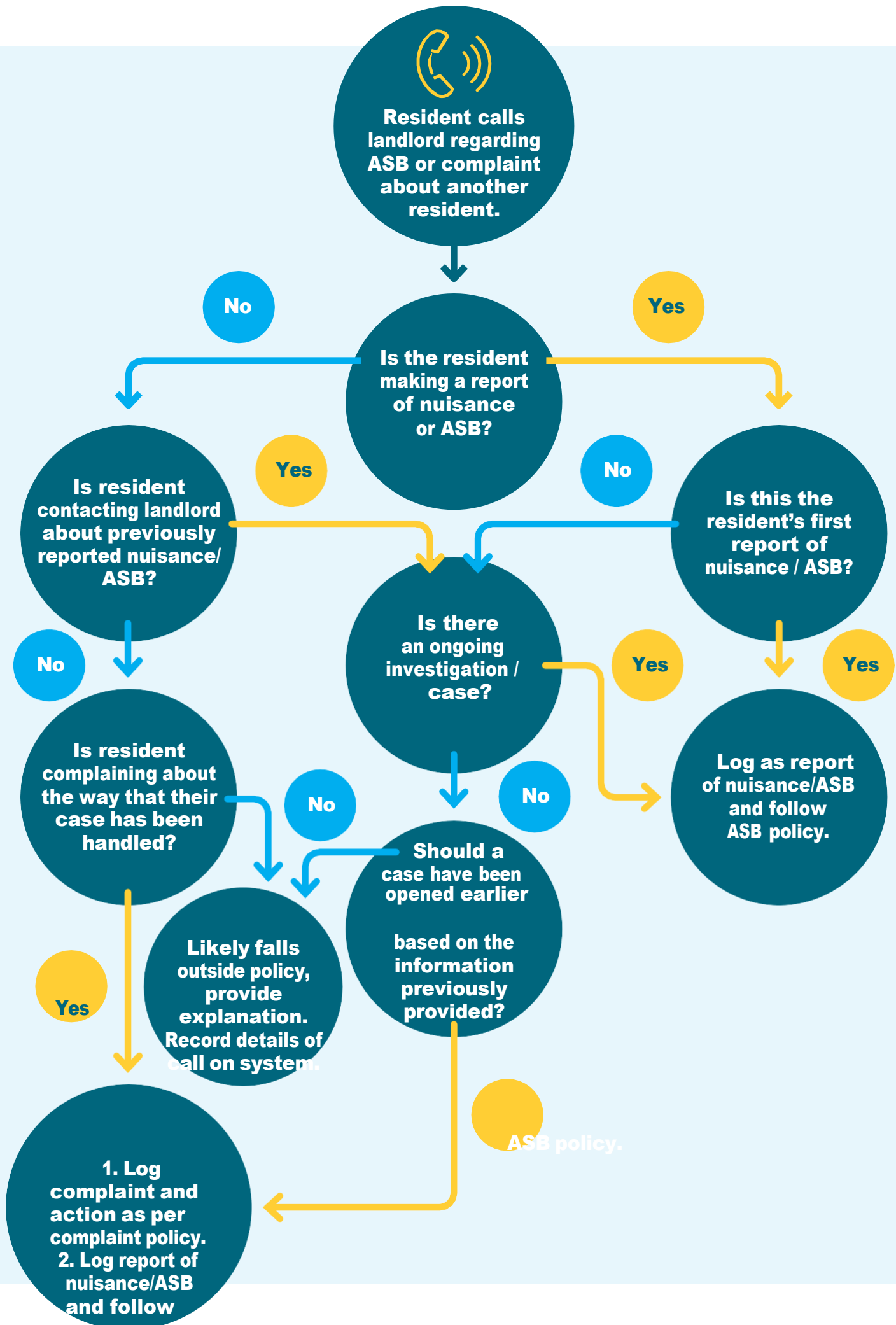


Yes

Yes

Yes

Yes



Yes

Appendix B:

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.



