

## Stockport Homes Group's Self-Assessment Against the Housing Ombudsman's Complaint Handling Code – June 2025

As a member landlord of the Housing Ombudsman Scheme (HOS), Stockport Homes Group (SHG) are required to undertake self-assessment against the HOS' revised Complaint Handling Code, which became statutory on 1st April 2024.

The HOS have provided landlords with a self-assessment form, to check that they are compliant with the Code. In accordance with the requirements of the Code, the Self-Assessment has been submitted to SHG's Board via the Customer Focus Committee and approved by them as indicated in the minutes of the meeting on 11 August 2025.

Customer Focus Committee reviewed and commented on the details of the report and the self-assessment and approved the self-assessment ahead of submission to the Housing Ombudsman Service

*The Customer Focus Committee reviewed and commented on the details of the report and the self-assessment, and approved the self-assessment ahead of submission to the HOS.*

Full minutes of the meeting will be available, once approved at the August 2025 meeting, via the following link: [Board Meetings - Stockport Homes](#)

A copy of SHG's completed and approved Self-Assessment form is provided below.

**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              | Customer Feedback Policy  | This definition has been adopted verbatim as set out in the Customer Feedback Policy, paragraph 3.1.   |
| 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 complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>                             | Yes              | Customer Feedback Policy  | As set out in the Customer Feedback Policy, paragraph 3.3  |
| 1.4            | <p>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.</p> | Yes              | Customer Feedback Policy, and Year End Customer Feedback Report | Approach to handling Service Requests set out in Customer Feedback Policy, paragraph 3.5. Reporting of Service Requests provided to Leadership and Board through Customer Feedback Report. |

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| 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 | Customer Feedback Policy                  | Approach to handling Service Requests and formal complaints set out in Customer Feedback Policy, paragraph 3.5   |
| 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 | Example Transactional Satisfaction Survey | Transactional surveys undertaken by SHG include explanation that responses to surveys are not recorded formally, and signposts to how to make a compliment or complaint via webform (hyperlink), phone or email. Approach set out in 3.7 of Customer Feedback Policy |

## Section 2: Exclusions

| Code provision | Code requirement   | Comply: Yes / No | Evidence                 | Commentary / explanation   |
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| 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              | Customer Feedback Policy | Approach set out in paragraph 3.8, Customer Feedback Team will write to customer to explain where complaint not accepted and why |
| 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> | Yes              | Customer Feedback Policy | Exclusions detailed in paragraph 3.7, which are in accordance with HOS Code  |
| 2.3            | Landlords must accept complaints referred to them within 12 months of  | Yes              | Customer Feedback Policy | Detailed in paragraph 3.7  |

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|     | 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.   |     |   |  |
| 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 | Customer Feedback Policy and example communication with customer. | Detailed in paragraphs 3.7 and 3.8 of the Customer Feedback Policy. Centralised Customer Feedback Team manage all decisions around accepting and refusing complaints and manage all communications on this. Officers are trained in accordance with Policy. Example complaint refusal is provided, demonstrating compliance. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | Customer Feedback Policy  | Detailed in paragraph 3.7 with reference to considering individual circumstances of each complaint.  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 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              | Customer Feedback Policy                         | Multiple channels of making a complaint are detailed in paragraph 3.2, along with detail of commitment to reasonable adjustments being made relating to access to complaints process. Training has been provided to Customer Feedback Officers regarding awareness of Equality Act and reasonable adjustment. |
| 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              | Training Module                                  | Training is provided to all front-line customer facing roles, to ensure all staff are able to recognise a formal complaint and know how to effectively handle this, through quick resolution where appropriate or through obtaining relevant details and passing through to Customer Feedback Team.           |
| 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  | Yes              | Quarterly and Year End Customer Feedback Reports | Reporting to Leadership and Board includes analysis of complaints volumes and drivers, including commentary where volumes are decreasing and benchmarking against   |

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|     | sign that residents are unable to complain.  |     |  | sector to provide context and assurance on accessibility of complaints process. Analysis of customer profiles is undertaken to determine if any groups are underrepresented which may point to barriers in accessing the complaints process.   |
| 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 | Customer Feedback Policy and webpage ( <a href="https://www.stockporthomes.org/about-us/our-performance/complaints/">https://www.stockporthomes.org/about-us/our-performance/complaints/</a> ) | The Customer Feedback Policy can be viewed and downloaded from the SHG website in digital format. Specific information relating to the two stages and associated timescales are provided on the website and can be accessed via use of the website's range of accessibility functions (such as larger text, text to audio, colour preferences, language translations). |
| 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 | Customer Feedback Policy   | Detailed in paragraph 2.9 – published on SHG website   |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or   | Yes | Customer Feedback Policy   | Detailed in section 10, includes reference to use of representative as a reasonable adjustment   |

