

# **Housing Ombudsman Complaint Handling Code - Self-assessment form**

### **Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  '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.'	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Definition in full in paragraph 3.3 of policy

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.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	This is outlined in paragraph 3.2.
	A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.			This is outlined in paragraph 6.1
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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	This is outlined in paragraph 3.2 and 3.2.1

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 policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	This is explained in paragraph 3.2
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	As outlined in explanation	Customers who give negative feedback via transactional surveys regarding the service they have received are contacted to discuss any concerns raised and resolve at point of contact to the customer's satisfaction. If this is not able to be achieved, then a formal complaint will be logged.  From April 2024 – our Quarterly Customer Research Service Testing surveys will include details on how to make a complaint.

#### **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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Explained in paragraphs 3.4 and 3.5
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:	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Exclusions are outlined in paragraph 3.5

	<ul> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and</li> </ul>			
	Particulars of Claim, having been filed at court.  Matters that have previously been			
	considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 3.5 clarifies this

	discretion to accept complaints made outside this time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 3.5.1 explains this
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 3.4 explains this

### **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	Complaints policy – https://www.greatwellhomes.org.uk/downloads/custome r-complaints-policy/  Reasonable Adjustments Policy and Procedure in place https://www.greatwellhomes.org.uk/downloads/reasona ble-adjustments-policy/ https://www.greatwellhomes.org.uk/downloads/reasona ble-adjustments-procedure/	Paragraph 5.2 details that complaints can be made via our website, customer portal, social media, email, telephone or in person to a staff member.  Paragraph 6.1 explains complaints can be made via a third party.  When managing a complaint, our Complaints Resolution Officer, will clarify with our customer if there are any reasonable adjustments required, and if so, what they are and then managed in line with our Reasonable Adjustments policy and procedure.
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	Yes	As outlined in explanation	All staff have been updated on our revised Complaints Handling Policy and Procedure via our intranet.  New starters are provided with this information as part of their induction.

	complaint to the appropriate person within the landlord.			
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	As outlined in explanation	Complaint volumes and learning are published monthly in our enewsletter and within our 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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Policy is available on website which has an accessibility tool to assist customers.  We have posters in Independent Living schemes explain how to access policy.  A printed copy of our complaints policy is sent to customers on request.  Monthly customer e-newsletter has regular update including link to our complaints policy.
3.5	The policy must explain how the landlord will	Yes		Paragraph 4.1 outlines how we publicise to our customers.

	publicise details of the complaints policy, including information about the Ombudsman and this Code.		Complaints Policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Paragraph 3.3 provides details of the Ombudsman Code.
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.		Complaints Policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Paragraph 6.1 outlines compliance with this requirement.
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	Complaints Policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a> Complaints page on website - <a href="https://www.greatwellhomes.org.uk/how-to-make-a-complaint/">https://www.greatwellhomes.org.uk/how-to-make-a-complaint/</a>	Paragraph 3.5.2

**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	We have a dedicated Complaints Resolution Officer, supported by Customer Services Manager who is responsible for the delivery of our complaint handling service.  The Head of Customer Excellence is the nominated point of contact for the Housing Ombudsman service.  Our senior lead person accountable for complaint handling is Chris Holloway – Executive Director  Our Board lead member responsible for complaints is the Chair of our Audit & Risk Committee (Mona Shah)	In addition, we have additional staff members trained within our Customer Excellence management team to assist with the management of complaints to ensure adequate capacity and resources are available.
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	Yes	There are clear expectations across the organisation regarding that all staff are supportive of the resolution of complaints regardless of their role or seniority within the organisation.  A shared objective is in place, to further embed this expectation.	Shared Objective:  Effective Complaint Management: All staff to work co-operatively with colleagues and customers to resolve customer complaints – demonstrating a professional and empathetic approach to supporting resolutions.

	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	As outlined in explanation	A dedicated Complaints Resolution Officer is in place with additional capacity via additional staff trained to support the management and resolution of complaints.

