

Southdown’s Complaints Handling Self-Assessment 2025 against the Housing Ombudsman’s Complaint Handling Code

This self-assessment was completed in June 2025 by Southdown’s Director of Housing & Assets and reviewed and approved by Southdown’s governing body in line with Ombudsman’s Complaint Handling Code requirements.

This self-assessment is published as an addition to Southdown’s Annual Complaints Performance and Service Improvement Report on our website, alongside our Board’s response to the report.

Southdown have completed the self-assessment in full and supported all statements with evidence and additional commentary. Southdown assesses it is compliant with the Code but we identified some areas for further improvement.

Anyone wishing to make a complaint about Southdown, or make suggestions how we can improve our services, can do so by following this link: <https://www.southdown.org/feedback-contacts/> or contacting us directly stating their wish.

Contents	
Southdown’s Complaints Handling Self-Assessment 2025 against the Housing Ombudsman’s Complaint Handling Code.....	1
Section 1: Definition of a complaint	2
Section 2: Exclusions	3
Section 3: Accessibility and Awareness.....	6
Section 4: Complaint Handling Staff	10
Section 5: The Complaint Handling Process	11
Section 6: Complaints Stages	16
Section 7: Putting things right	21
Section 8: Self-assessment, reporting and compliance	23
Section 9: Scrutiny & oversight: continuous learning and improvement	24

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	This wording is included in Comments, Compliments & Complaints Policy ('Complaints Policy').	Southdown applies the complaints policy and procedure to all its service provision so utilises the term client but is clear in the policy that this also includes tenants and complaints relating to tenancy issues and the provision of landlord services.
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	We define a complaint as per the wording in 1.2 above. We log tenants' dissatisfaction on our Housing Management System; residents are given the choice to make a complaint if they raise dissatisfaction with our service Third party complaints are handled as per our policy and procedure.	Consent from the resident is required unless an advocacy agreement is already in place.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Service requests are recorded on our Housing Management System, are monitored and will be reviewed at least annually.	Included in our policy but processes still need to be more deeply embedded in our procedures and annual complaints review.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the	Yes	This is standard practice and specific reference exists within our complaints policy to this definition.	

	<p>handling of the service request remains ongoing.</p> <p>Landlords must not stop their efforts to address the service request if the resident complains.</p>			
1.6	<p>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.</p> <p>Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	In progress	<p>We have not treated dissatisfaction through a survey as a complaint.</p> <p>Our previous practice has not routinely circulated information on how to complain alongside surveys and requests for feedback. We recognise the value of learning from complaints and taking every opportunity to remind tenants and clients how they can raise a complaint.</p>	<p>Southdown will include this communication alongside future satisfaction surveys to be undertaken in 2025 and going forward.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	<p>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</p>	Yes	<p>Excerpts from our policy:</p> <p>‘If we decide not to accept a complaint, a detailed explanation must be provided to the complainant explaining the reasons why the matter is not suitable for the complaints process and the right for tenants to take that decision to the Housing Ombudsman.’</p>	

			‘the Investigating Officer will: deal with the complaint on its own merits’	
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"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>Policy wording:</p> <p>In some limited circumstances we may not deal with a complaint via our Complaints Procedure. These circumstances include but are not limited to:</p> <ul style="list-style-type: none"> • Where the issue being complained about happened more than 12 months ago (unless the complaint is about a recurring issue and some instances occurred more recently than 12 months ago) • Where the complainant has already started legal proceedings to address the issues being complained of, the issue will be dealt with as part of the legal process. • Where the issue being complained about has already been dealt with via our Complaints Procedure. • Where the complaint is the first report of anti-social behaviour relating to a Southdown property or tenant. 	