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|     | accompanied at any meeting with the landlord.  |     |   |   |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. | Yes | See Customer Feedback page on SHG website ( <a href="https://www.stockporthomes.org/about-us/our-performance/complaints/">https://www.stockporthomes.org/about-us/our-performance/complaints/</a> ) and formal communication templates. | Detailed in all formal communications with complainants at all stages – acknowledgements and formal responses, including wording taken from HOS guidance to landlords |

## 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              | Customer Feedback Report | SHG operates a centralised Customer Feedback Team with designated Customer Feedback Officers, who are responsible for complaint handling, and a Complaints Manager who is responsible for liaison with the Ombudsman and reporting to Leadership and Board.   |
| 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              | Compensation Policy      | As set out in the Compensation Policy, Customer Feedback Officers are empowered to make autonomous decisions relating to complaint resolution and remedy up to a moderate value (£100) without need for consultation. Officers have continuous access to service areas managers who are able to quickly approve remedies up to the value of £500. |
| 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  | Yes              | Customer Feedback Report | Specialist Customer Feedback Team in place. All relevant staff who are involved in complaint handling across the organisation receive training via the Litmos training portal, with   |

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|  | <p>that complaints are seen as a core service and must be resourced to handle complaints effectively</p> |  |  | <p>effective complaint handling principles taken from HOS training resources for landlords. Customer Feedback Officers have completed the HOS' training on effective complaint handling. The Customer Feedback Report evidences a positive and effective complaint handling culture, including performance of complaint handling providing assurance on appropriate levels of resource.</p> |
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## 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              | Customer Feedback Policy | SHG operate one single policy which covers all complaints received by the organisation, including all within the remit of the HOS and their Code. As per section 2 of the Customer Feedback Policy.                                 |
| 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              | Customer Feedback Policy | SHG operates a two-stage approach, as set out in the Customer Feedback Policy, section 4.   |
| 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              | Customer Feedback Policy | SHG operates a two-stage approach, as set out in the Customer Feedback Policy, section 4.   |
| 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 | Yes              | Customer Feedback Policy | SHG does not utilise third parties in complaint handling, operating a centralised Customer Feedback Team, with internal staff being responsible for handling and investigation of complaints at all stages, irrespective of where a |

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|     | complaints processes.  |     |                                      | contractor or third party working on behalf of SHG may be the subject of the complaint.   |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | Customer Feedback Policy             | SHG does not utilise third parties in complaint handling, operating a centralised Customer Feedback Team, with internal staff being responsible for handling and investigation of complaints at all stages, irrespective of where a contractor or third party working on behalf of SHG may be the subject of the complaint. |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | Example of complaint acknowledgement | SHG utilise a complaint acknowledgement template, based upon the HOS’ example template, which sets out definition/scope of complaint and provides opportunity for resident to clarify and/or amend the definition if unclear or not agreed.   |
| 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 | Example of complaint acknowledgement | SHG utilise a complaint acknowledgement template, based upon the HOS’ example template, which sets out definition/scope of complaint and provides opportunity for resident to clarify and/or amend  |

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|      |   |     |                          | the definition if unclear or not agreed.   |
| 5.8  | At each stage of the complaints process, complaint handlers must: deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. | Yes | Customer Feedback Policy | Customer Feedback Officers are trained to ensure this process is followed. This is also set out in the Customer Feedback Policy, paragraph 3.12  |
| 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 | Customer Feedback Policy | As set out in paragraph 4.4 which details that we will agree update intervals in instances where not responding within timescales set out in the Code.   |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.                                  | Yes | Customer Feedback Policy | As set out in the Customer Feedback Policy, section 10. Customer Feedback Officers are trained to understand responsibilities relating to reasonable adjustment in accordance with the Equality Act. |
| 5.11 | Landlords must not refuse to escalate a complaint through all   | Yes | Customer Feedback Policy | As set out in the Customer Feedback Policy paragraph 3.7,  |

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|      | 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.   |     |  | which adopts the Code's language on this.  |
| 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 | Customer Feedback Policy   | As set out in the Customer Feedback Policy paragraph 3.11. All relevant records and documents are recorded across Civica CX and Customer Feedback SharePoint site and retained in accordance with GDPR                         |
| 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 | See Compensation Policy  | The Compensation Policy empowers small remedies by all staff across the organisation. Customer Feedback Officers and other staff involved in responding to complaints are empowered to find resolution up to higher values     |
| 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  | Yes | Customer Feedback Policy and Unacceptable Behaviour Policy and Procedure | The Customer Feedback Policy sets out its link to the Unacceptable Behaviour Policy at paragraph 2.5, and that complaints may be refused if accompanied by unacceptable behaviour at paragraph 3.6. The Unacceptable Behaviour |

