

Appendix A: Self-assessment form

Introduction

The Self-assessment has been completed jointly by our Director of Customer Relations and Member Responsible for Complaints.

The assessment has been reviewed and approved by our SLT / Executive team / Customer Experience Committee and Board.

Once the self-assessment has been approved, this will form part of our annual complaint's performance and service improvement report and will be published on our website alongside our governing body's response to the report.



Linked to the policies in this self-assessment can be found here:

[Equity, Diversity and Inclusion Policy](#)



[Complaints and Compensation Policy](#)


[Unacceptable Behaviour Policy](#)



The icons below are used to show where we meet, partially meet or do not meet the requirements of the code:

	We meet the requirement
	We do not meet the requirement

Section 1: Definition of a complaint



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	 Yes	<p>The Housing Ombudsman’s complaint definition is clearly stated in section 2 of the Complaints and Compensation Policy:</p> <p>“Definitions <i>A complaint is defined as ‘an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’ (The Housing Ombudsman’s Complaint Handling Code).”</i></p>	<p>This is included in our complaints handling training.</p> <p>We carry out annual complaint handling training for all customer facing teams.</p>
1.3	<p>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</p>	 Yes	<p>Section 3 of the Complaints Handling Procedure states:</p> <p>“Important – a customer does not have to say they want to</p>	<p>This is included in our complaints handling training.</p> <p>All complaints are managed by a</p>


	complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.		<p><i>make a complaint for the issue to be dealt with in line with our complaints process. Colleagues should understand the difference between a complaint and a service request."</i></p> <p>Section 6.1 of the Complaints and Compensation Policy states: <i>"A customer does not have to use the word 'complaint' for it to be treated as such."</i></p>	centralised complaint handling team.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	 Yes	<p>This is explained in our policy and procedure and has been embedded in complaints training.</p> <p>Section 3 of our complaints and compensation policy states:</p> <p><i>"A service request is defined as 'a request from a resident to their landlord requiring action to be taken to put</i></p>	<p>This is included in our complaints handling training.</p> <p>We carry out annual complaint handling training for all customer facing teams.</p>



			<i>something right'. (The Housing Ombudsman's Complaint Handling Code). We do not class service requests as complaints."</i>	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	 Yes	We do not stop addressing a service request if the customer complained about our response to their service request. We would work to resolve any issues and deal with the complaint in line with our complaints policy	
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.	 Yes	We use Rant and Rave to collect customer feedback and satisfaction scores for different areas of service, including complaint handling.	

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Section 2: Exclusions



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	 Yes	Exclusions are explained in section 6.3 of our complaints and compensation policy, policy, which also explain that: <i>"We will accept a complaint unless there is a valid reason not to do so"</i>	This is included in our complaints handling training. We carry out annual complaint handling training for all customer facing teams.
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:	 Yes	This is explained in section 6.3 of our complaints and compensation policy under 'exclusions'.	


	<ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	 Yes	Section 6.3 of our complaints and compensation policy states: <i>"We cannot accept complaints in the following circumstances: The complaint relates to something that happened more than 12 months before we received the complaint. We may extend this in exceptional cases, where there were mitigating circumstances"</i>	


			<i>that led to the delay in reporting the complaint”.</i>	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	 Yes	<p>Section 6.3 of our complaints and compensation policy states:</p> <p><i>“We will accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint, we will explain the reason for our decision and provide information about the right to take that decision to the Housing Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, they may tell us to accept the complaint”.</i></p>	<p>We have introduced a complaint refusal letter template that provides details of the Housing Ombudsman Service. This has been added to our complaint handling system.</p> <p>This is included in our complaints handling training.</p> <p>We carry out annual complaint handling training for all customer facing teams.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	 Yes	<p>Section 6.3 of our complaints and compensation policy states:</p> <p><i>“We will deal with all customer complaints fairly and impartially and will consider each complaint on its own merits. We will</i></p>	<p>Our complaints are managed via a centralised complaint resolution team.</p> <p>This is included in our complaints handling training.</p>



			not take a blanket approach to excluding complaints and will always consider the individual circumstances of the customer and their complaint.”	We carry out annual complaint handling training for all customer facing teams.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	 Yes	The various ways in which customers can complain are explained in our Complaints and Compensation Policy, set out in section 6.1 'How to Make a Complaint'.	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	 Yes	This is set out in our Complaints and Compensation policy, set out in section 6.1 "how to make a complaint". The policy specifically states that a complaint can be raised by telling a member of Accent Staff.	This is included in our complaints handling training. We carry out annual complaint handling training for all customer facing teams.



