

Housing Ombudsman Complaint Handling Code 2026

Self-assessment September 2026

Evidence is provided for each element of the Code, but commentaries / explanations are only provided where they are needed to clarify points of evidence, or to explain what steps we are taking to become compliant. Actions are highlighted and contained within our Complaints Improvement Plan.

RAG key:	Compliant with appropriate assurance	Compliant but further assurance needed	Not compliant and/or significant assurance gaps
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Section 1: Definition of a complaint

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy (3.5)</u> Complaints Procedure (1.6) Staff training materials: - CRS Training May 2024, Page 5) - Introduction to the Complaints and Resolution Team 2025, Page 5	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Staff training materials detail a compliant definition of a complaint.	



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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	<u>Complaints Policy (3.7)</u> Complaints Procedure (1.2, 2.1) Staff training materials: CRS Training May 2024, Page 5)	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Staff training materials specify the word 'complaint' is not required to be considered as one. Complaints can be raised by a third party where consent from the complainant is provided to support residents in raising a complaint. Implementation of a system change ensured data is collated to identify and report on third party complaints since 2024.	
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	Yes	<u>Complaints Policy (3.1, 3.4, Section 4)</u> Complaints Procedure (1.6, 2.5, Appendix 1) Staff training materials:	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Staff training materials define a service request and complaint, and states service requests are	

	action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		CRS Training May 2024, Page 5)	recorded, monitored and reviewed.	
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	<u>Complaints Policy</u> (3.2, 3.3) Complaints Procedure (1.6) Staff training materials: CRS Training May 2024, Page 5)	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards.	
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	Yes	<u>Complaints Policy</u> (4.6) Telephone surveys – TLF (Tenant Satisfaction Measures) Interim Complaints survey Omnichannel Survey (delayed)	TLF carry out annual surveys (Tenant Satisfaction Measures) with customers via telephone, email and post. TLF have included signposting links to the complaints process via email since 2024. A change to the complaints team structure was made to support	

	about their services, they also must provide details of how residents can complain.			compliance improvements in complaint handling timescales. During this period, temporary surveys were sent to customers to obtain feedback on their service experience. Where delays in implementing Phase 2 of the omnichannel project have been presented, this interim survey will be rolled out to all complaint handling teams. This will provide multi-level customer experience feedback to inform the complaints process at Stage 1 and Stage 2 until the omnichannel survey can be developed and implemented as a long-term fixture. ACTION: Implement interim taskforce survey to obtain customer feedback on complaints service by end of Q4 2025/26. ACTION: Develop and implement Omnichannel surveys to obtain	
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				customer feedback and replace interim survey once Phase 2 is in place. Phase 2 estimated completion by end of Q1 2026/27.	
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Section 2: Exclusions

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (3.6, 3.9 – 3.12) Complaints Procedure (2.3, 2.7 – 2.9) Staff training materials: CRS Training May 2024, Page 5)	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. A refused complaints log and review, along with reporting capabilities were implemented in 2024.	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago.	Yes	System reporting PowerBI		

	- 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			
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	Yes			

	the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.				
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes			

Section 3: Accessibility and awareness

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (4.2 – 4.3) <u>Prioritisation Policy</u> (2.1, 3.1-3.3, 4.1, 5.1-5.6, 6.1, 10.2) <u>Accessible Communications Policy</u> Complaints Procedure (1.1) Staff training materials <u>Customer website</u>	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Our <u>customer website</u> identifies that complaints can be raised: • Online (My Account) • By telephone • Live Chat • Online (e-Form) • Online (Email) • In writing • In person	

