

Housing Ombudsman Complaint Handling Code: London Borough of Croydon Self-assessment (2024-25)

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaint's performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

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	The Complaints Policy includes this definition of a complaint at section 2.4.	Complaints Policy updated in September 2024.
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 have recently added section 1.3 to the Complaints Policy to states that a resident does not have to use the word 'complaint' or ask to make a complaint. Section 1.2 of the Complaints Policy states, anyone who is affected by our services can make a complaint. This includes: <ul style="list-style-type: none"> • Residents • People who work or visit the borough • Local businesses • Community groups • Any person/s acting on behalf of an individual or group of individuals (provided that the person affected has given their written consent). 	
1.4	Landlords must recognise the difference between a service request and a complaint.	Yes	Complaints Policy updated in September 2024.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		<p>Section 2.4 confirms the definition of a complaint</p> <p>Section 2.8 highlights the difference between a service request and a complaint</p> <p>Staff have been trained to understand the difference between service requests and complaints and aim to resolve service requests as quickly as possible</p>	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints are raised when the resident expresses dissatisfaction with a service request. These are logged on the Infreemation complaints system.	
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	Phone satisfaction surveys are completed by conducted by Acuity. We treat satisfaction surveys as an opportunity to improve our services and follow up with individuals. Residents are signposted to the complaints process if they are unhappy.	Residents who express dissatisfaction are contacted to discuss the issue and are able to raise a complaint if appropriate.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Our policy clearly states that complaints will be accepted unless there is a valid reason not to do so. Exceptions are set out in the Complaints Policy at section 4.	
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: <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	Section 2.10 of Complaints Policy advises that complaints should be made to the Council within 12 months of when a customer feels that something has gone wrong. If it is longer the Council may ask customers to explain why they could not complain sooner. Section 4 of Complaints Policy lists the exceptions under which we would not consider a complaint	
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	Yes	This is included at section 2.10 in the Complaints Policy	We use discretion to accept complaints made outside this time limit if appropriate.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<p>Section 4 of the Complaints Policy lists exclusions.</p> <p>If a complaint is not accepted, we will provide a full explanation to the resident</p> <p>Section 3.6.3 states where we refuse to escalate a complaint to stage 2, we will send a letter to the resident to explain our reasons for this. Where we have declined to escalate a complaint to Stage 2, we have communicated this in writing to the resident and signposted them to the relevant Ombudsman.</p>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint is considered on an individual basis	

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>Complaints do not have to be made in writing. Residents can complain using the following methods:</p> <ul style="list-style-type: none"> • The Council's complaint form (on-line) • By letter • By email • By telephone • On audio-tape • In different languages <p>Residents may make contact via social media, but complaints will not be recorded and responded to via Social Media channels. Any resident expressing a dissatisfaction and wishing to make a complaint will be referred to the Complaints process.</p>	Section 2.11 in the policy states all complainants are treated fairly regardless of a person's protected characteristics under the Equality Act 2010. The council will provide information in a way which is clear, accessible and in an appropriate format
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	As detailed in 3.1 above - residents can make complaints to any member of staff in any way they wish to do so	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low	Yes	We consider complaints as feedback on our performance and look for opportunities for improvements in all areas and not	In focus groups held in October 2024, residents fed back that they found it easy to make a complaint.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaint volumes are potentially a sign that residents are unable to complain.		just those that have a high volume of complaints	
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	The Complaints Policy is published on our complaints web page and we request that individuals get in touch if they require a more accessible format	
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 Complaints Policy outlines the different ombudsman schemes and how to contact them. Section 2.2 also confirms the Policy is published on the Council's website.	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Section 1.2 of the Complaints Policy states that a complaint can be considered by any person/s acting on behalf of an individual or group of individuals (provided that the person affected has given their written consent).	
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	Section 3.7 of the Policy advises residents of how to engage with the relevant ombudsman schemes. We also advise residents of their right to escalate complaints to the ombudsman at stage 1, stage 2 decisions, when we notify of	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			complaint delays and when we refuse to escalate a complaint.	