			Complaints which relate to Southdown’s handling of previous reports of anti-social behaviour are deemed to be within scope of the complaints process, subject to the above exclusions.	
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	Our policy allows for complaints to be opened within 12 months of the tenant or client becoming aware of the issue.	Policy recently updated (April 25) to allow some further discretion in accepting complaints, where there is good reason to do so, that may have been otherwise excluded by the letter of the policy.
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	Our policy wording: “If we decide not to accept a complaint, a detailed explanation must be provided to the complainant explaining the reasons why the matter is not suitable for the complaints process and the right for tenants to take that decision to the Housing Ombudsman. “	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Policy wording: “When dealing with a complaint, the Investigating Officer will: <ul style="list-style-type: none"> • Deal with the complaint on its own merits • Act independently and with an open mind 	

			<ul style="list-style-type: none"> • Take measures to address actual or perceived conflict of interest • Consider all information and evidence carefully” 	
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Policy wording:</p> <p>“Feedback will be accepted from anyone, including external individuals and organisations, in person, by telephone, letter, email, via our website and social media.”</p> <p>“We will make all reasonable adjustments to meet clients’/tenants’ specific needs where possible. If a translator or a sign-language interpreter is needed to assist in making a complaint, we will make reasonable attempts to help with this.</p> <p>Clients/tenants may be supported by advocates, interpreters or other appropriate facility or person they choose, to help give their feedback.</p> <p>We will assist clients/tenants to make a complaint in a way easiest for them. We will not insist on complaints being made in writing but will record complaints as dictated by clients where needed.</p> <p>We will consider requests from</p>	Our standard templates ensure reasonable adjustments and communication preferences are captured and catered for.

			clients/tenants for more time to comply with our complaints procedure if they feel they would otherwise be unfairly disadvantaged as a result of their disability.”	
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	<p>Policy wording:</p> <p>“Feedback will be accepted from anyone, including external individuals and organisations, in person, by telephone, letter, email, via our website and social media.”</p> <p>Our complaints procedure is easily accessible to staff on our Intranet and clearly explains who to pass details of the complaint to.</p>	
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	<p>Wording from our policy:</p> <p>“Southdown encourages feedback and sees this as essential as a learning organisation. Feedback will be viewed positively, be part of monitoring and improving service quality, and will be dealt with promptly, efficiently and in a fair manner and take into account all relevant circumstances including contradictory views.”</p> <p>Our process is well publicised: Our complaints policy, procedure and leaflet are on our website; the complaints process is included in Tenants’ Handbook, tenancy sign-up packs and the annual</p>	

			report to tenants.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p>Full policy and procedure on our website. They explain the two-stage process, what will happen at each stage, and the timeframes for responding.</p> <p>Our complaints leaflet is available in standard and 'easy read' formats, on paper and on our website. It details the two-stage process, what will happen at each stage, and the timeframes for responding</p>	Complaints process and associated procedure are currently undergoing review with client and tenant input into design to ensure it is truly accessible and any barriers to raising complaints are identified and addressed.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Our Policy now explains how we publicise details of the complaints policy and allow clients and tenants to provide feedback.</p> <p>We do include details of our Complaint Code self-assessment:</p> <p><i>"In line with the Housing Ombudsman's Complaint Handling Code, we will complete a self-assessment of our Housing complaints policy, procedure and complaints statistics annually. This will also be presented to the board."</i></p>	
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	Extract from our complaints Leaflet:	

			<p>Client / tenant consent</p> <p>If you are making a complaint on behalf of a Southdown client we will write to them and ask for their consent for Southdown to share their information. If they do not consent to Southdown sharing their information, we will not be able to process the complaint.</p> <p>Wording from our policy:</p> <p>“Feedback will be accepted from anyone, including external individuals and organisations, in person, by telephone, letter, email, via our website and social media”.</p> <p>Clients/tenants may be supported by advocates, interpreters or other appropriate facility or person they choose, to help give their feedback.</p>	
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	Ombudsman’s contact details are included in our complaints leaflet and complaint response letters (Stage 1 and 2) and explains they can contact the Ombudsman at any time during a complaint.	These exist within the standard letter templates for housing related complaints. Templates have been adapted for other operating areas beyond housing in recognition of different commissioning arrangements.