			<u>Customer communications</u> <u>Making a Complaint Poster</u> Quality Assurance Assessments	Customer communications via the Newsroom for example provide information on the complaints process including changes and improvements made. Posters are displayed amongst A2Dominion Schemes and offices to communicate methods of raising complaints and the subsequent process. Quality Assurance assessments are being implemented to assess compliance with Prioritisation and customer vulnerabilities.	
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	Yes	<u>Complaints Policy</u> (4.1) <u>Prioritisation Policy</u> (2.1, 3.1-3.3, 4.1,10.2) <u>Accessible Communications Policy</u>	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. The complaints procedure details that customers may raise a	

	appropriate person within the landlord.		Complaints Procedure (2.1, 2.4, 2.5) Staff training materials <u>Customer website</u> <u>Making a Complaint Poster</u> <u>Customer communications</u>	complaint with any member of staff and how this should be directed to ensure it is acknowledged and the case managed. Complaints information is displayed in schemes and offices confirming a complaint may be raised with any member of staff and which channels are available to do so.	
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	<u>Complaints Policy</u> (Section 2, Section 8) <u>Customer website</u> <u>Customer communications</u> <u>Making a Complaint Poster</u> Staff training materials CSC / Board papers	The Head of Complaints and Resolution monitors complaint levels across the business as part of performance monitoring for the Member Responsible for Complaints (MRC), Customer Services Committee (CSC) and Board. Data is collated via dashboards to inform and enable complaint	

			PowerBI	volume monitoring, level and compliance.	
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	Complaints Policy (1.4, Section 4 ~ 4.15 - 4.27) Prioritisation Policy (3.1-3.3, 4.1, 5.1, 5.3, 6.1, 10.2) Accessible Communications Policy Complaints Procedure Staff training materials Customer website Customer communications Making a Complaint Poster	Complaints Policy is available on the website Complaints Policy . The dedicated complaints page Our complaints and resolution service - A2Dominion sets out how customers can raise a complaint and other useful information. This can be found via the 'help' function on the A2Dominion Website. The Prioritisation Policy details how consideration and support may be offered to customers to ensure accessibility of information and services. The Accessible Communications Policy details how information can be provided to allow suitable access to all customers. Non-digital complaint information posters are printed	

				and displayed on local office and scheme noticeboards to give accessible information to customers since 2024.	
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	<u>Complaints Policy (1.3)</u> <u>Prioritisation Policy (5.1,10.2)</u> <u>Customer communications</u> <u>Customer Website</u> <u>Making a Complaint Poster</u>	Articles are placed periodically in Home magazine for example “We’re Improving our complaints service” (May 2024). The Prioritisation Policy details how consideration and support may be offered to customers to ensure accessibility of information and services. The Accessible Communications Policy details how information can be provided to allow suitable access to all customers. The customer website Help Hub provides access to complaints	

				and Housing Ombudsman information. Non-digital complaint information posters are printed and displayed on local office and scheme noticeboards since 2024.	
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	<u>Complaints Policy</u> (4.4) <u>Prioritisation Policy</u> (2.1, 3.1-3.3, 4.1, 10.1-10.2) Complaints Procedure (2.1) Staff training materials Quality Assurance Assessments	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. The Prioritisation Policy details that adjustments will be made in line with the Equality Act 2010 to support customer needs. Complaints can be raised by a third party where consent from the complainant is provided to support residents in raising a complaint. Implementation of a system change ensured data is collated	

				to identify and report on third party complaints since 2024. Quality Assurance assessments are being implemented to assess compliance with Prioritisation and customer vulnerabilities.	
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	<u>Complaints Policy (7.2-7.4)</u> Complaints Procedure (3.2, 3.9, 4.8) Staff training materials Letter / email templates <u>Customer website</u> <u>Customer communications</u> <u>Making a Complaint Poster</u>	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. <u>Our complaints and resolution service - A2Dominion</u> Our website states "You're entitled to contact the Housing Ombudsman Service at any stage throughout the complaints process." The page also states after a Stage 2 Response is issued to the customer "If you remain unhappy following our final decision, you can contact	

				the Housing Ombudsman Service". The Housing Ombudsman information is provided. Non-digital complaint information posters are printed and displayed on local office and scheme noticeboards since 2024.	
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Section 4: Complaint handling staff