3.3	<p>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.</p>	 Yes	<p>This is explained in our staff training and in our policy wording. Our culture is to see complaints as an opportunity to improve our service delivery and this is embedded in our training to all staff.</p> <p>Section 1 of our complaints and compensation policy states:</p> <p>“We use customer complaints as an opportunity to understand why things go wrong and to improve our services. We encourage customers to use our complaints policy when we get things wrong, and this policy sets out how we will respond to complaints and what we will do to put things right.”</p>	<p>We are monitoring the demographics of customers who make a complaint to ensure that the complaint handling service can be accessed by all our customers.</p> <p>We have introduced a service improvement forum, to capture learning from complaints.</p>
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3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	 Yes	<p>Our policy is published on our website and hard copies are provided to customers on request.</p> <p>Each stage of the process is explained in the policy wording. The accessibility statement on our website explains the following functionality to maximise accessibility for our customers:</p> <ul style="list-style-type: none"> • change colours, contrast levels and fonts using browser or device settings. • zoom in up to 400% without text spilling off the screen. • navigate most of the website using a keyboard or speech recognition software. • navigate most of the website using speech recognition software. • access text to speech with built in access to Browsealoud. 	We reviewed and co-designed our website with customers, which enhanced accessibility.
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			<ul style="list-style-type: none"> Listen to most of the website using a screen reader. 	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	 Yes	<p>This is included in section 1 of our complaints and compensation policy:</p> <p>“The policy can be found on our website, along with information about the Housing Ombudsman Service, the Complaint Handling Code and our self-assessment against the Code. We will provide copies of the of the policy on request.”</p>	We raised awareness of and promoted the complaint handling service in our customer newsletter.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	 Yes	<p>Section 6.2 of our complaints and compensation policy states:</p> <p><i>“We will accept complaints made by a third party on behalf of a customer, but we will check that third party has</i></p>	<p>This is included in our complaints handling training.</p> <p>We carry out annual complaint handling training for all customer facing teams.</p>



			<i>the customer's authority to act on their behalf. Customers may be represented or accompanied at any meeting with us."</i>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	 Yes	Section 7 of our complaints and compensation policy provides information about the Housing Ombudsman service and their contact details	





Section 4: Complaint Handling Staff



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	 Yes	<p>We have a specialised Complaint Resolution team who are responsible for handling all complaints.</p> <p>Our Director of Customer Relations is responsible for complaint oversight and reporting performance to our SLT / Executive Team, Customer Experience Committee and Board.</p> <p>Our Head of Customer Service Improvement is the main contact with the Housing Ombudsman Service.</p>	We completed a review of our complaint handling service in 2024/25 and introduced a new specialist Complaint Resolution Team who investigate our complaints. The team liaise with relevant service leads as part of the process.
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	 Yes	The Head of Customer Service Improvement has access to staff at all levels of the organisation.	



	disputes promptly and fairly.		The Director of Customer Relations provides oversight and reports to SLT / Exec, the Customer Experience Committee and Board.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	 Yes	We have introduced a new Complaint Resolution team to signify the importance of complaint handling. The team work positively with all teams to ensure that we have a positive complaint handling culture. This is included in our complaint handling training.	The new Complaint Resolution Team undertook a full induction training programme.


Section 5: The Complaint Handling Process



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	 Yes	<p>We have one Complaints Policy which covers all customer complaints.</p> <p>Our complaints are investigated and handled by an independent team and our customers are treated fairly and we actively welcome complaints to help improve the services that we deliver.</p>	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	 Yes	<p>Early resolution is not part of our formal complaints process. Separate processes exist for the logging and monitoring of issues that are not considered to be formal complaints.</p>	



5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	 Yes	We have a two-stage process, which is clearly explained in section 6 of our policy.	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	 Yes	Third parties (eg contractors) will be consulted as part of our investigation, where service failure lies with them. This is part of our internal process, and no customers go direct to a third party in line with our Complaint and Compensation Policy and the code.	We have introduced regular complaint meetings with key contractors as part of our complaint handling process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	 Yes	We would handle any complaints relating to a third party (eg contractor) in line with our complaints policy and the Code.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of	 Yes	Complaints handlers are required to speak to customers, so they fully understand the reason	We introduced a quality assurance framework to drive a consistent approach to

	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.		for the complaint. Our template letters have been designed to ensure that our understanding of the customer’s complaint is included in our acknowledgement and response letters	customer care and complaint handing.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	 Yes	All aspects of the complaint are listed in our acknowledgement and response letters and responded to in turn. If any aspect of the complaint is about something that falls outside of our responsibility, this is explained in our correspondence	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or 	 Yes	This is set out in our policy and is trained to colleagues.	