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|      | keep restrictions under regular review.  |     |                                   | Procedure sets out approach to managing unacceptable behaviour, including evidencing this, and ensuring any restrictions are subject to review (paragraph 8.3)   |
| 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 | See Unacceptable Behaviour Policy | As set out in the Unacceptable Behaviour Policy, paragraphs 3.3 and 3.4, staff are required to take into account any underlying vulnerabilities and disabilities when making decisions around restrictions linked to unacceptable behaviour. |

## 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              | Customer Feedback Policy | SHG operates a centralised Customer Feedback Team who receive all complaints for the organisation. Upon receipt Officers triage cases based upon case details, customer profile and through engagement with the customer to understand where quick resolution is possible. Where agreed with the customer and in accordance with the Code, this may be handled as a Service Request within 5 working days, as set out in paragraph 3.5. |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.   | Yes              | Customer Feedback Policy | Upon receipt, contacts are recorded on the Civica CX system which tracks to ensure complaint acknowledgements (where accepted) are sent within five working days. This timescale is set out in the Customer Feedback policy, paragraph 3.10.  |

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| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.  | Yes | Customer Feedback Policy           | Timescales for Stage 1 complaints are set out in the Customer Feedback Policy paragraph 4.1. This is managed through the Civica CX system, and reported as part of the Tenant Satisfaction Measures   |
| 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 | Customer Feedback Policy           | Timescales for Stage 1 complaints and escalations are set out in the Customer Feedback Policy paragraph 4.1. This is managed through the Civica CX system, and reported as part of the Tenant Satisfaction Measures   |
| 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 | Example of extension communication | The Customer Feedback Team manage all decisions relating to complaint extensions. Where extensions are applied to complaints at all stages, correspondence is sent to the customer to explain this, providing contact details for the Ombudsman. As set out in paragraph 3.8 of the Customer Feedback Policy. |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known,  | Yes | Actions and Learning Planner       | The centralised Customer Feedback Team ensure that complaint responses go out   |

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|     | 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.   |     |                             | when the answer to the complaint is known and track any post-hoc actions related to the complaint via the 'Actions and Learning' Planner.   |
| 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 | Example of Stage 1 response | Customer Feedback Officers undertake quality assurance checks of complaint responses to ensure the inclusion of relevant policy, law, and good practice where appropriate.  |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes |                             | Customer Feedback Officers ensure that all substantive issues of a complaint are addressed, including where customers raise additional substantive issues either within scope of the existing complaint where this is appropriate, or otherwise as a new complaint. As set out in section 4.5 of the Customer Feedback Policy |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;   | Yes | Customer Feedback Procedure | As set out in the Customer Feedback Procedure, paragraph 3.13 which uses same definition/wording as HOS Code.   |

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|  | <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p> |  |  |  |
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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              | Customer Feedback Policy and Procedure | The Customer Feedback Procedure, section 5, sets out that all Stage 2 escalation requests will be accepted unless excluded as per paragraph 3.6 of the Policy.                   |
| 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              | Customer Feedback Policy               | The Customer Feedback Policy paragraph 3.9 sets out that complaints at all stages are acknowledged within five working days.   |
| 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                     | Yes              | Customer Feedback Policy and Procedure | The Customer Feedback Procedure sets out customers will be asked why they remain unhappy and what outcome they are seeking, but that the Stage 2 request will be accepted unless |

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|      | remains unhappy as part of its stage 2 response.  |     |  | meets exemptions as per paragraph 3.7 of the Policy. Where customers do not set out why they remain unhappy or their sought outcome, this is not a reason to refuse the complaint at either stage. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | Customer Feedback Policy                                       | As per the Customer Feedback Policy paragraph 4.2, Stage 2 complaints are heard by a manager, usually more senior than Stage 1 responder and not the same person as responded at Stage 1.          |
| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.  | Yes | Customer Feedback Policy                                       | As per the Customer Feedback Policy paragraph 4.2.   |
| 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 | Customer Feedback Policy                                       | As per the Customer Feedback Policy paragraph 4.2 which sets out timescales for extensions where this is agreed and communicated to customers.   |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided   | Yes | Customer Feedback Policy and Example communication to customer | The Customer Feedback Team manage all decisions relating to complaint extensions. Where extensions are applied to  |

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|      | with the contact details of the Ombudsman.  |     |                              | complaints at all stages, correspondence is sent to the customer to explain this, providing contact details for the Ombudsman. This is set out in paragraph 4.3 of the Customer Feedback Policy.                        |
| 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 | Actions and Learning Planner | The centralised Customer Feedback Team ensure that complaint responses go out when the answer to the complaint is known and track any post-hoc actions related to the complaint via the 'Actions and Learning' Planner. |
| 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 | Stage 2 response example     | Customer Feedback Officers undertake quality assurance checks of complaint responses to ensure the inclusion of relevant policy, law, and good practice where appropriate.  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; | Yes | Customer Feedback Policy     | As set out in the Customer Feedback Policy at paragraph 3.13, which sets out what will be included in formal complaint responses.   |