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	Yes	Organisational structure <u>Complaints Policy</u> Complaints Procedure	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. The overall complaint handling process is managed by the Complaints & Resolution Service	

	or team as the 'complaints officer'. This role may be in addition to other duties.			(CRS) within the Operational Performance department. The CRS is led by the Head of Complaints & Resolution, supported by two Complaints Managers (Customer & Property), a Complaint Escalation Manager and Escalation Support Manager who themselves have a team of Complaints Caseworkers. The role of the CRS is to provide administrative support and case management to the overall complaints process. The Head of CRS is responsible for the interface with the Housing Ombudsman Service.	
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	Yes	Organisational structure Complaints Policy Complaints Procedure Customer Promises (SOP)	A new Customer Promise SOP was implemented in January 2026, which outlines the process for raising and monitoring work promised to customers following a complaint.	

	to resolve disputes promptly and fairly.		Staff training materials: • CRS Training 2024, Page 5 • Introduction to the Complaints and Resolution Team 2025	Other new complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Head of CRS is part of a wider group of heads of service, and also has a network of complaints champions from across the business. Complaints champions are embedded into individual departments, with each working closely with the assigned CRS worker to ensure that complaints are resolved promptly within their respective service areas. There are different processes followed at each of the stages of the complaint, and different processes depending on which lead department is identified.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from	Yes	Organisational structure Staff training materials	A new Customer Promise SOP was implemented in January 2026, which outlines the process	

	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.		Complaints Policy (2.3, 2.4, 5.1, 8.1-8.4) Complaints Procedure (1.4, 3.5, 3.6, 7.3) Customer Promises (SOP) Staff training materials: • CRS Training 2024, Page 5 • Introduction to the Complaints and Resolution Team 2025	for raising and monitoring work promised to customers following a complaint CRS staff undergo significant amounts of training when they join us, including our complaint handling process and culture. Complaints champions embedded throughout the business receive training and refresher sessions both on a regular basis but also where intervention is needed as a result of performance. Head of CRS is responsible for ensuring that the team is adequately resourced.	
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Section 5: The complaint handling process

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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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	<u>Complaints Policy</u> Complaints Procedure (1.6) Customer Promises (SOP)	We operate a single policy for dealing with complaints covered by the HOS Code 2024.	
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	<u>Complaints Policy</u> (4.9) Complaints Procedure (2.2) Customer Promises (SOP) Staff training materials: • CRS Training 2024 • Introduction to the Complaints and Resolution Team 2025	We do not have any pre-complaint, or informal complaint 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	<u>Complaints Policy</u> (7.3) Staff training materials Complaints Procedure (1.2–1.3)	Our policy only contains two stages.	

			Letter templates Staff training materials: • CRS Training 2024 • Introduction to the Complaints and Resolution Team 2025		
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		We do not contract out any aspect of complaint handling in relation to services carried out on our behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties. Complaints requiring information from third parties such as contractors are investigated by a Complaints and Resolution caseworker with relevant parties in line with the code. The caseworker	

				will provide any response/outcome to the customer.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		We do not contract out any aspect of complaint handling in relation to services carried out on our behalf. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.	
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	<u>Complaints Policy</u> (4.16–4.18, 4.25–4.26) Complaints Procedure (3.3, 4.2) Letter Template Staff training materials: • CRS Training 2024 Quality Assurance Assessments	A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	

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	<u>Complaints Policy</u> (4.18, 4.26) Complaints Procedure (3.3, 4.2) Staff training materials: CRS Training 2024		
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	<u>Complaints Policy</u> (4.11) Complaints Procedure (3.2, 3.6, 4.4, 4.5) Staff training materials: CRS Training 2024		