	perceived conflict of interest; and 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.	 Yes	Section 6 of our policy explains that we may need to extend our response timescales in some circumstances, in agreement with the customer.	We have introduced a standard template letter for any complaints that are extended, and this has been added to our complaint handling system. Additional control measures have been introduced to minimise unnecessary extensions.
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	 Yes	We record customers' disabilities/vulnerabilities on our housing management system, along with any adjustments necessary to help them to access our services. These are reviewed in line with our guidance.	Our Customer Data project will increase our knowledge of our customers. We are introducing a new meeting diverse and additional needs policy in 25/26 that will increase how we support our customers.



	must be kept under active review.		<p>In 2024-25 we began a customer data project that will improve information that we hold on our customers.</p> <p>Our complaint handlers are collecting this information when they contact customers regarding their complaint.</p>	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	 Yes	<p>We would not refuse to escalate a complaint unless there was a valid reason to do so as explained in the 'exclusions' section of our policy.</p> <p>We will consider all escalation requests on their own merits and take into account any circumstances that prevented an escalation request within our timescale of 20 working days.</p>	


5.12	<p>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.</p>	 Yes	<p>A record of each complaint is available in our complaints system.</p> <p>This includes a chronological account of the original complaint and all contact/actions at each stage up to case closure. All written correspondence to or from the customer are attached to the complaint and available to download should they be required as evidence. Survey feedback is visible in our complaints report</p>	<p>In 2025-6 we are going to start a procurement for a new CRM & case management solution.</p> <p>This will further strengthen our complaint handling and record keeping.</p>
5.13	<p>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.</p>	 Yes	<p>We encourage case handlers to provide appropriate redress at stage one of our complaints process, so that complaints can be closed efficiently and with the agreement of customers without the need for customers to escalate to stage two of the process to get their desired outcome</p>	<p>This is included in our complaints handling training.</p> <p>We carry out annual complaint handling training for our Complaint Resolution Partners.</p>


5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	 Yes	Our Unacceptable Behaviour Policy is published on our website.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	 Yes	The Unacceptable Behaviour Policy includes the requirement to carry out impact assessments for vulnerable customer in line with the equality Act 2010	



Section 6: Complaints Stages



Stage 1


Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	 Yes	We aim to deal with all complaints as quickly as possible. Where cases are more complex, we will agree an extension with the customer and confirm the extension in writing.	To strengthen our approach Complaint Resolution Partners are reviewing the case as soon as they are raised. We will introduce a triage approach in 25/26.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	 Yes	This is set out in section 6 of our Complaint & Compensation policy. We have introduced a Power Bi reporting suite that assists with the prioritisation and	

			overview of cases that need to be responded to	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	 No	<p>We aim to resolve all stage 1 complaints within 10 working days and this is set out in section 6 of our Complaint & Compensation policy.</p> <p>In 2024-25, some of complaints have taken longer to than 10 working days to resolve and our average days to complete a complaint were at 15.3 days.</p> <p>We identified inconsistencies with the use of extensions as part of complaint handling and this has caused delays in our overall complaint handling times.</p> <p>In quarter four our average days to respond to a complaint reduced to 11.07. This demonstrates an</p>	<p>Whilst our policy is fully aligned with the complaint handling code, our performance in 2024-25 have highlighted areas requiring improvement. Therefore our assessment has determined that we have not fully met this requirement. We have actively implemented measures to address these gaps and enhance our overall compliance.</p> <p>Additional controls measures have been implemented for the use of extensions of complaints to prevent unnecessary complaint extensions.</p> <p>We have a Power-Bi reporting tool that supports our complaint resolution partners to</p>

			improved level of performance as our new complaint resolution team was developed.	manage caseload and has improved oversight and reporting.
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.	 No	<p>Our policy is compliant with the code, we identified inconsistencies with the use of extensions as part of complaint handling and this has caused delays in our overall complaint handling times. Therefore our assessment has determined that we have not fully met this requirement.</p> <p>Colleagues are required to record any agreed extension on the customer's record and confirm in writing.</p> <p>At the end of 2024-25 we added our extension template letter, to our complaint handling system.</p>	<p>In 2025/26 we have introduced improved working practices and are working with key stakeholders prevent complaints from not being responded to on time.</p> <p>Additional controls measures have been implemented for the use of extensions of complaints to prevent unnecessary complaint extensions.</p>