### **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	Complaints Policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Policy in place
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.		Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Greatwell Homes has a 2-stage process in line with the expectations of the Code as outlined in section 7 of our 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	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	

	access to the Ombudsman.			
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	As outlined in explanation	All complaints are fully owned and managed by Greatwell Homes staff who in turn liaise with third parties where appropriate to resolve a customer complaint.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	n/a	As outlined in explanation	Complaints are not passed to third parties.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the	Yes	As outlined in explanation	A standard template is in place to ensure that clarity is gained from the complainant, and this is then confirmed in writing within the stage 1 or 2 acknowledgement letter.

	complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.			
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 outlined in explanation	This is noted for reference for complaint handler within standard acknowledgement template.
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.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Paragraph 3.4 sets this out

	(c) take measures to address any actual or perceived conflict of interest; and (d) consider all relevant information and evidence carefully.			
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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Stage 1 – paragraph 7.1.5 clarifies.  Stage 2 – paragraph 7.2.5 clarifies
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	Yes	Reasonable adjustments policy & procedure in place  https://www.greatwellhomes.org.uk/downloads/reasona ble-adjustments-policy/  https://www.greatwellhomes.org.uk/downloads/reasona ble-adjustments-procedure/	Reasonable adjustments are logged on complaints database and managed in line with our policy & procedure.

	reasonable adjustments must be kept under active review.			
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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Paragraph 3.5 clarifies
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	As outlined in explanation	Each complaint is logged and given a unique reference number and an electronic file created using this number.  All documentation relating to the complaint and subsequent investigation is saved within this file.

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/custome-r-complaints-policy/</a>	Over-riding aims of policy is to investigate complaints and put things right in a timely manner.
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	Complaints policy https://www.greatwellhomes.org.uk/downloads/custome r-complaints-policy/  Unacceptable Behaviour policy https://www.greatwellhomes.org.uk/downloads/unaccep table-behaviour-policy/  Unacceptable Behaviour procedure https://www.greatwellhomes.org.uk/downloads/unaccep table-behaviour-procedure/	Paragraph 3.6 in complaints policy gives overview on approach in managing unacceptable behaviour.  Stand-a-lone Unacceptable Behaviour policy in place with supporting procedure.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	As outlined in explanation	As outlined in both our Complaints Policy and Unacceptable Behaviour policy – due regard will be given to underlying health issues and support needs.

for the provisions of		
the Equality Act 2010.		

# **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	Yes	As outlined in explanation	Our complaint handling staff are trained to recognise which complaints can be dealt with quickly to resolve the matter to the satisfaction of the complainant to avoid unnecessary delays in resolving the issue.  The individual needs of customers are taken into account, utilising our records retained on our housing management system to better understand any pre-known vulnerabilities. In addition, the complaint handler will ascertain if there are any vulnerabilities and reasonable adjustments that need to be put in place.

	resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.1.1 outlines this timescale, and complaints are logged and tracked on complaints database to ensure oversight and compliance.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.1.3 outlines this timescale, and complaints are logged and tracked on complaints database to ensure oversight and compliance.
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	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.1.5 clearly outlines this requirement.  Any extension is recorded and tracked on complaints database to ensure oversight and compliance.

	reason(s) must be clearly explained to the resident.			
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	As outlined in explanation.	The Ombudsman details are included in standard extension template to ensure compliance.
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	As outlined in explanation	When the complaint investigation has been undertaken and resolutions identified the complaint resolution letter is sent clearly outlining any actions that remain outstanding.  These are logged onto a Complaints Resolution action tracker with a named owner responsible for ensuring completion of the action along with agreed timescale for the resolution to the complaint to be actioned.  The Complaints Resolution Officer monitors the tracker, and the Customer Experience Manager presents the tracker to the Operational Management team at their 6-weekly meetings, attended by Executive Director to ensure

				oversight across the organisation is maintained.
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	As outlined in explanation	The complaints standard template guides the Complaints Resolution Officer to ensure all requirements are fully covered in line with the expectations laid out in section 6.7.
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	Yes	As outlined in explanation	The Complaints Resolution Officer is aware of this requirement and ensures adherence to section 6.8.

	logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. 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	Yes	As outlined in explanation	A stage 1 template is in place to guide Complaints Resolution Officer and ensure response covers all requirements as laid down in the Code.

escalate the		
matter to		
stage 2 if the		
individual is		
not satisfied		
with the		
response.		

#### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	As outlined in explanation	Stage 1 letter template clearly outlines right to escalate to Stage 2.  Stage 2 template clearly outlines this is final response and right to contact Housing Ombudsman for a free, impartial review.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.2.3 outlines this requirement and escalation requests are logged and tracked on complaints database to ensure compliance and oversight is maintained to ensure deadlines are met.

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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Staff are aware if an escalation request is made that an explanation is not required at the point of making the request.  Where clarity has not been given the complainant will be contacted to discuss what they remain unhappy about as outlined in 7.2.1.1
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.2.3 clearly sets this out to ensure fairness and impartiality and avoid any conflicts of interest.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.2.4 clearly sets this requirement out. Stage 2 escalations are tracked on the complaints database to ensure compliance.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of	Yes	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.2.5 clearly sets this requirement out and will be logged and tracked on the complaints database.

	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.			
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	Complaints policy <a href="https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/">https://www.greatwellhomes.org.uk/downloads/customer-complaints-policy/</a>	Paragraph 7.2.5 also notes that the Housing Ombudsman contact details will be provided.
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	Yes	As outlined in explanation	When the complaint investigation has been undertaken and resolutions identified the complaint resolution letter is sent clearly outlining any actions that remain outstanding.  These are logged onto a Complaints Resolution action tracker with a named owner responsible for ensuring completion of the action along with agreed timescale for the resolution

	and actioned promptly with appropriate updates provided to the resident.			to the complaint to be actioned and updates provided at agreed timescales where relevant until the matter is fully concluded.
	resident.			The Complaints Resolution Officer monitors the tracker, and the Customer Experience Manager presents the tracker to the Operational Management team at their 6-weekly meetings, attended by Executive Director to ensure oversight across the organisation is maintained.
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	As outlined in explanation	A stage 2 template outlines these requirements to ensure compliance.
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.	Yes	As outlined in explanation	This requirement is covered in the Stage 2 template to ensure compliance.

	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 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	Yes	As outlined in explanation	The final response is clearly noted in Stage 2 template letter and all complaint handling staff are aware of the need to undertake a robust investigation and obtain and retain on the complaint file all necessary

needed to issue	supporting information from
such a response.	across the organisation, and from
•	third party contractors where
	necessary, to complete their
	investigation and make
	determination.

### **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:  a. Apologising.  b. Acknowledging where things have gone wrong.  c. Providing an explanation, assistance or reasons.	Yes	As outlined in explanation	Complaint handling staff are aware of the importance of acknowledging where there has been a service failure and offering an appropriate remedy in line with the Ombudsman Remedies Guidance. https://www.housing-ombudsman.org.uk/wp-content/uploads/2023/10/04Guidance-Remedies-1.pdf

	<ul><li>d. Taking action if there has been delay.</li><li>e. Reconsidering or changing a decision.</li></ul>			
	f. Amending a record or adding a correction or addendum.			
	g. Providing a financial remedy.			
	h. 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	As outlined in explanation  Compensation policy <a href="https://www.greatwellhomes.org.uk/downloads/compensation-policy/">https://www.greatwellhomes.org.uk/downloads/compensation-policy/</a>	Each complaint and resolution are revised on an individual basis, ensuring that each complaint resolution letter clearly evidences the basis of the remedy offered.  Where compensation is paid, it is made in line with our
7.3	The remedy offer must clearly set out what will happen and by when,	Yes	As outlined in explanation	Compensation policy.  Any remedy offered that is not actioned at the time of the complaint resolution letter being

	in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			issued is recorded on tracked on the Complaints Action tracker to ensure oversight until conclusion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	As outlined in explanation	Due regard is given to guidance issued by the Ombudsman on remedies to ensure compliance.

