

Southdown's Complaints Handling Self-Assessment 2026 against the Housing Ombudsman's Complaint Handling Code

This self-assessment was completed in May 2026 by Southdown's Manager, Operational Support, 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 is satisfied that it is compliant with all standards within the Code and has additionally identified areas for planned improvement.

Anyone wishing to make a complaint about Southdown, or make suggestions on 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 2026 against the Housing Ombudsman's Complaint Handling Code.....	1
Section 1: Definition of a complaint	2
Section 2: Exclusions	6
Section 3: Accessibility and Awareness.....	11
Section 4: Complaint Handling Staff.....	21
Section 5: The Complaint Handling Process.....	23
Section 6: Complaints Stages	31
Section 7: Putting things right	44
Section 8: Self-assessment, reporting and compliance	48
Section 9: Scrutiny & oversight: continuous learning and improvement.....	52

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,</i>	Yes	This wording is included in our Have Your Say: Complaints Policy	Southdown's complaints policy defines a complaint as "any

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<i>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>			expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Southdown, our staff or those acting on our behalf." Although the definition does not explicitly refer to "a resident or group of residents", it fully meets this requirement, as tenants and complaints relating to tenancy matters are explicitly included within the policy. The policy is intentionally broader to reflect Southdown's wider role and breadth of services, enabling complaints

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				to be accepted from clients, tenants, members of the public and other stakeholders, while continuing to meet the Housing Ombudsman Complaint Handling Code's requirements for landlord-related complaints.
1.3	1.1 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 a 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 any expression of dissatisfaction. All expressions of dissatisfaction are logged on our Have Your Say portal. Where it is not immediately clear that an individual wishes to make a complaint, clients and tenants are given the option to do so. Tenant service requests are logged separately on our housing	Consent from the resident is required unless an advocacy agreement is already in place.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			management system. If these are not resolved, they are automatically escalated to a complaint and managed in line with our complaints process. Third-party complaints are handled in accordance with our complaints policy.	
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 and monitored on our Housing Management System and are reviewed at least annually.	Service requests are clearly defined within our policy.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the	Yes	This is standard practice, and specific reference exists within our	This approach is reflected in, and clearly referenced within,

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		complaints policy to this definition.	our complaints policy.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Southdown now includes this information alongside its satisfaction surveys, ensuring that residents are clearly informed how they can pursue a complaint if they wish to do so. This approach has been in place for surveys from 2025.	

Section 2: Exclusions

Code	Code requirement	Comply:	Evidence	Commentary / explanation
------	------------------	---------	----------	--------------------------

provision		Yes / No		
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	Our policy states: 'If we decide not to accept a complaint, a detailed explanation will 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.'	
2.2	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. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim,	Yes	Our policy states: In some limited circumstances we may not deal with a complaint via our Complaints Procedure. These circumstances include but are not limited to: • Service Requests • Complaints raised more than 12 months after the issue occurred, unless:	

	having been filed at court. • Matters that have previously been considered under the complaints policy.		there is good reason for the delay (e.g. a client was in hospital for a prolonged period) OR the complaint is about a recurring issue and some instances occurred more than 12 months ago OR the complainant has only just become aware of the issue • Repairs or maintenance, unless the complaint is about a repair or maintenance issue that has previously been reported to us • Where the complainant has already started legal proceedings to address the issues being complained of. In such cases the issue will be dealt with as part of the legal	
--	--	--	--	--

			process. • Where the issue being complained about has already been investigated and responded to via both stages of our Complaints Procedure and there are no material changes that suggest that the matter is substantially different to the original complaint. • 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.	
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 states: "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	Yes	Our policy states: "When dealing with a complaint, the	

	each complaint.		Investigating Officer will: • 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"	
--	-----------------	--	---	--

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	Yes	Policy wording includes: "A complainant may have an advocate act on their behalf and may be represented or accompanied at any meeting about the complaint." "Our Have Your Say form, which is available on our website's 'Contact us'	Our standard templates ensure reasonable adjustments and communication preferences are captured and catered for.