6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	 Yes	<p>Our extension letter template has the information for the Housing Ombudsman set out.</p> <p>The reasons and letters are checked by the Complaint Resolution Managers.</p>	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	 Yes	<p>This is explained in section 6 of our Complaint and Compensation policy</p>	<p>We are developing an improved complaint resolution tracker, and this will be reported to our Senior Leadership team / Executive Team and our Customer Experience Committee from Q2.</p> <p>Resolution actions will be a key requirement added to the requirements for our new complaint handling system that will be procured in 25/26.</p>



6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	 Yes	The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	 Yes	Section 6.3 of our Complaints and Compensation policy states: <i>"Where a customer raises additional issues that are related to the original complaint, we will consider these as part of the stage 1 investigation and include them in the stage 1 response (when the stage 1 response has not already been issued). If the stage 1 response has already been issued, or the new issues raised are unrelated to the original complaint, we will log these as a new complaint".</i>	



6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	 Yes	<p>The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.</p>	
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Stage 2



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	 Yes	<p>This is explained in section 6.4.2 of our Complaints and Compensation policy:</p> <p><i>“The stage 1 response will address all points raised in the complaint and include clear reasons for any decisions. It will provide information for the complainant about how to escalate the complaint if they remain dissatisfied. In these circumstances the complainant should contact us within 20 working days of the response explaining why they remain dissatisfied. We understand that in some cases it may not be possible for a complainant to respond within this timeframe, and we will not refuse to escalate the complaint unless the escalation request relates to one 19</i></p>	
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			<i>of the exclusions explained in this policy.”</i>	
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.	 Yes	Section 6.4.3 of our Complaints and Compensation policy explains: <i>“We will respond to requests for complaints to be escalated to stage two with an acknowledgement, within five working days.”</i>	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	 Yes	Section 6.4.3 of our complaints and compensation policy explains: <i>“It is helpful to understand why a customer is still dissatisfied following our stage 1 response, and what their expectations are in order to resolve the complaint. We will make reasonable efforts to understand why a customer remains unhappy as part of our stage 2 review.”</i>	

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	 Yes	All stage 2 complaints are reviewed by a senior manager or director in line with our Complaint & Compensation Policy	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	 No	<p>We aim to resolve all stage 2 complaints within 20 working days and this is set out in section 6.4.3 of our Complaint & Compensation policy.</p> <p>In 2024-25, some of complaints have taken longer to than 20 working days to resolve and our average days to complete a complaint were at 28 days.</p> <p>We identified inconsistencies with the use of extensions as part of complaint handling and this has caused delays in our overall complaint handling times.</p> <p>While we have not consistently met the</p>	<p>Whilst our policy is fully aligned with the complaint handling code, our performance in 2024-25 have highlighted areas requiring improvement. Therefore our assessment has determined that we have not fully met this requirement. We have actively implemented measures to address these gaps and enhance our overall compliance.</p> <p>Additional controls measures have been implemented for the use of extensions of complaints to prevent unnecessary complaint extensions.</p>


			complaint handling response time, our focus on resolving complaints at stage 2 has significantly improved. In Q4 we saw a 89% reduction in cases escalating to the Housing Ombudsman compared to Q1.	We have a Power-Bi reporting tool that supports our complaint resolution partners to manage caseload and has improved oversight and reporting.
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.	 No	<p>Our policy is compliant with the code, we identified inconsistencies with the use of extensions as part of complaint handling and this has caused delays in our overall complaint handling times. Therefore our assessment has determined that we have not fully met this requirement.</p> <p>Colleagues are required to record any agreed extension on the customer's record and confirm in writing.</p>	<p>In 2025/26 we have introduced improved working practices and are working with key stakeholders prevent complaints from not being responded to on time.</p> <p>Additional controls measures have been implemented for the use of extensions of complaints to prevent unnecessary complaint extensions.</p>



			At the end of 2024-25 we added our extension template letter, to our complaint handling system.	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	 Yes	We have developed a standard letter template that has the information for the Housing Ombudsman set out. This has been added to our complaint handling system.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	 Yes	<p>Section 6.5 of our complaints and compensation policy explains</p> <p><i>“A complaint will be closed:</i></p> <ul style="list-style-type: none"> <i>• When the resolution is agreed with the complainant and our commitment to deliver the action has been made and accepted by the complainant and the response to the complaint is issued. The response will provide advice for referring the</i> 	<p>We are developing an improved complaint resolution tracker, and this will be reported to our Senior Leadership team / Executive Team and our Customer Experience Committee from Q2.</p> <p>Resolution actions will be a key requirement added to the requirements for our new complaint handling system that</p>


