

CESSA Housing Association Ltd - Appendix A: Self-assessment form 2025

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 complaints 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 |
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| 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 | Evidenced by Policy T01H | Defined under 'Definition of a Complaint' |
| 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 | Evidenced by Policy T01H & complaints | Defined under 'Definition of a Complaint' and evidenced by the number of complaints received that refer to just wishing to raise their concerns or a service query. |
| 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 | Yes | Evidenced by Policy T01H & complaints | Defined under 'Definition of a Complaint'. Service Requests are monitored as part of the complaints monitoring process. However, the only formal complaint received by the Association in 2025 was not |

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| | recorded, monitored and reviewed regularly. | | | first raised as a Service Request first. |
| 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 | Evidenced by Policy T01H | Defined in the section '2 – Procedure – How a service request or a complaint can be made – Service Requests. |
| 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 | Evidenced by Policy T01H and concerns raised through the biennial tenant's satisfaction survey | Defined under 'Definition of a Complaint'. No concerns raised by the tenant's survey in 2025 have been treated as a complaint, though they are always followed up on where the tenant has provided contact information. |

Section 2: Exclusions

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Evidenced by Policy T01H | Evidenced under the section on 'Policy Aims & Objectives' with exclusions detailed under section '2 – Circumstances not covered by the complaints policy'. The only complaint received was considered on its merits and was not refused. |
| 2.2 | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. | Yes | Evidenced by Policy T01H | Defined under section '2 – Circumstances not covered by the complaints policy'. |

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| 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 | Evidenced by Policy T01H & complaints received | Defined under 'Policy Aims & Objectives'. The only complaint received was within 12 months of the issue occurring or the resident becoming aware of it. |
| 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 | Evidenced by Policy T01H | Defined under 'Policy Aims & Objectives'. No complaints were refused in 2025. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Evidenced by Policy T01H and by the action taken with the single formal complaint raised in 2025. | Defined under section '2 – Procedure – how a service request or a complaint can be made – Formal Complaints and Circumstances not covered by the complaints policy'. |

Section 3: Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Evidenced by Policy T01H and the 2025 complaint received. | Defined under section '2 – Procedure – how a service request or a complaint can be made'. The single complaint was received by email, which is the communication method preferred by the tenant. |
| 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 | Evidenced by Policy T01H; the way that they were received – the single complaint was received by email, and service requests were received via email, letter, in person and over the phone. Staff awareness is evidenced by the staff policy acknowledgement & recording process managed by the Tenant & Services Manager. | Defined under section '2 – Procedure – how a service request or a complaint can be made'. When reviewed all staff are provided with either a hard copy or link to the policy and then must respond to confirm that they have read and understood. |
| 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 | Evidenced by ratio of service requests to formal complaints | 11 service requests vs 1 Stage 1 complaints that was not raised first as a service request. |

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| 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 | Evidenced by Policy T01H & the associated Complaints Leaflet | The policy is published on the website together with the associated Complaints Submission Form that is available for tenants to use should they wish. Hard copies are available in each scheme's Information Folder, explained in the Tenants Handbook and electronically on request. |
| 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 | Evidenced by Policy T01H | Defined under section '2 – Policy Aims and Objectives' & section '3 – Further Information – The Housing Ombudsman Service'. |
| 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 | Evidenced by Policy T01H | Defined under section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1 – see also section '3 – Further Information – Use of Advocates'. |
| 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 | Evidenced by Policy T01H | Defined under section '3 – Further Information – The Housing Ombudsman Service'. |

Section 4: Complaint Handling Staff

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Evidenced by Policy T01H | The Complaints Officer is the Director of Housing |
| 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 | Evidenced by Policy T01H | The Complaints Officer is the Director of Housing (DoH), who is a senior member of staff and an executive director so has access to staff at all levels to facilitate the prompt resolution of complaints. DoH manages and controls the complaints data; monitoring actions taken and chasing updates as required. |
| 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 | Yes | Evidenced by Policy T01H | Defined in section '1 – Policy'. Covered and reviewed in staff 121s. |