**Scan here to view the
annual submissions form**



Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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>	Y	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Make a Complaint - Hilldale Housing Association	<p>Point 4 of the policy sets out the definition.</p> <p>Internal training SharePoint for complaints also highlights the definition of a complaint as the headline of the page.</p> <p>Page for complaints on website highlights definition.</p>
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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf SharePoint- complaints	<p>Point 4 of the policy. Internal training SharePoint for complaints also highlights the definition of a complaint.</p> <p>Process training flow charts on SharePoint taken from the Code demonstrate how a resident may raise dissatisfaction without saying 'complaint'.</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.	Y	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf SharePoint- complaints	<p>Point 4 of the policy sets out what we would not consider a complaint and point 5 sets out how this will be actioned.</p> <p>SharePoint for complaints uses ombudsman flow charts to demonstrate how to assess.</p> <p>Service requests are recorded on a tracker and reviewed alongside formal complaints at our monthly lessons learnt meeting.</p>

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	Our complaints policy makes clear that a complaint must be logged when a resident expresses dissatisfaction (point 4) with the response to a service request. Staff are trained to recognise these situations and ensure that complaint handling runs in parallel with continued efforts to resolve the original issue. For example, if a resident expresses dissatisfaction with the time taken to carry out a repair, this is recorded as a complaint, while repair works continue as planned. ensuring that complaint resolution does not delay or halt service delivery. We can evidence this approach through case records, staff guidance, and resident communications
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	Hilldale-GettingInvolved-A4-online.pdf (3) Facebook (3) Facebook	We complete the yearly TSM and would not take the feedback from TSM as a complaint but if a resident expressed dissatisfaction they would be signposted in person to the complaints process. The other surveys we run are repairs, complaints and ASB. If dissatisfaction was expressed on repairs survey or ASB the complaint officer would contact them with complaints process details. We also promote the complaints process through leaflets and campaigns.

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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	Point 4 of our policy sets out when we would not accept a complaint. If a complaint met these points and we refused to accept we would outline this to the complainant on why we refused to accept and provide them with the Ombudsman details. We have not refused to accept any complaints this year.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • the issue giving rise to the complaint occurred over 12 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 	Y	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Unreasonable-Behaviour-policy.pdf	<p>Set out within point 4, we have also included an additional 6 points:</p> <ul style="list-style-type: none"> <input type="checkbox"/> It is an initial request for a service- A service request is a request from a resident to the landlord requiring action to be taken to put something right. <input type="checkbox"/> It is a request for information <input type="checkbox"/> It is a complaint about a service not provided by, or contracted by us <input type="checkbox"/> The complaint relates to the annual rent or service charge increase, unless we have failed to provide a service paid for through the service charge or we are made aware of a potential error in the calculation of the rent or service charge. <input type="checkbox"/> The complaint relates to a report of anti-social behaviour, unless we have failed to investigate the report in line with our anti-social behaviour policy and procedure. <input type="checkbox"/> We may refuse to engage with customers who behave in an unacceptable manner.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	Set out within point 4. Where complaints are raised with current issues but also include historic issues we will consider this as part of the wider complaint for example COM00064
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	Make a Complaint - Hilldale Housing Association	We have not refused any complaints within this year but if we did the Complaints officer would provide full detail of the Ombudsman service. Our website details if a resident is not happy with the response they may contact the Ombudsman and provides details of how to access the service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	Point 7 of our policy states our principles.

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	Make a Complaint - Hilldale Housing Association 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf (3) Facebook Complaint Process	Our tenants all have protected characteristics and we will accept complaints in any way that is best for our tenant. Most of our complaints come from advocates for tenants. We have the website to make a complaint, with accessibility tool. Phone number to call, Facebook, WhatsApp and in person to a staff member.
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	Internal training assigned via cascade from the Ombudsman center of learning for all staff. October 2024 refresh training held via Microsoft teams for all staff. April 2025 campaign 'Talk to us' email to staff to remind them of role they play.	Training is given to all staff so everyone understands the role they play in raising complaints- This is refreshed every 6 months. Dedicated page on SharePoint for all staff to access with full details, training and flow charts.
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	Insert link to involvement leaflet (3) Facebook Make a Complaint - Hilldale Housing Association Quarterly feedback forum slides saved on SharePoint	We actively promote raising complaints, via 6 monthly campaigns on socials and emails to contacts, through posters placed in schemes and as part of our involvement leaflet. We have a dedicated web page for complaints transparency and note they are 'a valuable source of feedback' we promote the process at our quarterly Feedback forum