			<i>complaint to the Housing Ombudsman Service if the complainant remains dissatisfied; or</i> <i>• If the complainant decides to voluntarily to withdraw their complaint.”</i>	will be procured in 25/26.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	 Yes	The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	 Yes	The wording of our response letters has been designed to ensure we cover all points raised in the complaint and the reason for any decisions	

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	 Yes	<p>The stage 2 review is overseen by the relevant Head of Service or Director and will include a review of the stage response with relevant members of staff.</p>	


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; 	 Yes	<p>This is part of our established policy and procedure, and we have templates to ensure that each point is considered and included in our responses</p>	


	<ul style="list-style-type: none"> • 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. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	 Yes	This is explained in our response letters. Any remedy offered will be explained in relation to the service failure(s) and impact on the customer	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	 Yes	This is part of our established policy and procedure, and we have templates to ensure that each point is considered and included in our responses	In 2025-2026 we are going to start a procurement for a new CRM & case management solution. This will further strengthen our complaint resolution

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	 Yes	We follow HOS remedies guidance when assessing appropriate remedies	We review Housing Ombudsman reports in our Service Improvement Forum We carry out spotlight reports and monitor the progress of these.
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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; 	 Yes	<p>Our annual report will include all elements set out in the requirements.</p> <p>We have introduced new recording measures to capture complaints that are refused.</p>	



	<p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
8.2	<p>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.</p>	 Yes	<p>The annual complaints performance and service improvement report is reported to the Customer Experience Committee and Board and published on our website along with the governing body's response</p>	
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	 Yes	<p>A review would be conducted following significant change.</p>	<p>We have carried out a review of the Self-Assessment following the introduction of the centralised complaint handling service.</p>
8.4	<p>Landlords may be asked to review and update the self-assessment following</p>	 Yes	<p>We will comply with any orders or recommendations from the Ombudsman.</p>	


	an Ombudsman investigation.			
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	 Yes	We have a disaster recovery plan in place, which provides guidance on supporting vulnerable customers. Should any exceptional circumstances arise which affects our customers and our compliance with the Code, we will keep our customers, and the Housing Ombudsman Service informed	


Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	 Yes	<p>We have introduced a Service Improvement forum that is looking at root cause and use findings to apply learning.</p> <p>We have a dedicated Customer Champion who is a member of the Service Improvement Forum.</p> <p>These are included in reports to the Senior Leadership team / Executive Team and Customer Experience Committee and identify learning that may lead to changes in the policy, procedure or working practices.</p>	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must	 Yes	A positive complaint handling culture is embedded in our policy, procedure and working practices. This is included	We have developed a new Complaint Insight Power-Bi dashboard

	use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		in our complaints handling training module. We use complaints data to identify trends and include these in reports to our Executive Team and Customer Experience Committee, including recommendations for changes as a result of learning from complaints	that will strengthen our approach. In 2025-2026 we are going to start a procurement for a new CRM & case management solution. This will further strengthen our complaint resolution
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	 Yes	We identify root causes and use findings to assess whether there are any systemic issues These are included in reports to the Executive Team and Customer Experience Committee and identify learning that may lead to changes in policy, procedure or working practices.	
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	 Yes	In April 2024, we appointed a Director of Customer Relations.	To support this, we have appointed a Head of Customer Service Improvement in October 2024.

	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 ('the MRC').	 Yes	Our Member Responsible for Complaints is Helen Jaggar who is a Board member and is the Chair of the Customer Experience Committee	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	 Yes	Our Member Responsible for Complaints receives regular updates on complaint handling performance through their role as Chair of the Customer Experience Committee and Board Member duties. They are provided with access to information to enable them to perform this role and report on their findings.	

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 findings; and d. annual complaints performance and service improvement report. 	<div data-bbox="891 730 958 799"></div> <p>Yes</p>	<p>Quarterly reports are submitted to the Customer Experience Committee which includes complaints volumes, complaint categories and complaint handling performance. An update on outcomes from Ombudsman investigations is included along with cases studies, lessons learned and changes to working practices as a result of complaints.</p> <p>We produce a Performance Reporting Framework (PRF) that highlights our complaint handling performance and this is supported with operational updates.</p> <p>Our Member Responsible for Complaints oversees the development of annual complaints performance and improvement report.</p>	
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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; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	 <p>Yes</p>	<p>In June 2024 we introduced a standard complaint objective for all colleagues and this is reviewed as part of our performance management framework.</p>	