

## Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  <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>	✓	Direct quote in the policy and information booklet	
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.	✓	Complaints handling policy and complaints handling information booklet	Tenants are encouraged to consider whether they want a comment or expressed disgruntlement dealt with as a complaint – complaints booklet and form are handed out at that point with the offer of assistance in filling out the form.
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.	✓	Clearly identified in Complaints handling policy and complaints handling information booklet	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if	✓	Comments, Compliments and Complaints log includes cross reference to ongoing service	

	the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.		provision, maintenance records and tenant file	
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.	✓	A clause to this extent is added to all surveys and feedback forms	

## 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	✓	The reasons for not accepting a complaint are clearly set out in the policy and information booklet – In addition, response letter templates include an explanation section for non-acceptance	Comments, compliments and Complaints log identifies valid reason – the issue is still recorded as a comment and response letters are logged and referenced to tenant file
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	✓	Acceptable exclusions are clearly stated in the policy and information booklet – Comments, compliments and Complaints log	As per policy documents, response letters include explanation, as well as a reminder of contact details for Housing Ombudsman
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	✓	Comments, Compliments and Complaints log	Considerations are logged in the form of summarised complaints handling meeting notes

	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.	✓	As stated above, an explanation section is included in the template response letter and contact details for Housing Ombudsman are provided in all responses, policy and information booklet. Reference is made in the complaints log.	As per policy documents, response letters include explanation as well as a reminder of contact details for Housing Ombudsman
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	✓	Policy and information booklet – Comments, compliments and Complaints log and discussion notes	The complaints handling coordinator discusses cases considered for exclusion with members of the executive team. A summary of discussion outcomes is logged in the comments, compliments and complaints log, and provided to the complainant in the response letter.

### 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.	✓	Range of available channels; In person, via email, over the phone, in writing and via our website.  Ease of access and process is surveyed for each complaints case closed.	
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.	✓	Annual staff training guarantees awareness of policy and process. Designated Complaints handling coordinator	
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.	✓	We have seen a small increase in complaints since slightly adjusting our complaints handling process to reflect the new complaints handling code last year. However, we still do not see a high volume of complaints.	Tenants are encouraged to consider whether their comment or expressed disgruntlement should be dealt with as a complaint – A complaints handling information booklet and form are handed out at that point with the offer of assistance in filling out the form. On seeking feedback, tenants state they chose to not make a complaint because they are being listened to and the issue they raised is dealt with proactively.

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.	✓	<ul style="list-style-type: none"> <li>• Published on Website,</li> <li>• Information booklets available in communal areas</li> <li>• Policy information booklet included in sign-up pack</li> <li>• Regular reminders in tenant newsletters</li> <li>• Reminders given during Face-to face contact with tenants</li> </ul>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	✓	Included in the policy and information booklet	
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.	✓	As per policy and Information booklet	
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.	✓	As per policy and Information booklet	

## 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.	✓	Responsibility is identified in the role of Complaints and Business Support Officer (title of role changed to reflect this)	
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.	✓	As per job description and internal complaints handling process flow chart	
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	✓	Training log Lessons learned are shared with wider staff team, i.e., during monthly staff briefings Designated roles involved in complaints handling process	All staff receive annual complaints handling training and complaints are discussed with relevant staff to allow for lessons learned – meeting discussions are summarised and outcomes logged.



## 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.	✓	The comments compliments and complaints log indicates that each complaint is handled on its own merit.	Working closely and frequently with tenants, staff are aware of the risk of unintended bias and seek out colleagues to ensure independent investigation.
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.	✓	Where tenants expressively state they do not want to make a complaint, we inform them that we will log the issue raised as a comment, so as not to lose the chance to learn from identified patterns should others report the same concern.	Whereas we encourage tenants to use our complaints handling process, we fear that, when pushed too much, they will refrain from raising issues altogether. We acknowledge that in some cases tenants just want to know they are being listened to.
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.	✓	As per policy and Information booklet, we have a two-stage process	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	✓	NA	