	may need to access the complaints process.		page, is the quickest way to contact us, however there are lots of other ways people can raise a complaint, including: • Telling a member of staff or manager • Completing feedback forms in the service • Emailing us at feedback@southdown.org • Calling us on 01273 405800 • Writing to us at 2 Bell Lane, Lewes, East Sussex, BN7 1JU • Filling in our Feedback Form, also available on our website's 'Contact Us' page" We are committed to ensuring that everyone can access the complaints process. We will: • Make all reasonable	
--	---	--	--	--

			adjustments where possible (e.g. provide information in an easy read format or a language interpreter), record the agreed adjustments, and keep them under review. Adjust our deadlines when someone needs more time because of a disability, ensuring they have the time and support required during the complaints process."	
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	We offer a wide range of ways for people to make a complaint, as described in 3.1. Our complaints procedure is easily accessible to staff via the Intranet and clearly sets out how to log a complaint, following which it is escalated to the appropriate complaint handler.	
3.3	High volumes of complaints must not be	Yes	Our policy states:	

	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.		“We welcome complaints because they help us improve. When someone takes the time to tell us something hasn’t gone well, it gives us a chance to put things right—not just for them, but for others too. Complaints help us identify where things may not be working as they should, and they support us in learning, growing, and delivering better services.” Our complaints process is well publicised: Our complaints policy and leaflet are published on our website, and the complaints process is included in our Tenants’ Handbook, tenancy sign-up packs and the tenants annual report.	
--	--	--	---	--

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 - with further improvements planned	Our complaints policy is published on our website and clearly sets out our two-stage complaints process, including what will happen at each stage and the timescales for responding. Our complaints leaflet is also available both on our website and in paper format. It mirrors the policy by explaining in a clear and accessible format the two-stage process, what complainants can expect at each stage, and the relevant timeframes.	We have recently updated our complaints leaflet, with plans in place to develop a comparable easy-read version for clients and tenants with a learning disability.
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	Our policy states: We will make this Complaints Policy easy for clients, tenants and members of the public to access and understand. We will: • Publish the policy clearly on our	

			website and provide printed copies on request. • Include information about how to make a complaint in key documents and communications for both tenants and clients. • Ensure everyone using our services knows how to raise a complaint, how it will be handled, and their right to escalate if they remain dissatisfied. • Keep our Complaints Policy up to date and ensure it's communicated in a way that's accessible, inclusive and easy for people to understand	
--	--	--	--	--

			It also includes the following information about the Housing Ombudsman and Complaint Handling Code: The Housing Ombudsman is an independent, impartial, and free service for social housing tenants. Tenants can take a complaint about us to the Ombudsman if they have completed our complaints process and are not happy with the outcome. They can also contact them if we have not responded to a complaint they have made within a reasonable time. <i>Housing Ombudsman Complaint Handling Code</i> The Housing Ombudsman's Complaint Handling Code sets the rules all social housing landlords must follow to make	
--	--	--	--	--

			sure complaints are handled fairly and consistently. The Code explains what a good complaints process should look like and what information tenants should have access to. Each year, landlords must complete and publish on their website: • A self-assessment against the Code • An annual review of complaints for tenants • Their Board's response to the self-assessment and annual review	
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	Our policy states: "A complainant may have an advocate act on their behalf and may be represented or accompanied at any meeting about the complaint."	

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	Our policy includes information about the Housing Ombudsman, advising tenants that they may refer a complaint to the Ombudsman if they have completed our complaints process and remain dissatisfied with the outcome, or if we have not responded to their complaint within a reasonable timescale. The Housing Ombudsman's contact details are included in our complaints leaflet and on our website. For housing-related complaints, our Stage 1 and Stage 2 complaint response letters also advise complainants how to escalate their complaint to the Housing Ombudsman if they are dissatisfied with the outcome.	
-----	--	-----	--	--