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	Our Manager: Operational Support now holds responsibility for complaint handling and reporting to the Board. Senior operational managers are assigned to handle complaints, including liaison with the Ombudsman, with a central admin officer who reports complaints to the Operational Performance Group.	
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	Officers handling complaints are at a leadership level and have access to staff at all levels to facilitate the prompt resolution of complaints. They have the authority and autonomy to act to resolve disputes promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Wording from our policy: "Southdown encourages feedback and sees this as essential as a learning organisation. Feedback will be viewed positively, be part of monitoring and improving service quality, and will be dealt with promptly, efficiently and in a fair manner and take into account all relevant circumstances including	All relevant staff receive training on our 'Beacon' culture and best practice framework, which details how to work in a psychologically informed and person-centred way, as well as training in dealing with difficult conversations and behaviour that challenges. As all managers receive this training, we are always

			<p>contradictory views.”</p> <p>“Complaints will be investigated by Managers skilled in dealing with complaints.”</p>	<p>resourced to deal with complaints effectively.</p> <p>Individual complaints, and Southdown’s response are overseen by Senior Managers as a standard agenda item of the Operational Performance Group and a summary of complaints is reviewed at the Service Quality Committee – a sub-committee of the Board.</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	We have one policy for all clients and resident; residents are not treated differently if they have previously complained or have a complaint in progress and our policy is explicit on this point.	
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	Yes	<p>We strive to resolve issues early & locally.</p> <p>Our process consists of stages 1 and 2; there are no other stages</p>	

	this causes unnecessary confusion.			
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Our procedure consists of two stages only	
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	It would form part of our two-stage complaints process. We do not currently allow third parties handle a complaint stage relating to Southdown's housing or client services.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Southdown does not currently permit 3 rd parties to handle its complaint stages on its behalf.	
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	This requirement is set out in our Complaints Procedure and relevant wording in our acknowledgement letter template.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	All aspects of a complaint we are responsible for are clarified using our acknowledgement and response letter templates. Where we believe responsibility for some elements sit with another party we will clearly identify this.	

<p>5.8</p>	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. Deal with complaints on their merits, act independently, and have an open mind; b. Give the resident a fair chance to set out their position; c. Take measures to address any actual or perceived conflict of interest; and d. Consider all relevant information and evidence carefully. 	<p>Yes</p>	<p>Wording from our policy:</p> <p>“When dealing with a complaint, the Investigating Officer will:</p> <ul style="list-style-type: none"> • Deal with the complaint on its own merits • Act independently and with an open mind • Take measures to address actual or perceived conflict of interest • Consider all information and evidence carefully • Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter or to resolve issues raised. “ 	
<p>5.9</p>	<p>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.</p>	<p>Yes</p>	<p>It is the responsibility of the investigating manager to contact the client/tenant to discuss and agree appropriate frequencies for updating the client as to the progress of their complaint.</p> <p>Our policy requires we send a letter (or via the complainants preferred from of contact) informing them if the response will be late, the reason for this and when they will receive a response.</p>	

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.	Partial – improvement in progress	<p>Reasonable adjustment is included as Section 7 of our policy.</p> <p>We record disabilities & reasonable adjustments on our client and tenant record systems.</p> <p>We do make reasonable adjustments when we are aware but need to more formally identify these adjustments through the process.</p>	Although already captured, there is room for improvement – we will include reasonable adjustments in the complaints monitoring template and in ongoing training.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<p>We would not unreasonably refuse to escalate a complaint.</p> <p>We list valid reasons where we would refuse to escalate a complaint within our policy. These are in line with the HO code.</p>	
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	A record is created on our client database for each complaint, and given a unique ID number. The complaint, letters and all related documents are saved to this record. Date received is logged, along with deadlines and dates letters sent.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords	Yes	This is standard practice – and explicitly stated within our policy.	