Section 3: Accessibility and awareness

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the 2-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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Complaint Process	<p>Published on website with accessibility tool.</p> <p>The policy was developed and approved with our Voice panel in Feb 24 to adapt it to be more tenant friendly.</p> <p>Voice panel created an easy flow process to sit alongside the policy to make clear process.</p>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Make a Complaint - Hilldale Housing Association	<p>Point 2 covers publicise. Point 6 covers Ombudsman details.</p> <p>Website includes details of Ombudsman.</p>
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 raised on housing management system by care providers or parents of.	We provide housing for tenants with disabilities, majority of our complaints are raised through the care provider on site or a parent of. Evidence of this can be seen through individual complaints cases.
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	Make a Complaint - Hilldale Housing Association 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Complaint Process Template letters on SharePoint	<p>Details of service on website, in point 6 of policy, on complaint process flow.</p> <p>template complaint letters at each stage outcome detail the Ombudsman details.</p> <p>When extending complaint details given via email.</p>

Section 3: Accessibility and awareness

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	Complaints officer is customer engagement manager for change housing. Board reports. Customer committee reports	Complaints officer handles all stage 1 complaints, will discuss complaints with wider leadership team. senior managers responsible for stage 2. CO provides updates to board and customer committee.
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	Complaints officer is customer engagement manager for change housing. Complaints officer completes regular Ombudsman training.	We obtain services from change housing, the CO handles our complaints meaning access to all staff in Hilldale and change. The CO also regularly completes Ombudsman training to ensure maintaining key principles.
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	Lessons learnt meeting and tracker Board reports Customer committee reports Hilldale-annual-complaint-performance-and-service-improvement-report.pdf 6 monthly training sessions and refresher Cascade assigned training through HO center of learning.	Monthly complaints lessons learnt meeting to discuss trends and make service improvements, monitored through a tracker. Reported to board and customer committee. Annually published service and improvement report to show lessons learnt and improvements made. Staff receive regular training to emphasize importance of complaints culture.

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	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Make a Complaint - Hilldale Housing Association	We only have one complaints policy which is published on our website.
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	SASSHA- Complaints module only has 2 stages. 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Complaint Process Complaint outcome letters	Point 6 of policy shows 2 stage process. Our complaints module in our housing management system was built with only 2 stages. Easy follow complaints process also highlights only a 2 stage process. Outcome letters explain only stage 1 and 2 then Ombudsman as exhausted our process.
5.3	A process with more than 2 stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman	Y	SASSHA- Complaints module only has 2 stages. 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Complaint Process Complaint outcome letters	Point 6 of policy shows 2 stage process. Our complaints module in our housing management system was built with only 2 stages. Easy follow complaints process also highlights only a 2 stage process. Outcome letters explain only stage 1 and 2 then Ombudsman as exhausted our process.

Section 4: Complaint handling staff

5.4	Where a landlord's complaint response is handled by a third party (such as a contractor or independent adjudicator) at any stage, it must form part of the 2-stage complaints process set out in this Code. Residents must not be expected to go through 2 complaints processes.	Y		N/A only investigated internally by complaints officer if other parties are required for input this will be included in the same one complaint.
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Section 5: The complaint handling process

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	N/A	No 3rd party handles our complaints
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	SASSHA – complaints module Emails to complainant. Acknowledgment letters	Complainant is asked at time of raising complaint their concerns, this is outlined in the acknowledgment letter along with the resolution they are seeking. If this is not understood when officer investigates they will make contact to understand complaint and outcome seeking, Example COM00089.
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	Template acknowledgment letters held on SharePoint.	This is set out in the acknowledgment letters if we are not responsible.