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	Southdown's Manager, Operational Support fulfils the role of 'complaints officer'. They have overall responsibility for complaint handling and for reporting to both the Board and the Operational Leadership Team, supported by the complaints administration team. Senior managers are responsible for liaising with the Housing Ombudsman, with support from the complaints administration team where required.	
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	Yes	The complaints officer is a senior manager and has access to staff at all levels to facilitate the prompt resolution of complaints. They have the authority and	

	promptly and fairly.		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 - with further improvements planned	Our policy states: "We welcome complaints because they help us improve. When someone takes the time to tell us something hasn't gone well, it gives us a chance to put things right—not just for them, but for others too." "Complaints help us identify where things may not be working as they should, and they support us in learning, growing, and delivering better services." "Complaints will be investigated by managers skilled in dealing with complaints."	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 resourced to deal with complaints effectively. In addition, we are developing an e-learning module for staff on complaints handling, alongside additional manager

				training. Individual complaints, and Southdown's response are overseen by Senior Managers as a standard agenda item of the monthly Operational Leadership Team meetings, and a summary of complaints is reviewed at the Service Quality Committee – a sub-committee of the Board.
--	--	--	--	---

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	Yes	We have one policy for all clients, tenants, and anyone else wishing to	

	by this Code. Residents must not be treated differently if they complain.		make a complaint. Tenants 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 this causes unnecessary confusion.	Yes	We strive to resolve issues early & locally. Our process consists of stages 1 and 2. There are no other stages.	
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 process consists of stages 1 and 2. There are no other stages.	
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	Yes	At present, we do not permit third parties to handle a tenant complaint. Should we do so in the future, we would ensure that this forms part	

	through two complaints processes.		of the two-stage process as set out in the Code.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	At present, we do not permit third parties to handle a tenant complaint. Should we do so in the future, we would ensure that the complaint is handled in line with the Code.	
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 is included within 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 for which we are responsible are clarified through our acknowledgement and response letter templates.	

			Where we believe responsibility for some elements sit with another party we will clearly identify this.	
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	Our policy states: "When dealing with a complaint, the Investigating Officer will: - 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. "	
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	It is the responsibility of the investigating manager to contact the client or tenant to agree how frequently they will be updated on the progress of their complaint. Where a response cannot be provided within the expected timescale, we notify the complainant in writing, explaining the reason for the delay and confirming when a response will be issued.	
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	Yes - with further improvements planned	Southdown's policy clearly reflects its commitment to meeting the requirements of the Equality Act 2010 by making reasonable adjustments to ensure all clients and tenants can access the	To further strengthen our approach, we are enhancing the capture and review of this information across services, including improvements to our complaints database to

	disclosed. Any agreed reasonable adjustments must be kept under active review.		complaints process. This includes providing information in accessible formats, offering interpretation support where needed, adjusting timescales, and keeping agreed adjustments under review. We record disabilities and agreed reasonable adjustments within our client and tenant record systems, ensuring that individual needs are recognised and supported throughout the complaints process.	support more effective data collection and reporting. These developments will support an even more robust and responsive approach to identifying, recording, and meeting residents' needs.
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	Yes	We would not unreasonably refuse to escalate a complaint. Our policy sets out valid reasons where escalation of a complaint may not be appropriate, in line with	

	section 2 of this Code.		the Housing Ombudsman Code.	
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 - with further improvements planned	A record is created on our complaints database for each complaint, which is allocated a unique reference number. All complaint details, correspondence (including letters or records of other forms of communication), and case notes, are embedded within the system. Key dates across the complaint lifecycle, such as the date the complaint is received, response deadlines, and the date responses are issued, are also recorded automatically, ensuring a clear and auditable timeline.	At present, the system does not support the upload of additional supporting documents or evidence, such as photographs. Where required, these materials are stored securely in a dedicated channel outside of the database. As part of the ongoing development of the complaints database, plans are in place to introduce this functionality, enabling supporting documents to be uploaded and managed directly within the system.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process.	Yes	This is standard practice and explicitly stated within our policy.	

	Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			
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	We have an Acceptable Behaviour Policy and Procedure. This specifies the need for keeping any restrictions under review. We keep clear records of contacts with all parties involved, including partner agencies to clearly evidence our reasons for putting restrictions in place.	Cases and restrictions are set for defined periods, are subject to review, and include a right of appeal.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	We have an Acceptable Behaviour Policy and Procedure. This specifies the need for keeping any restrictions under review. We will be mindful of sudden deteriorations in behaviour and try to build rapport with tenants or	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

			clients demonstrating unacceptable behaviour to understand what might be going on in their life at this time.	behaviour.
--	--	--	---	------------

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved	Yes	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	As part of our complaints redesign project, we have further strengthened our emphasis on a resolution-focused approach, placing greater priority on understanding what would resolve the issue to the tenant's satisfaction, rather

	promptly, and an explanation, apology or resolution provided to the resident.		and an explanation, apology or resolution provided. Our procedure requires all stage 1 complaints to be responded to within 10 working days from date of acknowledgement, and stage 2 complaints within 20 working days. If the investigation needs more time due to complexity, the investigating manager will inform the complainant in writing, explaining the reasons and expected timescale, and agreeing with the complainant an appropriate frequency for updating them with progress on their complaint. Within our housing management system, we have developed a 'service request' contact category	than adopting a culture centred on determining who is right or wrong. Wording from our policy regarding reasonable adjustments: We are committed to ensuring that everyone can access the complaints process. We will: • Make all reasonable adjustments where possible (e.g. provide information in an easy read format or a language interpreter), record the agreed adjustments, and keep them under review. • Adjust our deadlines when
--	---	--	---	---

			to help distinguish service issues from complaints, and to support early resolution.	someone needs more time because of a disability, ensuring they have the time and support required during the complaints process.
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	Our policy states that stage 1 complaints must be acknowledged within five working days of receipt. We use an automated system within our database that alerts the investigating manager as deadlines approach. Timescales are calculated from the date the complaint is received, with progress centrally visible and actively monitored. We regularly scrutinise our performance against this target,	

			report on compliance, and identify learning where timescales have not been met.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our policy states that stage 1 complaints must be responded to within 10 working days of the complaint being acknowledged. We use an automated system within our database that alerts the investigating manager as deadlines approach. Timescales are calculated from the date the complaint is acknowledged, with progress centrally visible and actively monitored. We regularly scrutinise our performance against this target, report on compliance, and identify	

			learning where timescales have not been met.	
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 issue are completed. Outstanding actions must still be tracked and actioned	Yes - with further improvements planned	Our Standard Operating Procedures state: Do not wait for follow up actions relating to the complaint to be completed before responding. Using the portal, follow up in	Although actions are tracked, this remains at a local level. Phase 2 of our complaints redesign seeks to ensure greater central visibility of

	promptly with appropriate updates provided to the resident.		writing to the complainant (and/or their advocate). The response must: • Summarise the complaint, including complaint stage, reference number and key points raised. • Confirm whether you agree with the Stage 1 complaint outcome, or believe the outcome should be different, and if so, what you think it should be. • Where relevant, detail actions both taken and planned to put things right, with timeframes • Provide clear reasons for any action or decisions, referencing relevant policy, laws and good practice where appropriate.	progress in completing actions raised in response to complaints.
6.7	Landlords must address all points raised in the complaint definition and provide clear	Yes	This is standard practice and included within our procedure and	

	reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		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	Our policy states: <i>Adding to a Complaint</i> Where a complainant raises additional complaints during an investigation, these will be incorporated into the stage 1 response if related and that response has not been issued. Where the stage 1 response has been issued, or the new issues are unrelated to those already being investigated, or it would unreasonably delay the response, the new issues must be logged as a new complaint.	
6.9	Landlords must confirm the following in	Yes	This is included in our template	

	writing to the resident at the completion of stage 1 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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.		response letter and evidenced by our internal review of complaints responses.	
--	--	--	--	--

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	Yes	This is covered by our procedure	

	of the landlord's procedure. Stage 2 is the landlord's final response.			
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 policy states that stage 2 complaints must be acknowledged within five working days of receipt. We use an automated system within our database that alerts the investigating manager as deadlines approach. Timescales are calculated from the date the complaint is received, with progress centrally visible and actively monitored. We regularly scrutinise our performance against this target, report on compliance, and identify learning where timescales have not been met.	
6.12	Residents must not be required to explain their reasons for requesting a stage 2	Yes	We have made our policy clearer to demonstrate this.	

	consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		Wherever possible, we seek to understand how the complaint can be resolved to the complainant's satisfaction.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	In accordance with our procedure, Stage 1 complaints are investigated by a manager, while Stage 2 complaints are investigated by a senior manager.	
6.14	Landlords must issue a final response to the stage 2 complaint <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Our policy states that stage 2 complaints must be responded to within 20 working days of the complaint being acknowledged. We use an automated system within our database that alerts the investigating manager as deadlines approach. Timescales are calculated from the date the complaint is	

			acknowledged, with progress centrally visible and actively monitored. We regularly scrutinise our performance against this target, report on compliance, and identify learning where timescales have not been met.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	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 and clear reasons for the delay.	
6.16	When an organisation informs a resident about an extension to these timescales,	Yes	The Ombudsman's contact details are included on our 'Delay in	

	they must be provided with the contact details of the Ombudsman.		response' letter template for complaints related to our housing operations.	
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 – with further improvements planned	Our Standard Operating Procedures state: Do not wait for follow up actions relating to the complaint to be completed before responding. Using the portal, follow up in writing to the complainant (and/or their advocate). The response must: - Summarise the complaint, including complaint stage, reference number and key points raised. - Confirm whether you agree with the Stage 1 complaint outcome, or believe the outcome should be different,	Although actions are tracked, this remains at a local level. Phase 2 of our complaints redesign seeks to ensure greater central visibility of the progress in completing actions raised in response to complaints.

			and if so, what you think it should be. • Where relevant, detail actions both taken and planned to put things right, with timeframes • Provide clear reasons for any action or decisions, referencing relevant policy, laws and good practice where appropriate.	
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 standard practice and included within our procedure and evidenced in our letter template.	
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;	Yes	This is included in our template response letter and evidenced by our internal review of complaints responses.	

	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 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	Stage 2 represents our final response, as set out in our policy. It is prepared with input from all relevant staff to ensure a comprehensive and well-informed outcome.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a	Yes	This is embedded within our	

	landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • 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.		approach, with prompts in our response letter templates to include findings, rationale, and any further actions to be taken.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Using our psychologically informed, person-centred framework—the Beacon—we work collaboratively	

			with clients and tenants to identify remedies that are meaningful and have a genuine impact in relation to the issues they have raised. As part of our complaints redesign project, we now ask complainants at the outset what outcome they are seeking from their complaint. This helps us better understand their expectations and provides a clear starting point for reaching an appropriate and balanced resolution. This forms part of the wider redesign principle of strengthening a more resolution-focused approach to complaint handling.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate.	Yes – with further improvements planned	Response letters set out what will happen and by when.	Although actions are tracked, this remains at a local level. Phase 2 of our complaints

	Any remedy proposed must be followed through to completion.			redesign seeks to ensure greater central visibility of the progress in completing actions raised in response to complaints.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We take full account of Ombudsman guidance when determining appropriate remedies, using it to inform and underpin our approach.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Yes	Our Annual Complaints Performance and Service Improvement Report is produced in line with the requirements of the Code and is subject to appropriate scrutiny and challenge. It includes: • Our annual self-assessment against the Code, ensuring our complaints handling policy remains fully compliant with its requirements. • Qualitative and quantitative analysis of our complaint handling performance. • A summary of the types of complaints that have not	

	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.		been accepted. - The service improvements implemented as a result of learning from complaints. Where applicable, the report will also include: - Any findings of non-compliance with the Code identified by the Ombudsman. - Any annual performance report issued by the Ombudsman. - Any other relevant reports or publications produced by the Ombudsman relating to our services. During 2024/25, we further strengthened our processes to ensure that we accurately record	
--	---	--	---	--

			instances where issues are not accepted as complaints, as well as tenant service requests that are resolved at an early stage.	
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Our annual complaints report is reviewed and approved by our Service Quality Committee and Board, alongside our annual self-assessment against the Housing Ombudsman Complaint Handling Code. These are published on our website within the complaints section. They are accompanied by our Board's response, provided through our Member Responsible for Complaints (MRC), and our Tenants' Annual Complaints Review, ensuring that both governance oversight and tenant perspectives are clearly reflected.	