	must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			
5.14	<p>Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives.</p> <p>Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.</p>	Yes	<p>We have an Acceptable Behaviour Policy and Procedure – this specifies the need for keeping any restrictions under review.</p> <p>We keep clear records of contacts with all parties involved, including partner agencies to clearly evidence our reasons for putting restrictions in place.</p>	<p>Cases and restrictions are set for defined periods and subject to review and allow for the right to appeal.</p>
5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	Yes	<p>We have an Acceptable Behaviour Policy and Procedure – this specifies the need for keeping any restrictions under review.</p> <p>We will be mindful of sudden deteriorations in behaviour and try to build rapport with tenants or clients demonstrating unacceptable behaviour to understand what might be going on in their life at this time.</p>	<p>Southdown’s ‘Beacon’ framework seeks to understand the people involved in our cases as individuals, thinking about how adverse previous experiences might be impacting on current behaviour.</p>

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	<p>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.</p> <p>Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.</p>	Yes	<p>Southdown recognise the importance of being heard and have retained its three working day target for the complaint acknowledgement stage (2 days less than Ombudsman requirements).</p> <p>Southdown understands the importance of prioritising complaints and the client having a positive experience of the complaints process. Wherever possible the investigating manager is to respond promptly, recognising that most complaints can be investigated and dealt with swiftly and an explanation, apology or resolution provided.</p> <p>Our procedure requires all stage 1 complaints to be responded to within 10 working days of receipt and stage 2 complaints within 20 working days.</p> <p>If the investigation needs more time due to complexity, the officer will</p>	<p>We have developed a ‘service request’ contact category within our housing management system.</p> <p>We seek to identify what would resolve the issue to the tenants’ satisfaction as a key factor of our complaints handling process.</p> <p>Wording from our policy regarding reasonable adjustments: “We will consider requests from clients/tenants for more time to comply with our complaints procedure if they feel they would otherwise be unfairly disadvantaged as a result of their disability. “</p>

			inform the complainant in writing, explaining the reasons and expected timescale and agreeing with the complainant an appropriate frequency for updating them as to the progress of their complaint.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Our procedure states 3 working days as we believe 5 working days is too long to leave someone unsure as to whether their complaint has been received.	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Our procedure states within 10 working days of complaint acknowledgement	
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	This is set out in our Complaints Procedure. We have a standard 'Delay in Response Letter' template to inform the complainant of the extension, which includes a new timescale including clear reasons for this delay.	
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	The Ombudsman's contact details are included on our 'Delay in response' letter template for complaints related to our housing operations.	
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	Yes	Standard practice is to respond when the answer is known. Actions are added to an individual Activity & Actions log for the complaint and to a	Although actions are tracked this remains at a local level – our redesign of the complaints process seeks to ensure greater

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		main tracker covering all complaints.	central visibility of the progress in completing actions raised in response to complaints.
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	This is standard practice and included within our procedure and evidenced in our letter template.	
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	This is specified in our procedure	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied 	Yes	This is included in our template response letter and evidenced by our internal review of complaints responses.	

	with the response.			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	This is covered by our procedure	
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	Our procedure is to do this within <u>three</u> working days of receipt	
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	We have made our policy clearer to demonstrate this. Wherever possible the objective is to understand, from the complainant, how we might be able to resolve the complaint to the	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our procedure states manager at stage 1, senior manager will allocate an investigating manager at Stage 2	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Our procedure specifies 20 working days of complaint receipt	
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	Yes	We inform residents using our 'Delay in Response letter' template. Our template to include clear reasons	

	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.		and our procedure requires the investigating manager to agree suitable intervals for updating the complaint and the progress of their complaint.	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Contact details are included in our 'Delay in Response letter' template	
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	This is our standard practice. Outstanding actions are added to our actions tracker to ensure completion. Internal evidence indicates that we do inform the client/tenant of actions completed after the response letter is sent.	Action tracker needs to be further embedded in practice and reporting to formalise this important stage.
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	This is our standard procedure and covered within our policy and procedure framework.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	Our stage 2 response letter template includes instruction to include these details.	