### **Section 8: Putting things right**

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:			
0.1	the annual self- assessment against this Code to ensure their complaint handling policy remains in line with its requirements.	Yes	As outlined in explanation.	Board report presented to the Chair of Audit & Risk Committee who is the governing body member responsible for complaints (2 May 2024) inclusive of annual self-assessment against the revised complaint handling

		code that became effective on the
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.	As outlined in explanation	1 April 2024.
any findings of non- compliance with this Code by the Ombudsman.	None issued.	
the service improvements made as a result of the learning from complaints.	As outlined in explanation	
any annual report about the landlord's performance from the Ombudsman; and	None issued.	
any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	None issued.	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		Presented to full main Board - 23 May 2024.  Board's response to report published on website
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Noted	Requirement noted, but currently not applicable.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Noted	Requirement noted, but currently not applicable.	
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	Noted	Requirement noted, but currently not applicable.	

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.		

# 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	Service improvements made are outlined in our Complaints Performance & Service Improvements report	
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	Yes	As outlined in explanation	All staff have a shared objective to support the management of customer complaints and embed importance of listening and acting on customer concerns:  Effective Complaint Management: All staff to work co-operatively with colleagues

	introduce positive changes in service delivery.			and customers to resolve customer complaints – demonstrating a professional and empathetic approach to supporting resolutions.
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	Performance updates are scheduled quarterly to our Customer Assembly and Audit & Risk Committee, which our member responsible for complaints (MRC) chairs.  In addition, we information is share on our website and customer e-newsletter to promote wider learning - <a href="https://www.greatwellhomes.org.uk/you-said-we-did/">https://www.greatwellhomes.org.uk/you-said-we-did/</a>	Learning from complaints is reported and discussed at our Customer Assembly meeting (strategic customer group) on a quarterly basis.  Complaint volumes, trends and learning are discussed at both Senior Management Alliance meetings and Operational Management meetings.  Our monthly e-newsletter provides an update to customers on learning and service improvements.  Customer website also promotes service changes following customer complaints.  Overview of complaints are included in our annual report.
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	Yes	Executive Director is senior lead accountable – details on our website to inform customers <a href="https://www.greatwellhomes.org.uk/how-to-make-a-complaint/">https://www.greatwellhomes.org.uk/how-to-make-a-complaint/</a>	

	potential systemic issues, serious risks, or policies and procedures that require revision.			
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	Board member who is Chair of our Audit & Risk Committee has lead responsibility for complaints and details are on our website to inform customers <a href="https://www.greatwellhomes.org.uk/how-to-make-a-complaint/">https://www.greatwellhomes.org.uk/how-to-make-a-complaint/</a>	
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	As outlined in explanation	Quarterly Audit & Risk Committee meetings are in place and will include a standing item relating to Complaint Handling Performance.  The annual Complaints Performance and Service Improvements report will be presented to the Audit & Risk Committee at the May meeting, in turn the Chair of ARC will present and discuss this to the main Board meeting at their May on an annual basis.
9.7	As a minimum, the MRC and the governing body			Quarterly Audit & Risk Committee meetings are in place and will

		include a standing item relating to
		Complaint Handling Performance,
a. regular updates	As outlined in explanation	as outlined in 9.7 (a, b, c) which
on the volume,		in turn will be shared with full
categories and		main board.
outcomes of		
complaints,		
alongside		The annual Complaints
complaint		Performance and Service
handling		Improvements report will be
performance.		presented to the Audit & Risk
b. regular reviews		Committee at their annual May
of issues and		meeting and in turn the Chair of
trends arising		ARC will present and discuss this
from complaint		with the full main Board at their
handling.		May meeting on an annual basis.
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.		
	categories and outcomes of complaints, alongside complaint handling performance.  b. regular reviews of issues and trends arising from complaint handling.  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement	receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.  b. regular reviews of issues and trends arising from complaint handling.  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement

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 are co-operative approach towards resolving complaints, working with colleagues across teams and departments.  b. take collective responsibility for any shortfalls identified througe complaints, rather than blaming others; and  c. act within the professional standards for engaging with complaints as so by any relevant professional body.	d g Yes	As outlined in explanation	Shared objective for all staff that will be discussed and reviewed at each staff member's regular 121's and annual appraisal.  Effective Complaint Management: All staff to work co-operatively with colleagues and customers to resolve customer complaints — demonstrating a professional and empathetic approach to supporting resolutions.  All staff are required to abide by the National Housing Federation's Code of Conduct
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