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	No significant restructure, merger, or procedural change impacting the complaints process has taken place during the reporting period. Should any such changes occur, we would undertake a self-assessment in line with the requirements of the Code to ensure continued compliance.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply with any requirement to review and update our self-assessment following an Ombudsman investigation.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.	Yes	We will comply with this requirement if applicable.	

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	We are committed to looking beyond the circumstances of individual complaints to identify wider learning and opportunities for service improvement. This approach is embedded within our continuous improvement culture. Our policy reflects this commitment: “We welcome complaints because they help us improve. When someone takes the time to tell us something hasn’t gone well, it gives us a chance to put things right—not just for them, but for others too. Complaints help us identify where things may not be working	Although service improvements are tracked, this remains at a local level. Phase 2 of our complaints redesign seeks to ensure greater central visibility of the progress in completing service improvement actions raised in response to complaints.

			as they should, and they support us in learning, growing, and delivering better services.” To support this, themes arising from complaints and complaint handling are identified through a monthly review at the Operational Leadership Team meeting, attended by all Heads of Service and other senior managers. This ensures that learning is regularly discussed, shared and acted upon across the organisation. In addition, our monthly Client and Tenant Update meetings provide a further opportunity to review complaint themes, agree and monitor actions, and share examples of positive outcomes. Our Board sub-committee, the	
--	--	--	--	--

			Service Quality Committee, also reviews complaints and complaints performance three times a year, including performance against the Code. This provides additional oversight and assurance that learning is translated into meaningful service improvements.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes – with further improvements planned	We promote a positive complaint handling culture by recognising complaints as a valuable source of insight to drive service improvement. Through our person-centred approach, regular review of complaint themes, and strong governance oversight, we ensure that learning from complaints is used to identify emerging issues and inform meaningful, continuous improvements in service delivery.	Although service improvement actions are tracked, this remains at a local level. Phase 2 of our complaints redesign seeks to ensure greater central visibility of the progress in completing actions raised in response to complaints.
9.3	Accountability and transparency are also	Yes	We submit an annual complaints	

	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.		report to the Service Quality Committee and Board for review, outlining key themes and organisational learning. A tailored tenant report is also produced, which is shared with all tenants and published on our website. In addition, our Client/Tenant Involvement Lead conducts an annual scrutiny review of complaints with clients and tenants.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Manager, Operational Support, leads on the development and delivery of complaints reporting, ensuring that analysis identifies key themes, trends, and emerging systemic issues. This includes highlighting areas of potential serious risk, as well as identifying where policies and procedures may	

			require review or improvement. These insights are reported to the Operational Leadership Team, the Service Quality Committee, and the Board, providing appropriate oversight, scrutiny, and a clear framework for driving service improvement and organisational learning. This work is further strengthened by the involvement of a Client/Tenant Involvement Lead, ensuring that client perspectives are reflected in our approach and continuous improvement activity.	
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	Yes	We have a designated Board Member Responsible for Complaints (MRC). Complaints are reviewed through	

	as the Member Responsible for Complaints ('the MRC').		the Board's Service Quality Committee, which meets 3 times a year, and by the 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, including data and insights, through the Service Quality Committee. The complaints function is supported by the Manager, Operational Support, who has day-to-day oversight, along with a Complaints Administration Team and the Client/Tenant Involvement Lead.	
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;	Yes	The Service Quality Committee provides regular oversight of complaints, including service improvements identified through complaint handling, as a standing agenda item. It also oversees an	

	b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.		annual complaints review. Through this framework, the MRC and the governing body receive comprehensive and regular assurance on complaints performance, trends and learning, outcomes of Ombudsman investigations, and progress against any required actions, as well as an annual report on complaints performance and service improvement.	
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	Yes	We adopt a collaborative and co-operative approach to complaint handling, ensuring the most appropriate person manages each complaint while working jointly across teams and partners. We promote shared responsibility rather than blame, supported by a	

	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.		commitment to continuous learning and improvement. Our approach is resolution-focused, aiming to address concerns fairly and effectively, and is underpinned by our values, as set out in our Beacon framework, and aligned with relevant regulatory and professional standards.	
--	---	--	--	--