	g. 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	This is our standard procedure.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • 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. 	Yes	This is standard practice and there are prompts in our response letter templates to include findings, reasons and further actions to be taken	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault	Yes	Using our psychologically informed and person-centred framework, the	

	identified.		Beacon, we work with clients and tenants to find remedies that are meaningful and impactful in the context of the faults they have raised.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Response letters set out what will happen and by when. Residents/clients are met/telephoned where appropriate (depending on their request to/not to be contacted by phone)	The action tracker needs to be further embedded in practice and reporting to formalise this important stage.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We would always seek to use the guidance of the Ombudsman and use this to develop our best practice.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord’s performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Our Annual Complaints Report includes a, b & d, and will include c; e & f if any findings</p> <p>We have adapted our processes within the 24/25 year to record issues not accepted as complaints or those service requests able to be resolved before such a point as they become a complaint.</p>	
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints.</p>	Yes	<p>Annual complaints report is reviewed by the C-Suite and the Board.</p> <p>The Tenants Complaints Review and Complaints Self-Assessment are</p>	<p>Annual complaints report is also adapted for the website and hosted alongside the response from our Board lead on complaints handling.</p>

	The governing body's response to the report must be published alongside this.		published on our website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	No restructure significant to complaints process has taken place. We would self-assess where required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply should this happen	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We will comply should this happen.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>This forms part of our continuous improvement culture.</p> <p>From our policy: <i>"Southdown encourages feedback and sees this as essential as a learning organisation.</i></p> <p><i>Feedback will be viewed positively, be part of monitoring and improving service quality.."</i></p>	<p>Themes arising from complaints – and complaints handling - are identified by the monthly review of complaints at the Operational Performance Group (attended by all heads of service).</p> <p>The Boards' Service Quality Committee reviews complaints and complaints performance three times a year including</p>

			Our procedure states that following a complaint Southdown will: <i>“Arrange a Lessons Learnt meeting with relevant staff members to discuss lessons learnt from the investigation, actions already identified/taken, and further actions required to improve Southdown services”</i>	performance against the Code.
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	Extract from our Comments, Compliments and Complaints Policy. <i>“Southdown encourages feedback and sees this as essential as a learning organisation. Feedback will be viewed positively, be part of monitoring and improving service quality”</i>	Complaints are reviewed monthly by the Operational Performance Group who identify, log and track actions in terms of organisational learning and improvements to procedure.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents’ panels, staff and relevant committees.	Yes	We publish our findings in our Annual Tenant Report which all tenants receive and is available on our website, to our board in our Annual Complaints Report. Our Involvement Lead conducts an annual review of complaints with clients and tenants	We provide an anonymised overview of complaints to our clients and tenants through an annual report, detailing themes and organisational learning.
9.4	Landlords must appoint a suitably senior lead	Yes	Director of Housing & Assets has	

	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.		taken on this role and oversees complaints via the Operational Performance Group. A Client/Tenant Involvement Lead supports with this work.	
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	We have a designated Board Member Responsible for Complaints (MRC) Complaints are reviewed through the Board's Service Quality Committee 3x yearly and the whole Board annually.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC receives regular updates on complaints via the Service Quality Committee receiving data and insights from the Client and Tenant Involvement Lead	The Service Quality Committee will receive regular oversight of complaints as well as service improvement steps identified.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and 	Yes	The Service Quality Committee (SQC) receives regular oversight of complaints as well as service improvement steps identified from complaints as a standard agenda item. The SQC oversees an annual review of complaints	The Operational Performance Group receive a monthly report of open and recently closed complaints, insights and learning. which is presented to the Board.

	d. annual complaints performance and service improvement report.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>These form part of Complaints Policy and Southdown’s values to be a force for good, brilliant with people, united, trustworthy, and responsive.</p> <p>The Southdown Beacon guides employees to build relationships that value working together. This means we adopt a collaborative approach, with both clients and colleagues, and value multiple perspectives and voices.</p> <p>We also advocate against a blame culture, instead adopting shared responsibility with a commitment to a Growth Mindset and continuous improvement to ensure we learn from complaints and provide the best service possible.</p>	