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	✓	Checks of third-party complaints handling procedures are carried out as part of approved contractor assessments.	Complaints about third parties are handled according to our internal policy
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.	✓	Template investigation proforma and acknowledgement and response letters include standing items such as “complaint definition” and “outcomes” paragraphs	
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.	✓	Landlord responsibilities are clearly set out in acknowledgment and response letters	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	✓	As per policy and investigation proforma. Transactional surveys after a case is closed indicate this happens	
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	✓	NA – but provision made in the complaints handling process and flowchart informing the investigating	

	suitable intervals for keeping them informed about their complaint.		officer what is expected in terms of keeping tenants informed	
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.	✓	Standard practice in line with our EDI framework – not specific to complaints handling, although provision is set out in the complaints handling policy	
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.	✓	As per policy and information booklet.	<p>We escalate complaints through all stages of the complaints procedure. Refusal may only happen when a complaint is received initially based on grounds of exclusion as set out in the code, i.e.:</p> <ul style="list-style-type: none"> <li>• the issue giving rise to the complaint occurred over 12 months ago</li> <li>• legal proceedings have started. This is defined as details of the claim,</li> <li>• such as the Claim Form and Particulars of Claim, having been filed at court</li> <li>• The matter has previously been considered under the complaints policy</li> </ul>

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.	✓	Complaints handling log is complete and accurate and cross references documents included in tenants' files.	
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.	✓	Operational processes are efficient and consistent – responses and remediation are checked for timeliness, completeness, consistency and tenant satisfaction. Compensation or gestures of goodwill are as per our internal compensation policy.	
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.	✓	As per our bullying, harassment and ASB policy	
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.	✓	As per our bullying, harassment and ASB policy	

## 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.	✓	Triage of complaints, and designation of investigating officers is the responsibility of the complaints handling coordinator – more complex complaints are taken to complaints review meetings for a more multidisciplinary approach if required.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	✓	Evidenced by complaints log	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	✓	Evidenced by complaints log	
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	✓	NA – Evidenced by complaints log	

	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.	✓	NA – however tenants are provided with details of the Ombudsman at every stage of the process	
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.	✓	Evidenced by response dates included in complaints log, compared to outstanding actions	
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.	✓	Evidenced by response letters following proforma and template headings	
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.	✓	Evidenced by complaints log and the fact that a new investigator might have been assigned	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	✓	Response letter templates include these headings	

	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.			
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#### 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.	✓	As indicated in the complaints log	
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.	✓	As indicated in the complaints log	
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.	✓	As indicated in the complaints log and evidenced in stage 2 acknowledgment letters	

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	✓	Designated investigating officer at stage 2 is named in acknowledgment letter, so that tenant is aware this will be a different person	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	✓	Timings are logged and monitored through the complaints log	
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.	✓	NA – no extensions have been applied	
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.	✓	NA – however tenants are provided with details of the Ombudsman at every stage of the process	
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.	✓	Evidenced by response dates included in complaints log, compared to outstanding actions	
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.	✓	Evidenced by response letters following proforma and template headings	



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; and 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.	✓	Stage 2 responses involve panel discussions	

#### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision;	✓	Response letters include an outcomes and actions section indicating how we propose to put things right.	

	Amending a record or 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.	✓	As per compensations policy	
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.	✓	As per compensations policy	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	✓	As per compensations policy	

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"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	✓	Report is published on the website and a summary included in the annual report to tenants	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body	✓	Board meeting minutes (May 2025)	

	(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.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	✓	NA	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	✓	NA	
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.	✓	NA	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	✓	MRC report includes a summary of identified patterns and suggestions for improvement.	
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.	✓	Lessons learned log also indicate data analysis and suggestions for service improvement	
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.	✓	Feedback is provided in annual report to tenants and 'you said, we did' sections in newsletters to both staff and tenants	
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.	✓	This responsibility lies with head of governance risk and assurance	
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	✓	MRC identified	

	as the Member Responsible for Complaints ('the 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.	✓	6-monthly reporting to Board	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and annual complaints performance and service improvement report.	✓	MRC attends complaints handling review meetings	
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: 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	✓	This sentiment is reflected in our Ethics, values and behaviours framework.	We foster a culture where discussing concerns leads to transparency and accountability. We ensure that any feedback (including complaints) is handled with care and respect. Feedback of any kind is used as a learning opportunity as well as provides valuable insights into employee sentiment.

	act within the professional standards for engaging with complaints as set by any relevant professional body.			
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