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| | important that complaints are seen as a core service and must be resourced to handle complaints effectively | | | |
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Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | Evidenced by Policy T01H | |
| 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 | Evidenced by Policy T01H & by the service requests category of tenant concerns and by the fact that all 11 service requests were resolved to tenants' satisfaction, with none moving to Stage 1 of the complaints process | Defined under section '1 – Policy & Policy Aims and Objectives'. |
| 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 | Evidenced by Policy T01H | |
| 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. | N/A | Evidenced by Policy T01H | The Association handles all complaints in-house. |

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| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | N/A | Evidenced by Policy T01H | The Association handles all complaints in-house. |
| 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 | Evidenced by Policy T01H & by the single Stage 1 complaint in 2025. | Defined under section ‘2 – Procedure – how a service request or a complaint can be made – Formal Complaints – Stages 1 & 2’. |
| 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 | Evidenced by Policy T01H & by re-stating and setting out the concerns raised in the response letter to the (upheld) single complaint raised in 2025 (about a scheme cleaner doing private work during paid-for working hours). | There were no areas of the complaints received that the Association felt was not their responsibility to look into. |
| 5.8 | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and | Yes | Evidenced by Policy T01H and the single Stage 1 complaint received in 2025 which was upheld and closed to the tenant’s satisfaction. | |

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| | 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 | Evidenced by Policy T01H & 2025 complaint for which the response time was 10 working days. Service requests were responded to within an average of 6 working days. Both in accordance with policy. | |
| 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 | Evidenced by Policy T01H | Defined under section '1 – Policy Aims and Objectives' & 'Annex C' of the policy. Not required in 2025. |
| 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 | Evidenced by Policy T01H | No requests to escalate either a service request or a Stage 1 were received in 2025. There were no Stage 2 complaints raised. |
| 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 | Yes | Evidenced by the Complaints Handling Monitoring System and the Housing Management System | Recorded on the Complaints Handling system in P Drive and in the Housing Management System's Case filing cabinet |

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| | any relevant supporting documentation such as reports or surveys. | | | system for access by relevant staff only. |
| 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 | Evidenced by Policy T01H & by there being no escalations to Stage 2 in 2024. | The Association has a small team with frontline staff (most likely to deal with a service request made face-to-face by a tenant) having immediate access to the staff member with responsibility for Stage 1 complaints, & through them to their line manager, the Complaints Officer, who oversees Stage 2 complaints & all complaints processes. Daily updates are held between complaint dealing staff to ensure appropriate remediation and to answer concerns raised to tenants' satisfaction reducing their need to escalate their complaint. |
| 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 | Yes | Evidenced by Policy T02 – Anti-Social Behaviour Involving Tenants & its use. | There were 4 ASB cases raised by tenants and investigated in 2025. No restrictions were placed on these in 2025. |

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| | must keep restrictions under regular review. | | | |
| 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. | N/A | | Restrictions are not placed on contact due to unacceptable behaviour. |

Section 6: Complaints Stages

Stage 1

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Evidenced by Policy T01H & from the 2025 complaint resolution | |
| 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 | Evidenced by Policy T01H. The single complaint was acknowledged the same day it was received. | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'. |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged. | Yes | Evidenced by Policy T01H. The response time for the single complaint was 10 working days, this was due to having to gather evidence as to the member of staff's working practices from a number of sources. | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'. |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the | Yes | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can |

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| | 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. | | | be made – Formal Complaints – Stage 1’. Not required in 2025, but has previously been implemented (in 2023). |
| 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 | Evidenced by Policy T01H | Defined in section ‘2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1’. Not provided in 2025 as extensions to timescales were not required. |
| 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 | Evidenced by Policy T01H & the complaint response given to the single Stage 1 complaint in 2025. | Defined in section ‘2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1’. |
| 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 | Evidenced by Policy T01H & by responses provided to the 2025 Stage 1 complaint received with listed the concerns raised and gave an individual answer to each. | Defined in section ‘2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1’. |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the | Yes | Evidenced by Policy T01H | Defined in section ‘2 – Procedure – How a service request or a complaint can |