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	<u>Complaints Policy</u> (4.16 – 4.19, 4.22–4.26) Complaints Procedure (3.2, 4.2) PowerBI Staff training materials: CRS Training 2024	System changes now allow record keeping of agreed complaint extensions without manual intervention (since September 2024). All fields are accessible for reporting. This is also linked to 6.4 and 6.5 below. Complaint extensions are now being reported via the PowerBI Dashboards for monitoring.	
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	<u>Complaints Policy</u> (4.3) <u>Prioritisation Policy</u> (2.1, 3.1-3.3, 4.1, 4.3, 5.1-5.6, 6.1, 10.2) <u>Accessible Communications Policy</u> Complaints Procedure (3.3, 4.5) Staff training materials: CRS Training 2024	The Prioritisation Policy details how consideration and support may be offered to customers in line with the Equality Act 2010. Prioritisation Policy training took place in April 2025 and improvements are ongoing (TSM Action Plan for refresher Prioritisation Training expected March 2026). The Accessible Communications Policy details how information can	

			Customer records (Dynamics/UH/CM) Quality Assurance Assessments	be provided to allow suitable access to all customers in line with the Equality Act 2010. Managers and senior managers can access reporting for complaints raised against a customer file where a vulnerability is recorded and highlighted to enable proactive review. A customer focused project was implemented in 2025 to work towards an increased number of departments using a centralised system. Migration to Dynamics from Contact Manager has taken place, with training and hyper care support provided to colleagues to assist with the transfer. There is now increased visibility of Resident/household vulnerabilities across departments as a result. Quality Assurance assessments are being implemented to assess	
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				compliance with Prioritisation and customer vulnerabilities.	
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	<u>Complaints Policy</u> (3.11, 4.22) Complaints Procedure (4.1) Staff training materials: CRS Training 2024 System changes PowerBI	Action from 2024 was completed to implement a means of logging refused complaints and enable reporting.	
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	Yes	<u>Complaints Policy</u> (4.8) Complaints Procedure (3.8, 4.8) Staff training materials: CRS Training 2024	Dynamics 365 is used to record all aspects of customer feedback. Within this, there is a single timeline of a customer complaint, any correspondence with the customer or other parties, and any other relevant supporting documentation.	

	parties, and any relevant supporting documentation such as reports or surveys.		Customer records (Dynamics)		
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	<u>Complaints Policy</u> (4.9, Section 5) Complaints Procedure (Section 1, 2.2) Staff training materials: CRS Training 2024	New Customer Promise SOP since December 2024.	
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	<u>Complaints Policy</u> (4.5) <u>Customer Conduct Management Policy</u> (1.3, Section 3, Section 5, 6.1-6.2) Complaints Procedure (Section 5) Staff training materials: CRS Training 2024	The Customer Conduct Management Policy was approved (2024) and published (2025), addressing the policy and guidance for unacceptable behaviour from residents and representatives. This replaces the joint policy and procedure for Recording Cautionary Alerts against Residents and Household Members, and the Unacceptable Actions by Complainants Policy 2020.	
5.15	Any restrictions placed on contact due to unacceptable	Yes			

	behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.			Cautionary alerts have been accessible via Dynamics since May 2025. Reporting has also been implemented since 2024 to demonstrate compliance and enable reviewing of restrictions.	
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Section 6: Complaints stages

Stage 1

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	Yes	<u>Complaints Policy</u> (4.9) Complaints Procedure (2.2) <u>Prioritisation Policy</u> (4.3) Organisational structure Staff training materials:	Our Service Recovery team has been set up within repairs to support customers where we recognise repeated contact, with the aim to try and get works back on track. The service recovery process also identifies customers who are vulnerable or at risk for consideration of the customers case and any necessary adjustments. To	

	resolved promptly, and an explanation, apology or resolution provided to the resident.		CRS Training 2024 Quality Assurance Assessments	date, 1500 customers have been assisted, with 70% of customers having been considered under the Prioritisation Policy. Quality Assurance assessments are to be implemented in this area of Service Recovery in line with the TSM Action Plan (estimated May 2026)	
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	<u>Complaints Policy</u> (4.15, 4.19) Complaints Procedure (2.6, 3.4) Staff training materials: CRS Training 2024 Power BI reports CSC / Board reports Organisational Structure	New Standard Operating Procedures (SOPs) are in progress and being introduced (with more in progress to support the compliance performance of Stage 1 complaints.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	CRS Training 2024 Power BI reports CSC / Board reports Organisational Structure	Updated Training has been scheduled for 05/03/2026 to address QA findings and compliance, along with refresher training. Reporting has highlighted significant Improvements in the last quarter, which have been sustained in relation to both Stage 1 and Stage 2 Complaint handling timeframes	

			Quality Assurance Assessments	being compliant. In Q3 2024, Stage 1 compliance was at 79% compared with 96% in Q3 2025. Quality Assurance has reviewed case samples on a quarterly basis since 2025 to assess and evidence the level of compliance. QA assessments are submitted to the Head of Complaints and CRS Managers with actions set for continuous improvement. These actions are monitored and escalated by the Quality Assurance team and further monitored by the Chief Customer Officer. Any overdue actions are further reviewed by the Audit and Risk Assurance Committee (ARAC). The Quality Assurance assessments completed in February, May and October 2025 highlighted cases of non-compliance with complaint handling timeframes. However, an improvement in compliance scoring is evidenced in the assessments.	
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				Cases assessed in March 2025 were 50% compliant overall compared with an 86% compliance score in October 2025. ACTION: Continue to improve and sustain compliance levels into 2026, through ongoing performance monitoring and evidence improvements via the PowerBI reporting and Quality Assurance assessments. ACTION: Implementation of the Standard Operating Procedures to provide clear guidance will enhance support of caseworkers and performance management to improve overall compliance. ACTION: Implement the Complaints Control Framework to enhance ongoing multi-level assurance.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the	Yes	<u>Complaints Policy (4.19)</u>	As above in 5.9 System changes now allow record keeping of agreed complaint extensions without	

	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.		Complaints Procedure (3.9) Customer Promise SOP Staff training materials: CRS Training 2024	manual intervention (since September 2024). All fields are accessible for reporting. This is also linked to 6.4 and 6.5 below. Complaint extensions are now being reported via the PowerBI Dashboards for monitoring.	
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	PowerBI Customer records (Dynamics)		
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	<u>Complaints Policy</u> (4.10) Complaints Procedure May 2024 (3.7) Customer Promise SOP Staff training materials: - CRS Training 2024 - Promise Dates Training Guide	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. A promise date process and training guide was implemented in August 2024. The performance data has been used to drive improvements in 2025. PowerBI Dashboard – See 6.11	

			PowerBI	ACTION: Implementation of the Standard Operating Procedures to provide clear guidance will enhance support of caseworkers and performance management to improve overall compliance. ACTION: Implement the Complaints Control Framework to enhance ongoing multi-level assurance.	
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	<u>Complaints Policy (4.12)</u> Staff training materials: - CRS Training 2024 Complaints Procedure (3.7) Staff training materials: - CRS Training 2024 Letter templates	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Quality Assurance has offered assurance since 2025 by reviewing case samples on a quarterly basis to assess and evidence the level of compliance. QA assessments are submitted to the Head of Complaints and CRS Managers with actions set for continuous improvement. These actions are monitored and escalated	

			Quality Assurance Assessments	by the Quality Assurance team and further monitored by the Chief Customer Officer. Any overdue actions are reviewed by the Audit and Risk Assurance Committee (ARAC). ACTION: Letter templates to be reviewed to ensure clear guidance for staff in relation to how compensation is provided in line with new HOS guidance issued in Q4 2025/26. (TSM Action Plan - expected April 2026)	
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	Yes	<u>Complaints Policy</u> (4.20) Complaints Procedure (3.10)	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards.	

	response, the new issues must be logged as a new complaint.				
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	<u>Complaints Policy</u> (4.12) Complaints Procedure (3.7) Staff training materials: CRS Training 2024 Letter templates Quality Assurance Assessments	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Quality Assurance has offered assurance since 2025 by reviewing case samples on a quarterly basis to assess and evidence the level of compliance. QA assessments are submitted to the Head of Complaints and CRS Managers with actions set for continuous improvement. These actions are monitored and escalated by the Quality Assurance team and further monitored by the Assistant Director/Chief Customer Officer. Any overdue actions are reviewed by the Audit and Risk Assurance Committee (ARAC).	

Stage 2

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (4.12, 4.29) Complaints Procedure (4.1, 4.2) Staff training materials: CRS Training 2024 PowerBI Reports	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards.	
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	<u>Complaints Policy</u> (4.22) Complaints Procedure (4.2) Staff training materials: CRS Training 2024 Power BI reports CSC / Board reports	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Changes to the complaints team organisation structure were made to drive performance improvements in Stage 2 responses. The improvement plan in this area was completed by introducing a dedicated team to manage Stage 2 complaints. This is reflected in improved compliance.	

				Overall, improvements have been reported across both Stage 1 and Stage 2 complaints and have been sustained over the last quarter. More specifically to Stage 1 compliance, Q3 2024 was 72%, increasing to 95% compliance in Q3 2025. Stage 2 complaints data is reported via a PowerBI dashboard for visibility along with complaint records of Stage 2 escalations. Ongoing assurance is required to monitor compliance of the acknowledgement and recording of escalations to Stage 2 complaints in practice. ACTION: Review the quality assurance process to identify differences in compliance between Stage 1 and Stage 2 complaints to provide further assurance.	
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				ACTION: Stage 2 case reviews to be implemented within the first 7 days of escalation to highlight where promises at Stage 1 have not been met (TSM Action Plan March 2026).	
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	<u>Complaints Policy</u> (4.24) Complaints Procedure (4.1) Staff training materials: CRS Training 2024		
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<u>Complaints Policy</u> (4.23) Complaints Procedure (4.4) Staff training materials: CRS Training 2024	A dedicated Stage 2 complaints team has been implemented, ensuring different caseworkers are assigned to escalated complaints.	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<u>Complaints Policy</u> (4.26) Complaints Procedure (4.4) Staff training materials: • CRS Training 2024 Power BI reports CSC / Board reports	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. As highlighted in 6.11 above, changes to the complaints team organisation structure were made to drive performance improvements in Stage 2 responses. The improvement plan in this area was completed by introducing a dedicated team to manage Stage 2 complaints. This is reflected in improved compliance. Overall, improvements have been reported across both Stage 1 and Stage 2 complaints and have been sustained over the last quarter. More specifically to Stage 1 compliance, Q3 2024 was 72%, increasing to 95% compliance in Q3 2025. Stage 2 complaints data is reported via a PowerBI dashboard for visibility	
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				along with complaint records of Stage 2 escalations. Ongoing assurance is required to monitor compliance of the acknowledgement and recording of escalations to Stage 2 complaints in practice. ACTION: Review the quality assurance process to identify differences in compliance between Stage 1 and Stage 2 complaints to provide further assurance. ACTION: Stage 2 case reviews to be implemented within the first 7 days of escalation to highlight where promises at Stage 1 have not been met (TSM Action Plan March 2026).	
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	Yes	<u>Complaints Policy</u> (4.26) Complaints Procedure (4.6) Staff training materials:	System changes have been implemented in response to the action set in 2024. Dynamics logs the Stage 2 agreed extension date and reason for the extension. This has enabled further reporting and	

	be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.		CRS Training 2024	visibility on complaints that have been extended and why, which can be communicated to HOS as appropriate.	
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	Customer records (Dynamics)	Extensions are requested in advance for any cases expected to surpass timescales.	
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	<u>Complaints Policy</u> (4.10) Complaints Procedure (4.7) Customer Promises SOP Power BI reports Staff training materials: - CRS Training 2024 - Promise Dates Training Guide	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. This links to 6.6. A new promise date process to track and update customers on outstanding actions was implemented in 2024. The data collated has been used to drive performance improvements in overall compliance throughout 2025/26. The implementation of a new PowerBI dashboard offers reporting on outstanding actions to business	

				areas (functions) to monitor 'promise dates' to resolution. Non-compliance of promise dates is reported to Director and Executive level for appropriate resolution.	
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	<u>Complaints Policy</u> (4.12) Complaints Procedure (4.7) Customer Promise SOP Staff training materials:	New complaints focused Standard Operating Procedures are underway to enhance complaints process standards. Quality Assurance has offered assurance since 2025 by reviewing case samples on a quarterly basis to assess and evidence the level of compliance. QA assessments are submitted to the Head of Complaints and CRS Managers with actions set for continuous improvement. These actions are monitored and escalated by the Quality Assurance team and further monitored by the Assistant Director/Chief Customer Officer. Any overdue actions are reviewed by the	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 1 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;	Yes	- CRS Training 2024 - Promise Dates Training Guide Letter templates Quality Assurance Assessments		

	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			Audit and Risk Assurance Committee (ARAC).	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<u>Complaints Policy</u> (4.22) Complaints Procedure (4.3) Staff training materials: CRS Training 2024		

Section 7: Putting things right

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	<u>Complaints Policy</u> (Section 5) Complaints Procedure (Section 7)	A project took place in September 2025 within the Business Improvement team to review progress of Stage 2 promise dates. This review, along with the embedding of the dedicated Stage 2	

	• Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.		Compensation Policy Customer Promise SOP Letter templates Staff training materials: • CRS Training 2024 • Promise Dates Training Guide Quality Assurance Assessments	team, enabled a backlog of customer directorate complaints to be cleared and of Property complaints to reduce from 1000 to 95. The customer directorate promise dates are now working in real time and the property directorate continue to reduce promise backlog. A new department structure was implemented in 2024, which introduced a Quality Assurance area offering further assurance. A Quality Assurance Assessment has been created to review case samples on a quarterly basis to assess and evidence the level of compliance. This is fed back to the Head of Complaints and Complaint Resolution Team Managers with set actions for review.	
7.2	Any remedy offered must reflect the impact on the	Yes	<u>Complaints Policy</u> (5.2)	Quality Assurance has offered assurance since 2025 by reviewing	

	resident as a result of any fault identified.		<u>Compensation Policy</u> (Section 4) Complaints Procedure May 2024 (Section 8) Customer Promise SOP Staff training materials: • CRS Training 2024 • Promise Dates Training Guide Quality Assurance Assessments	case samples on a quarterly basis to assess and evidence the level of compliance. QA assessments are submitted to the Head of Complaints and CRS Managers with actions set for continuous improvement. These actions are monitored and escalated by the Quality Assurance team and further monitored by the Assistant Director/Chief Customer Officer. Any overdue actions are reviewed by the Audit and Risk Assurance Committee (ARAC). ACTION: QA Frameworks to expand to include review of compensation assessment, and Prioritisation Policy application (TSM Action Plan – Expected April 2026)	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate.	Yes	<u>Complaints Policy</u> (5.3) <u>Compensation Policy</u>	As per 6.6 and 6.17 of this self-assessment, we monitor the	

	Any remedy proposed must be followed through to completion.		Complaints Procedure (Section 8) Customer Promise SOP Staff training materials: • CRS Training 2024 • Promise Dates Training Guide Letter templates Power BI reports	progression of promise dates made in remedy of a complaint.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<u>Complaints Policy</u> (5.2) Complaints Procedure <u>Compensation Policy</u> (1.3) Staff training materials: • CRS Training 2024		

Section 8: Self-assessment, reporting and compliance

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's	Yes	<u>Annual Complaints Performance and Service Improvement Report 2024/25</u> Annual Complaints Performance and Service Improvement Report 2025/26 (to be completed)	The 2024/25 report was approved by Board and a response issued, which is accessible via the customer website. The 2025/26 annual report is to be completed.	
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	performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.				
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual Complaints Performance and Service Improvement Report 2024/25 Annual Complaints Performance and Service Improvement Report 2025/26 (to be completed)	The Board have provided responses to the 2024/25 report, along with the preceding years report, which are published on our website. The 2025/26 report is to be completed.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		We will update this self-assessment as necessary in line with the Code requirements.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will update this self-assessment as necessary in line with the HOS requirements.	

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	<u>Complaints Policy</u> (Section 6) Complaints Procedure		
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code	Code requirement	Comply?	Evidence	Commentary / explanation	RAG
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	<u>Complaints Policy</u> (8.2) Complaints Procedure Staff training materials: CRS Training 2024 Power BI reports	Operationally this is done through regular monitoring of reports relating to learning, led by the Head of CRS. This is also fed into regular reporting to CSC and Board.	

			CSC / Board reports		
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	<u>Complaints Policy</u> (2.1, 2.2, 8.3) Complaints Procedure Staff training materials: CRS Training 2024 Power BI reports CSC / Board reports	CSC and Board are updated with learning from complaints and how that is embedded in service improvements. Additionally, we report back wider learning and improvements from complaints to customers through the <u>Customer Annual Report</u> , the colleague Intranet, as well as the Customer Services Committee and Board	
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	<u>Customer Annual Report</u>	.	
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	Yes	Organisational structure Power BI reports CSC / Board reports	The Head of CRS is appointed as accountable for the organisation's complaint handling. They are responsible for analysing complaints, including performance,	

	identify potential systemic issues, serious risks, or policies and procedures that require revision.			trends and risks as well as recommending changes to policies and procedures. The Head of CRS reports to the Chief Customer Officer (CCO) who leads a directorate created centralising a range of performance-related services which emphasises the commitment to streamlining the journey from service failures to service improvements.	
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	Organisational structure	Emma Palmer (Board Member and Chair of CSC) is appointed as the MRC, and accountable to ensuring a positive complaint handling culture is embedded within the organisation. The MRC is supported in this role by the CCO.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight	Yes	Power BI reports CSC / Board reports	The MRC is also the Chair of Customer Services Committee (CSC) where each quarter a KPI report is delivered, known as the	

	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.			performance and assurance (P&A) report, outlining performance on a range of matters, including complaints. Additionally, the Board receives, via CSC, a quarterly report on Customer Voice, which includes a section on complaint handling and performance, in line with the requirements in Code provision 9.7 below.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in	Yes	Organisational structure Power BI reports CSC / Board reports	As Code provision 9.6 above, both CSC and Board received regular updates on complaints data in line with these Code requirements. The annual complaints performance and service improvement report is presented to board ahead of submission to HOS each year. The last one presented in June 2025 for the period 2024/25.	

	complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.				
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by	Yes	Complaints Policy Complaints Procedure Record Keeping SOP (3. Procedure) Intranet articles Training videos	The CCO delivered a campaign to Make Every Contact Count (MECC) in recognition of the challenges we face with our systems and processes pending various improvement programmes. The Record Keeping SOP stipulates all staff are to maintain customer contact records. A system project to align customer contact record systems was implemented in 2025. This has increased colleague accessibility to a centralised system. The CRS team specifically has objectives around complaint resolution.	

	any relevant professional body.				
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Version control

Date	Changes made	Completed by	Approved by	Approved on
03/03/2026	Self-assessment QA review drafted	Layla Clayton-Collier	Antonia Phillips, Head of Complaints and Resolution	04/03/2026
06/03/2026	Section 6.2, 6.3, 6.11 and 6.14 updated to Compliant with further assurance needed.	Layla Clayton-Collier	Antonia Phillips, Head of Complaints and Resolution	06/03/2026