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|      | 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. | Yes | Customer Feedback Policy | As set in the Customer Feedback Policy paragraph 4.2, Stage 2 complaints are investigated by senior managers. The Customer Feedback Team review Stage 2 responses and have opportunity to discuss with the Head of Customer Voice and Complaints Manager at weekly meetings to ensure final responses are appropriate. |

## 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 correction or addendum.</li> <li>• Providing a financial remedy.</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes              | Customer Feedback Policy | As set out in the Customer Feedback Policy paragraph 5.2, which details remedies as per the Code.  |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | Compensation Procedure   | As per the Compensation Procedure paragraph 1.2, remedies reflect the impact upon individual customers taking into account their personal circumstances. |
| 7.3            | The remedy offer must clearly set out what will happen and by when,  | Yes              | Customer Feedback Policy | As set out in the Customer Feedback Policy, paragraph 5.2  |

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|     | in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. |     |                        | and 5.3, remedies are set out in complaint responses along with expected timescales. These are tracked via the 'Actions and Learning' process by the Customer Feedback Team to ensure completion. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.    | Yes | Compensation Procedure | The Compensation Procedure is reviewed regularly to ensure that it reflects current Ombudsman guidance on remedies.   |

## 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> | Yes              | Customer Feedback Report | A quarterly Customer Feedback Report provides analysis and commentary for these elements. The report provides details of complaints which have been refused during the reporting period, the type of complaints which have been refused and the reasons. |
| 8.2            | The annual complaints performance and service improvement report   | Yes              | Customer Feedback Report | The Customer Feedback Report is reported on a quarterly basis  |

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|     | <p>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>  |     |  | <p>to the Executive Leadership Team and Customer Focus Committee (Board), and published annually to the website. The Board's response to the report will be published alongside this as of 2024/25 Year End Report.</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>Noted with Assurance Team in case of future point of compliance by exception.</p>  |
| 8.4 | <p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>   | Yes |  | <p>Noted, subject to HOS instruction.</p>   |
| 8.5 | <p>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<br/>Landlords must provide a timescale for returning to compliance with the Code.</p> | Yes |  | <p>Noted with Assurance Team in case of future point of compliance by exception.</p>  |

## 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              | Customer Feedback Report | The Customer Feedback Report details analysis of trends and application of learning from individual complaints to review processes. The Customer Feedback Team undertake reviews of processes and service delivery based upon customer feedback.  |
| 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              | Customer Feedback Report | The Customer Feedback Report details analysis of trends and application of learning from individual complaints to review processes. The Customer Feedback Team undertake reviews of processes and service delivery based upon customer feedback.  |
| 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              | Customer Feedback Report | The Customer Feedback Report is presented to Customer Focus Committee which comprises Board members including customers (quarterly) and relevant Council Scrutiny Committee (annually), which involves scrutiny from elected Council members as an Arms-Length Management Organisation. The Complaints Manager meets on a regular basis |

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|     |  |     |                          | with senior managers within service areas to discuss learning from complaints and instigate service improvements.  |
| 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 | Customer Feedback Report | The Assistant Director - Customer Excellence is designated as the lead person accountable for complaint handling, being responsible for the Head of Customer Voice, Complaints Manager and Customer Feedback Team. The Assistant Director Customer Excellence reviews and signs off the Customer Feedback Report and maintains day-to-day operational oversight of issues arising from complaints. |
| 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 chair of the Customer Focus Committee (subset of Board) has been designated as 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  | Yes |                          | As chair of the Customer Focus Committee, the MRC receives quarterly Customer Feedback Reports. The Complaints Manager reports to the Committee in person, with comments and   |

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|     | have access to suitable information and staff to perform this role and report on their findings.  |               |                          | actions from the meeting minutes and published.  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>regular reviews of issues and trends arising from complaint handling;<br>regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and<br>annual complaints performance and service improvement report. | Yes           | Customer Feedback Report | A detailed report is provided to the MRC on a quarterly basis, with this presented by the Complaints Manager on a regular (quarterly) basis. This includes details on Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings, and service improvements following complaints. |
| 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:<br>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;<br>take collective responsibility for any shortfalls identified through   | Yes - ongoing | Training Module          | This objective is set out in training delivered to all relevant colleagues across the organisation, including front-line customer facing roles and managers involved in complaint handling.  |

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|  | complaints, rather than blaming others; and act within the professional standards for engaging with complaints as set by any relevant professional body. |  |  |  |
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