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| | 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. | | | be made – Formal Complaints – Stage 1’. No additional complaints issues were raised in 2025 during the complaints process. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Evidenced by Policy T01H & the response to the single Stage 1 complaint received in 2025. | Defined in section ‘2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1’. |

Stage 2

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Yes | Evidenced by Policy T01H | Defined in section ‘2 – Procedure – How a service request or a complaint can |

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| | 2 of the landlord's procedure. Stage 2 is the landlord's final response. | | | be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Evidenced by Policy T01H. The Tenant & Services Manager considers Stage 1 complaints and the Complaints Officer, the Director of Housing considers Stage 2. | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |

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| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |
| 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 | Evidenced by Policy T01H | Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025. |

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| 6.19 | <p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Evidenced by Policy T01H | <p>Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 complaints in 2025.</p> |
| 6.20 | <p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p> | Yes | Evidenced by Policy T01H & by the submission of a HOS complaint in 2023 | <p>Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'.</p> |

Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 7.1 | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. | Yes | Evidenced by Policy T01H & by the response to the single formal complaint in 2025 | Defined in section '1 – Policy – Policy Aims and Objectives'. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Evidenced by Policy T01H | Defined in section '1 – Policy – Policy Aims and Objectives'. |
| 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 | Evidenced by Policy T01H & by the response to the complaint about a member of staff's private working during paid-for working hours and subsequent action taken to ensure not repeated. | Defined in section '1 – Policy – Policy Aims and Objectives'. |

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| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Evidenced by Policy T01H | Defined in section '1 – Policy – Policy Aims and Objectives'. |
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Section 8: Self-assessment, reporting and compliance

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 8.1 | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | Evidenced by the Annual Self-Assessment; Complaints Performance and Service Improvement Report and Analysis Sheet provided to the MRC and the Association's Housing Committee annually in March. | |

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| 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 | Evidenced by publishing on the website following receipt of the governing body's response to the report provided by the MRC on their behalf. | |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | N/A | The Association experienced no significant restructure, merger and/or change in procedures in 2025 that affected their ability to comply with the Code. | |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | If requested, but not raised in 2024. | |
| 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. | N/A | The Association experienced no cyber incidents in 2025 that affected their ability to comply with the Code. | |

Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Evidenced by Policy T01H | Defined in section '1 – Policy – Policy Aims and Objectives'. Not applicable to the Stage 1 complaint, but improvements in communications regarding minor repairs carried out by an external contractor were made following a service request concern raised |
| 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 | Evidenced by Policy T01H & by the lessons learned section of the Tenants Annual Report that identifies areas for improvement | Defined in section '1 – Policy – Policy Aims and Objectives'. |
| 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 | Reported to tenants by the Tenants Annual Report and to the Housing Committee that includes tenant members | This information is then passed on to the Board for governance purposes. |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person | Yes | Evidenced by the frequent review of Policy T01H (Mar. '19, Oct '20, Nov. '22, Mar. '24, Jan. | The Director of Housing & the CEO assess any themes or trends to identify |

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| | must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | | '25 & Dec. '25 – the latter to add in details of the Energy Ombudsman for any heat network-related complaints). | potential systemic issues quarterly when compiling the MRC report and annually when preparing the Financial Annual Report, the Tenants Annual Report and submitted Governance Complaint Performance reports to the Board (via the MRC). |
| 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 | Evidenced by there being a MRC on the Committee of Management (the Board) and the provision of quarterly complaints update reports from the Complaints Officer | Position held by the Vice-Chair |
| 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 | Evidenced by minutes of meetings. | Provided annually in April with exceptions reported as required. |
| 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, | Yes | Complaint Performance reports issued quarterly and Complaints Performance and Service Improvement Report issued annually at the end of the | Quarterly reports issued throughout the year that includes regular reviews of issues and trends. Regular updates on the outcomes of the Ombudsman's |

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| | <p>alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> | | <p>previous financial year in line with HOS guidelines.</p> | <p>investigations (where carried out) would also be included.</p> <p>There has only ever been one referral to the HOS which was referred to the ICO as it fell outside of the HOS’ jurisdiction.</p> |
| <p>9.8</p> | <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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | | | |