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# Self-assessment against the Housing Ombudsman Service's Complaints Handling Code 2024-25

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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.



**Elmbridge**  
Borough Council

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## Self-assessment against the Housing Ombudsman Service's Complaints Handling Code

## 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>	YES	Elmbridge Borough Council's (EBC) Residential Properties Complaint Handling Policy page 3 which can be found on our website.	We have adopted the Housing Ombudsman's definition of a Complaint in our Complaints Policy.
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.	YES	EBC Complaint Handling Policy page 3 & 5	Our complaints policy details how we will deal with a tenant's expression of dissatisfaction. Complaints are accepted via third parties.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	EBC Complaint Handling Policy pages 4 & 5.	Updated training provided to tenant facing EBC teams (July 2025).
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	EBC Complaint Handling Policy page 5	Training has been provided to Tenant facing EBC teams.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though	YES	When we carry out surveys Our Team is briefed to make tenants aware that they can make a	Part of our TSM survey that our Managing Agent delivers for us has information for

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		complaint.	tenants on making a complaint.

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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	EBC Complaint Handling Policy details the exceptions page 5 & 6	We will provide the reason why and the action a tenant can take, including approaching the Housing Ombudsman Service once our decision is received.
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</li> </ul>	YES	EBC Complaint Handling Policy details the exception page 5 & 6	Exceptions are detailed along with how it will be communicated to the tenant.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	EBC Complaint Handling Policy Page 6	Training has been provided to Tenant facing EBC teams.
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	YES	EBC Complaint Handling Policy Page 5 & 6	EBC Housing team briefed on this and now have a template to clearly explain what the resident can do if they disagree. This details the Housing Ombudsman

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	the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			contact.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	EBC Complaint Handling Policy page 5	We review each complaint on its own merit. EBC Housing team briefed on this.



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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	Complaint Handling Policy Page 2, 3, 6 & 9. Making it clear that tenants can complain to the Managing Agent and EBC and how to do so. Tenants can request for reasonable adjustments when providing feedback to us.	Briefing provided to EBC tenant facing teams  Tenants can complain over the phone, website, via email or through letter to either the Managing Agent or EBC.
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	Complaint Handling Policy Page 3 & 6	Brief provided to EBC tenant facing teams

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	YES		Complaints are promoted as positive and welcomed.
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	Complaint Handling Policy available on our website at: <a href="https://elmbridge.gov.uk/housing/council-tenants-new-managing-agents">https://elmbridge.gov.uk/housing/council-tenants-new-managing-agents</a>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman	YES	Complaint Handling Policy Page 2, 6 & 8	

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.	YES	Complaint Handling Policy Page 5	
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	Complaint Handling Policy, Website & Correspondence with Tenants	We capture this through all templates in the complaints process.

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## 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	The Housing Team is responsible for handling complaints, with the Head of Housing accountable for complaints, working with the Managing Agent who delivers most of the services received by our tenants. Details are set out in the Complaint Handling Policy Page 3 & 4.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	YES	Training has been provided to Tenant facing EBC teams.	The Housing Team are empowered to act quickly and fairly including the authority to make compensation payments.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaint handling training has been provided to Tenant Facing teams, as well as briefings to Customer Services and Senior Managers.	

## 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	A single complaints policy is in place.	Our Managing Agent has a single policy in place.
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	We clearly define the stages of our complaint procedure in our complaint handling policy. We do not have an informal stage.	
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	Our complaint handling policy is a two-stage process Pages 6-8.	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor	YES	Our Complaint Handling policy pages 2-3 clearly states that	

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		tenants only go through one complaint process either with us or the Managing Agent.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	<p>Our Managing Agent handles most of our complaints and we review compliance through their policy, self-assessment and contract monitoring meetings.</p> <p>We review and agree stage 2 responses provided by our Managing Agent before they are sent to our tenants. Complaint Handling Policy page 3.</p>	
5.6	When a complaint is logged at Stage 1 or	YES	When acknowledging complaints	

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		at stage one and two, we summarise our understanding in writing, giving tenants the opportunity to highlight if something is misunderstood.	
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	In our communication and responses to tenants, we set out what we are and are not responsible for. Complaint Handling Policy Page 6.	
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</li> </ul>	YES	The Housing Team responsible for complaints have been trained to ensure appropriate complaint handling skills are in place. This includes dealing with complaints on its merits, acting independently and with an open mind.	



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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			
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	The Team has been briefed on the importance of keeping tenants informed. This is part of our Complaint Handling Policy Page 7.	
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	YES	We will talk to our tenants to understand their individual needs. Record on our complaints log and IT systems. Complaints Handling Policy Page 9.	Our Managing Agent records Disabilities and Vulnerabilities, where known, and reasonable adjustments are currently recorded on their IT system.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	YES	Our reasons for not accepting a complaint are outlined in our Complaint Handling policy. This list is not exhaustive, and each case will be looked at on its own merit.	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	YES	We use a dedicated logging system for complaints and relevant details of each case are kept.	

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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.	YES	Complaint Handling Policy	Our complaint handling policy outlines our approach to solutions. Through training, we help complaint handlers identify a satisfactory resolution from the start.
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	Complaint Handling Policy	We have detailed what we will do if there is unacceptable behaviour in our Complaint Handling Policy and the actions we will take.
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	Reasonable Adjustments in the Complaint Handling Policy.	Our policy ensures that any restrictions put in place are done so in regard for the provisions of the Equality Act 2010 to ensure they are reasonable and proportionate.

## 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	Complaint Handling Policy and Complaint Handling Briefings July 2025.	All complaints are assessed to understand what is required to fully consider the issues and resolutions. The officer dealing with the complaint will seek to identify any vulnerabilities and risk during first contact with tenant in line with our Complaint Handling Policy.
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	Complaint Handling Policy Page 6	Our policy complies with the Housing Ombudsman Code.
6.3	Landlords must issue a full response to	YES	Complaint Handling Policy Page 7	Our policy complies with the

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.			Housing Ombudsman Code.
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.	YES	Complaint Handling Policy Page 9	
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	Contact details of the Housing Ombudsman are included in letters confirming the extension of the timescale.	
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	YES	Complaint Handling Policy page 7	Complaints responses are issued when the plan of action is known. We track the outstanding actions through

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			our complaint monitoring system to ensure the follow up actions take place.
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	Complaint Handling Policy page 7	Guidance has been provided to the complaint handlers to ensure a full response is given.
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	Complaint Handling Policy page 7	We will add additional complaints to the Stage 1 response unless we have already responded or it would delay further the response. Where this is the case, we will log it as a new complaint.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	YES	Complaint Handling Policy page 7	This is set out in the Complaints letter templates to give guidance and ensure all points are addressed.

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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.	YES	Complaint Handling Policy page 7	Complaints are escalated to stage 2 if the resident remains dissatisfied with the outcome at stage 1.
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	Complaint Handling Policy page 7	
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	Complaint Handling Policy page 7	We do not require an explanation of the reasons for requesting a stage 2, but we will work with the tenant to understand their response for remaining unhappy.



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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	Complaint Handling Policy page 8	Stage 2 responses are reviewed by the Head of Housing
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	YES	Complaint Handling Policy page 8	Our policy complies with the Housing Ombudsman Code.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	YES	Complaint Handling Policy Page 9	
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	Contact details of the Housing Ombudsman are included in letters confirming the extension of the timescale.	

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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	Complaint Handling Policy page	Complaints responses are issued when the plan of action is known. We track the outstanding actions through our complaint monitoring system to ensure the follow up actions take place.
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	Complaint Handling Policy page 7	Guidance has been provided to the complaint handlers to ensure a full response is given.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> </ul>	YES	Complaint Handling Policy page 7	This is set out in the Complaints letter templates to give guidance and ensure all points are addressed.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	YES	Complaint Handling Briefings July 2025.	

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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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a</li> </ul>	YES	Training with Complaint Handlers on resolving complaints July 2025	In our responses to tenants, our template guides complaint handlers to ensure we apologise, acknowledge where things went wrong, say what we will do to fix the problem where lessons have been learnt, and improvements made where applicable. Our policy states where compensation is offered, we do so in line with the Housing Ombudsman approach.

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>correction or addendum;</p> <ul style="list-style-type: none"> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Training with Complaint Handlers on resolving complaints July 2025	The impact of the tenant is considered as part of the complaint response and any remedies are considered and offered, in line with the Complaint Handling 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.	YES	Complaint Handling Policy	We send a response as soon as we know the outcome of the complaint. The response will include the action plan for any remaining actions with expected completion dates. Offer of compensation in a

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				response will detail the next steps, if the tenant wishes to accept the offer
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	Training with Complaint Handlers on resolving complaints July 2025	The Housing Ombudsman remedies guidance is referred to in the Complaint Handling Policy.

## Section 8: Putting things right

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>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> </ul>	YES	Complaints performance and service improvement report is being produced alongside this self-assessment	

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	<p>d. the service improvements made as a result of the learning from complaints;</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	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	YES	Complaints performance and service improvement report is being produced and will be shared with our governing body.	From September 2025, our governing body's response to the report will also be published alongside this.



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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	This will take place annually and has also taken place alongside our change to our Managing Agents or other significant changes such as local government re organisation.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES		We will fully comply should this arise.
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	There have been no significant issues as outlined and we have been able to comply with the Code.	

## 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	Our contract monitoring with our Managing Agent and annual complaints performance and service improvement report identifies these and gives us the opportunity to consider wider service improvements.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	YES	We will use insights from our complaints to improve services alongside the Managing Agent.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from	YES	Annual Report on Complaint Handling	Reporting on Complaints and learning from complaints have been be shared with Members and servicing

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaints to stakeholders, such as residents' panels, staff and relevant committees.			officers.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	YES	The Head of Housing is the lead person accountable.	
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	The Portfolio Holder for Housing is the MRC	

## Self-assessment against the Housing Ombudsman Service's Complaints Handling Code

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	The MRC has access to the relevant staff to perform the role.	The MRC has received Briefing / Training on this role and responsibilities.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes</li> </ul>	YES	We have put a structure in place for regular updates to be provided and this includes any outcomes of HOS being made available at the time.	

## Self-assessment against the Housing Ombudsman Service's Complaints Handling Code

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming</p>	YES	Included for relevant staff objectives.	Relevant staff objectives will continue to reflect on the importance of effective complaint handling. These objectives will emphasise collaborative working, shared accountability, and professional standards, ensuring colleagues work together to resolve issues, take collective responsibility for service failings, and engage constructively with

### Self-assessment against the Housing Ombudsman Service's Complaints Handling Code

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			residents and one another.