Section 5: The complaint handling process

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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 d. consider all relevant information and evidence carefully 	Y	<p>4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf</p> <p>Housing Ombudsman dispute resolution training.</p>	<p>Set out in point 7 of policy.</p> <p>CO completed dispute resolution training to ensure following key principles of the code in all complaint handling.</p> <p>Each complaint is treated on its merit and information gathered from complainant and all relevant parties to address the case with full information and balanced view.</p>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Y	<p>4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf</p> <p>SASSHA complaints module</p> <p>Extension emails</p>	<p>Point 6 of our policy states timescales for complaints.</p> <p>1 complaint has gone out of timescale.</p> <p>All timescales are recorded on the complaints module.</p> <p>Any extensions within the code are advised via email to the complainant and a copy saved on the complaint file.</p>

Section 5: The complaint handling process

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	Hilldale-EDI-Strategy-2024-2027-v2 1.pdf 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf SASSHA- tenant contact screen- personal	<p>Point 9 of our policy points to the internal documents we consider; EDI policy and reasonable adjustments.</p> <p>Tenants disabilities that may need to be considered are recorded in their tenant contact file on our housing management system.</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.	Y	Make a Complaint - Hilldale Housing Association	<p>We have not refused to escalate any Complaints, Complaints officer would provide full detail of the Ombudsman service.</p> <p>Our website details if a resident is not happy with the response they may contact the Ombudsman and provides details of how to access the service.</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.	Y	SASSHA- Complaints database	Each complaint is recorded on SASSHA with correspondence saved against the documents section.

Section 5: The complaint handling process

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	Complaint service and improvement report Compensation-and-Redress-Policy-2024.pdf 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	complaints raised in last year only 2 of these were escalated to stage 2. Compensation has been offered as resolution on complaints.
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	Unreasonable-Behaviour-policy.pdf Hilldale-EDI-Strategy-2024-2027-v2 1.pdf	We have not refused to deal with any complaints or put any restrictions in place with a complainant however we do have a policy for managing this if required.
5.15	Any restrictions placed on contact due to unacceptable behavior must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Y	Unreasonable-Behaviour-policy.pdf SASSHA- tenant person screen – recorded disability/vulnerability.	We have an unacceptable behavior policy that outlines acceptable behavior. In applying any restrictions we would always consider individual circumstances and known disabilities/vulnerabilities.

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	SharePoint- complaints- Flow charts to help assess if complaint Time to resolve stage 1 complaints.	Flow charts have been created to help wider team assess if complaint and log onto our housing management system. Once the complaint is received the complaints officer will gather the information and look to resolve as promptly as possible. 65% (25 of 38)of stage 1 complaints where resolved before due date.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Y	SASSHA- complaints database	90% (4 out of 38) of complaints received have been logged within 5 days. Issues raised directly via email with housing officers are not always picked up within the time frame due to leave etc. to mitigate HO's put out of offices on.

Section 6: Complaints stages

Stage 1

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Y	SASSHA- complaints database	97% (37 out of 38) of complaints responded to within 10 working days. 1 complaint was responded a day over timeline due to staff availability.
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Section 6: Complaints stages

Stage 1

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	SASSHA-complaints database	Complaints are only extended past 10 days if unable to reach a conclusion. Complainant is informed and ombudsman details provided at point of extension. No complaints have gone over 20 working days total.
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	SASSHA- database	When an extension is required email is sent to confirm and Ombudsman details provided.
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	Complaint outcome letters and emails	In the case where complaint outcomes have been provided but the issue not resolved (such as outstanding repair) this is noted in the outcome letter and on the email to the complainant.
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	Complaint outcome letters	We ensure all complaints are fully addressed by clearly defining the issues raised at the outset and responding to each point individually. Our complaint responses include clear

Section 6: Complaints stages

Stage 1

				<p>explanations for decisions made, referencing the relevant policies, tenancy agreements, legal obligations, or recognised good practice where applicable.</p> <p>Complaints officers uses a consistent response template to provide transparent reasoning. This helps ensure tenants understand how conclusions were reached and supports fair and accountable complaint handling</p>
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Section 6: Complaints stages

Stage 1

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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.	Y	Complaints raised. Example COM00064	Where complainants have raised additional issues during the complaint investigation these have been included, example COM00064
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response 	Y	Template letters on SharePoint Outcome letters saved on SASSHA	All complaints are responded to using a letter template that ensures point A to G is addressed as part of the outcome in each complaint. Complaint outcomes are sent in the form of a letter via email and we consider language used is understandable.