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	<p>The Customer Insight Manager has oversight of all Housing complaints and works closely with the corporate Complaints Resolution Manager.</p> <p>Repairs stage 1 complaints are managed by a dedicated team and other complaints are managed by designated complaints officers.</p> <p>Stage 2 complaints and Housing Ombudsman enquiries and complaints are managed by the corporate complaints team.</p>	
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	Complaints Officers have authority to facilitate the resolution of complaints and escalation processes to Director level are in place.	
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	Yes	We have designated complaints officers within each of our service divisions who are responsible to complaint handling. Officers are provided with training on effective complaint handling.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must be resourced to handle complaints effectively		<p>We carry out training workshops with service teams and hold complex case forums to encourage a culture of learning.</p> <p>Bi-weekly meetings are held on Housing Ombudsman cases and learning.</p>	

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	<p>We have a single policy and the Complaints Policy is published on our website.</p> <p>We see complaints as an opportunity to put things right and residents are not treated differently if they complain.</p>	
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 aim to resolve all complaints within timescales and have a 2 stage complaints process as set out at 3.1 of the Complaint Policy.	
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	We have a 2 stage complaints process as set out in the Complaints Policy	
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	Where any part of the response is handled by a third party this is treated as part of the two-stage process.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	If we did use a third party this would be part of the agreement with them	No complaints were referred to third parties during 2024-25.
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	When complaints are acknowledged, we set out our understanding of the complaint and what the complainant has requested in order to resolve the complaint.	Our complaint form requests that a complainant to confirms their desired outcome of a complaint. Direct discussion with the customer to establish a clear understanding of the complaint and desired outcome is encouraged.
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	As at 5.6, the acknowledgement is clear about what aspects of the complaint will be investigated and which we are not responsible for.	
5.8	At each stage of the complaints process, complaint handlers must: 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.	Yes	Our designated complaints officers and the corporate complaints team are provided with effective complaint handling training prior to investigating complaints which includes the requirements set out in this Code	
5.9	Where a response to a complaint will fall outside the timescales set out in this	Yes	Section 3.5.9 and 3.6.5 states where we are unable to respond to	Any variations to timescales are agreed with the resident

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		a complaint in time we will keep the resident up to date on the progress of their case.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	We make reasonable adjustments in line with the Equality Act 2010 and record this.	The NEC housing system has been reviewed to improve the resident information we hold on protected characteristics and further details of health and other support 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 section 2 of this Code.	Yes	Section 4 of the Complaint Policy sets out that we do not refuse to escalate complaints through the process unless there is a valid reason and we explain the reason to the resident.	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	We record all details relating to a complaint on our Infreemation complaints management system	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process.	Yes	A remedy may be officered at any stage of the process. See section 3.5.11 of the policy	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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 Unacceptable Behaviour Policy in place.	
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 will consider each individuals circumstances before making a decision to restrict contact. This is covered within the Unacceptable Behaviour Policy.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>We encourage all complaints to be acknowledged over the telephone with an aim to try and resolve the complaint as quickly as possible.</p> <p>We assess each case on its own merits whilst taking into consideration an individual's personal circumstances and aim to resolve the complaint as quickly as possible.</p>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	Stage 1 complaints are logged and acknowledged within 5 working days.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	Our policy sets out that we respond to all stage 1 complaints within 10 working days - Section 3.5.7	<p>During 2024-25 we did not meet the 10 day timescale in most cases. This is due to:</p> <p>1) The performance data for timescales for stage 1 and stage 2 complaints responses is lower than actual performance due to the complaints system not being</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>configured for extensions and an acknowledgement.</p> <p>System changes were implemented from 1 April 2025 which will allow accurate reporting.</p> <p>2) We have experienced increased volumes of complaints and required increased resources to manage these. Additional staffing has been budgeted for, and recruitment will start in September 2025.</p>
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	<p>We communicate to complainants when an extension is required in order to respond to a complaint, and we agree with them how often we will keep them updated on progress.</p> <p>Section 3.5.9 confirms an extension to the timescale will not exceed 10 working days</p>	
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	Section 3.5.9 confirms an extension to the timescale will not normally exceed 10 working days.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			Residents are provided with details of the Housing Ombudsman.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>We issue a response to complaints as soon as we are able to clarify the actions to put matters right.</p> <p>We track and monitor any actions to ensure the case is seen through to resolution.</p>	
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	Our templates require investigating officers to address each complaint point separately to resolve the complaint	
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	We would consider additional complaints in line with the requirements of the Code	
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; 	Yes	The complaint response letters cover each of these expectations.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		All complaints officers use templates to formulate responses in line with this requirement.	

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.		Our policy reflects this.	
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	The Complaints Policy sets out at 3.6.4 that all complaints are acknowledged within 5 working days	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	As is the Ombudsman's guidance to capture what we can do to put matters right for a complainant, it is imperative to understand why a resident is unhappy for us to reach the desired outcome. Therefore section 3.5.13 of the policy encourages residents to explain why they remain unhappy, however this is not a mandatory requirement to escalate a complaint	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage 1 complaints are investigated by the individual service areas whereas Stage 2 complaints are investigated independently by the corporate complaints team	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	No	Our Complaints Policy confirms the timescale to respond to stage 2 complaints is 20 working days	<p>During 2024-25 we did not meet the 20 day timescale in most cases. This is due to:</p> <p>1) The performance data for timescales for stage 1 and stage 2 complaints responses is lower than actual performance due to the complaints system not being configured for extensions and an acknowledgement.</p> <p>System changes were implemented from 1 April 2025 which will allow accurate reporting.</p> <p>2) We have experienced increased volumes of complaints and required increased resources to manage these. Additional staffing has been budgeted for and recruitment will start in September 2025.</p>
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	Yes	<p>Extensions to respond to a complaint are in line with the code</p> <p>3.6.5 of the Complaints Policy states that if a complaint is complicated and likely to take longer to resolve the</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the reason(s) must be clearly explained to the resident.		investigating officer will set and agree a revised timescale, of no more than 20 working days as an extension, and keep the resident up to date on its progress.	
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	Our holding letters at stage 2 include referral rights to the relevant ombudsman scheme	
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	We issue a response to complaints as soon as we are able to clarify what we aim to do to put matters right. For stage 2 and Ombudsman cases we track and monitor any actions to ensure the case is seen through to resolution.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our templates require investigating officers to address each complaint point separately to resolve the complaint	
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	All complaints officers use templates to formulate responses to stage 2 complaints as per the guidance issued by the Ombudsman	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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	The Complaints Policy sets out that we have a two stage process with stage two being the final stage. Complex case meetings are held when the response and actions involve staff from a number of teams.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> • Apologising • Acknowledging where things have gone wrong 	Yes	Template response letters include the actions that have and/or will be taken to put things right.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> • 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 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Remedies are in line with the Ombudsman guidelines.</p> <p>There are compensation guidelines in place.</p>	
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	<p>We ensure our complaint responses clearly set out our proposal on what we aim to do and when.</p> <p>The service areas track actions through to completion.</p>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We take account of guidance issued by the Ombudsman when deciding on appropriate remedies.	This is reflected in an increase in findings of reasonable redress in Ombudsman determinations.

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 complaints e. any annual report about the landlord's performance from the Ombudsman f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Our Annual Performance report includes these parameters and is published on our webpage. The report for 2024-25 has been drafted and will be considered by the governing body in September 2025.	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's	Yes	The report for 2024-25 has been drafted and will be considered by the governing body in September 2025 who will also agree their response.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	response to the report must be published alongside this.		These will be published on the website along with the self-assessment.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		There was no significant restructure, merger and/or change in procedures during 2024-25.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		This request has not been made by the Ombudsman in 2024-25.	
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.		We have not had exceptional circumstances during 2024-25.	

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 record lessons learnt and implement any changes required.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	We use feedback from complaints as an opportunity to drive improvement	
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 provide monthly, quarterly and annual reports to key stakeholders. During 2024-25 we have reported to the resident Customer Influence and Assurance Panel, Scrutiny and Overview Committee, Cabinet and Housing Improvement Board.	
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 Customer Insight Manager is the lead person for complaint handling for housing landlord services with oversight by the Head of Housing Improvement, Regulation and Performance.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Cabinet Member for Homes is the appointed Member Responsible for Complaints.	
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 performance reports and monthly meetings take place between officers and the Member Responsible for Complaints.	
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 d. annual complaints performance and service improvement report. 	Yes	Reports issued to the governing body are in line with the guidance in the Code	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	We have objectives in relation to complaint handling for all employees who deal with complaints	