Section 6: Complaints stages

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	Stage 2 complaints Complaint service and improvement report	Where dissatisfaction has been expressed at stage 1 complaint has been escalated to a stage 2. 2 complaints raised to a stage 2.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within 5 working days of the escalation request being received.	Y	SASSHA- Complaints module	2 stage 2's have been logged within the 5 working days of expressing dissatisfaction with stage 1.
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 2 complaints	We would not expect complainant to explain why they wanted to raise a stage 2, 1 of our stage 2's did not ask to raise but expressed dissatisfaction with our response at stage 1, the other requested further review due to compensation offered.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf Sassha- Complaints module stage 2 Stage 2 outcome letters	Point 6 of our policy-stage 2- states a senior manager will review. Complaints database evidences stage 2 assigned to a senior manager. Outcomes letters are sent by senior managers.

Section 6: Complaints stages

Stage 2

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Y	Complaints service and improvement report. SASSHA- complaints database	2 stage 2 complaints raised both responded to on time.
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 service and improvement report. SASSHA- complaints database	1 complaint was extended due to the complexity and partnership working required to reach a response and resolution. Email was sent to advise of the extension with Ombudsman information.
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.	Y	SASSHA- complaints database	1 complaint was extended due to the complexity and partnership working required to reach a response and resolution. Email was sent to advise of the extension with Ombudsman information.

Section 6: Complaints stages

Stage 2

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	Outcome letters SASSHA- Complaints database	This was the case for one of our stage 2's Com00064/002 works were not complete but resolution was reached and action tracker was created to follow up actions after complaint.
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Section 6: Complaints stages

Stage 2

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	Complaint outcome letters	Complaints outcome letters and templates include all information.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> 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 g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied 	Y	<p>Template letters on SharePoint</p> <p>Outcome letters saved on SASSHA</p>	<p>All complaints are responded to using a letter template that ensures point A to G is addressed as part of the outcome in each complaint.</p> <p>Complaint outcomes are sent in the form of a letter via email and we consider language used is understandable.</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	<p>4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf</p> <p>Leadership team meeting minutes</p>	<p>We only have a 2 stage process as per point 6 in policy.</p> <p>Stage 2's have been discussed at leadership meetings and wider complaints meetings to</p>

Section 6: Complaints stages

Stage 2

			Complaints meetings	ensure a full response can be given.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • apologising • acknowledging where things have gone wrong • providing an explanation, assistance, or reasons • taking action if there has been delay • reconsidering or changing a decision • amending a record or adding a correction or addendum • providing a financial remedy • changing policies, procedures, or practices 	Y	<p>Template letters</p> <p>Housing Ombudsman training :</p> <ul style="list-style-type: none"> • Apologies • Attitudes rights and respect • Dispute resolution 	<p>We ensure all complaints are fully addressed by clearly defining the issues raised at the outset and responding to each point individually. Our complaint responses include clear explanations for decisions made, referencing the relevant policies, tenancy agreements, legal obligations, or recognised good practice where applicable.</p> <p>Complaints officers uses a consistent response template to provide transparent reasoning. This helps ensure tenants understand how conclusions were reached and supports fair and accountable complaint handling. All staff have been assigned relevant training through the Ombudsman E-learning to strengthen their complaint handling and responses.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Outcome letters Compensation-and-Redress-Policy-2024.pdf 4SG-P-030-Complaints-Policy-Customer-Friendly-v2-PAG-26.02.2024-1.pdf	Our complaints procedure ensures that when a fault is identified, we assess the specific impact on the resident—whether emotional distress, time and trouble, loss of service, or inconvenience. We use the Ombudsman’s Remedies Guidance to guide our assessment and determine an appropriate response. Remedies offered are not 'one-size-fits-all' but tailored to the tenants experience and the severity of the fault. Where appropriate, we offer compensation, reimbursement, apology letters, or practical solutions (such as prioritising repairs
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	Outcome letters SASSHA- Complaints module	When a remedy is proposed, we ensure it is clearly communicated to the complainant, outlining what actions will be taken, expected timeframes. We aim to agree the plan with the complainant wherever possible, especially in cases involving repair works or service improvements that require access or scheduling. All remedies are logged and tracked through our case management system, with follow-up checks to ensure completion

Section 7: Putting things right

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	<p>Housing Ombudsman training:</p> <ul style="list-style-type: none"> • Apologies • Attitudes rights and respect • Dispute resolution 	<p>Our complaints handling process is informed by the Housing Ombudsman's Remedies Guidance. We regularly refer to this guidance to ensure that remedies offered are proportionate, consistent, and appropriate to the severity of the service failure or maladministration</p>
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Section 8: Self-assessment, reporting, and compliance

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
8.1	<p>Landlords must produce an Annual Complaints Performance and Service Improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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 f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord 	Y	<p>Link to report when published</p> <p>See draft report</p>	See published report for all information.

Section 8: Self-assessment, reporting, and compliance

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	Add link to report once published on website	Draft reported submitted to CC
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	N/a	No restructure/merger or change in procedure so not applicable.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	N/a	If applicable we would follow this action
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.	Y	N/a	If applicable we would follow this action

Section 9: Scrutiny and 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	Monthly complaints lessons learnt meeting. SharePoint- Tracker for complaints	The management team meet monthly to discuss complaints and themes, actionable improvements are driven from this meeting and followed through to ensure service improvements are made.
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	Monthly complaints lessons learnt meeting. SharePoint- Tracker for complaints	We are committed to fostering a positive complaints culture where complaints are seen as valuable feedback and an opportunity to learn. Our approach goes beyond resolving individual disputes; we use complaints data to identify service trends, recurring issues, and areas for improvement. Complaints are regularly reported to senior management and board, including themes, root causes, and outcomes. Learning from complaints is shared across departments and contributes to service reviews and improvement plans.

Section 9: Scrutiny and oversight: continuous learning and improvement

9.3	<p>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.</p>	Y	<p>Complaints annual report</p> <p>Tenant Annual report</p> <p>Board reports</p>	<p>We are committed to being transparent in how we use complaints to drive service improvement. Complaint trends, key learning points, and actions taken are regularly reported to our senior leadership team and board.</p> <p>We publish learnings and improvements through our annual complaints report and our annual tenant report.</p>
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Section 9: Scrutiny and oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	Customer Engagement Manager role	Our customer engagement manager is accountable for complaints handling, the customer engagement manager leads on Complaints, tracking analyzing and implementing service improvement.
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 (MRC).	Y	New board member appointed Chair of customer committee Housing Ombudsman MRC training.	We have appointed a new board member, this member will also act as the MRC and be the head of the newly created customer committee, they will be responsible for leading on complaints scrutiny and compliance and have completed relevant Housing Ombudsman MRC training.
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	Customer Committee Board meetings	From April 25 we have established a new customer committee, the complaints officer will provide full complaints handling performance details to the committee for scrutiny, the MRC will then ensure board of compliance.

Section 9: Scrutiny and oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <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 finding d. Annual Complaints Performance and Service Improvement report. 	Y	<p>New board members and customer committee member- MRC</p> <p>Board reports</p> <p>Annual complaints and service improvement report</p>	<p>Our board receive quarterly updated on complaints, numbers raised, themes, learnings and improvements made.</p> <p>We have appointed a new board member who will also sit on our customer committee and act as the MRC receiving quarterly updated on complaints and will scrutinize this as part of the committee and MRC responsibility.</p> <p>Each year we publish a annual complaints service and improvement report, this is approved by our board and published on our website with their response.</p>

Section 9: Scrutiny and oversight: continuous learning and improvement


Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others c. act within the professional standards for engaging with complaints as set by any relevant professional body 	Y	<p>CASCADE- Housing Ombudsman training</p> <p>Talk to us- October and April</p> <p>Complaints officer- Housing Ombudsman center of learning training</p>	<p>Training on complaint handling and culture is provided to staff on a regular basis and reinforced through team meetings and internal communications. Complaints learnings and housing ombudsman spotlight reports are shared with the wider team to create a positive culture in regards to complaints.</p>

Housing Ombudsman Service

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