

Appendix A: Self-assessment form

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
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	Customer Complaints Policy – 2.7 and is published on our website.	We have adopted this definition of a complaint in our Customer Complaints 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. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	This is outlined in our Customer Complaints Policy – 2.8 and 2.11. We can evidence through an audit of complaints received that complaints are accepted where the word ‘complaint’ is not used. We can evidence through an audit of complaints received via a third party that these complaints are handled in line with our policy.	Our Customer Complaints Policy outlines that a customer does not have to use the word ‘complaint’ for it to be treated as such and we offer a choice how they would like their dissatisfaction managed. Our Customer Complaints Policy also outlines that a complaint can also be submitted by third parties and/or representatives.
1.4	Landlords must recognise the difference between a service request		This is outlined in our Customer Complaints Policy – 2.5 and 2.6.	Our Customer Complaints Policy defines the difference

	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	<p>We record and review the service requests and monitor through our quarterly reporting in our Customer in the Room report.</p> <p>This is also included in our complaints training, which is mandatory for all staff.</p>	between an Escalated Service Request and complaint. The early resolution process for smaller issues that can be quickly sorted out.
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	We can evidence through an audit of complaints received where we have continued to address the service request following escalation to a complaint.	We outline that any colleague receiving an Escalated Service Request gives the option for the customer to escalate dissatisfaction at any time during the service request to a complaint. The service request will not be paused as part of the complaints process.
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	We can evidence through transcripts of feedback surveys.	We have amended our core feedback surveys to provide details of how customers can 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	These are outlined in our Customer Complaints Policy section 2.10.	Our acceptable exclusions are detailed in our Customer Complaints Policy and are limited to a small number of circumstances.
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. 	Yes	Matters that would not be considered as a complaint are outlined in section 2.10 of our Customer Complaints Policy and are in line with guidance from the Housing Ombudsman Service.	There are certain matters that we would not consider as a complaint. These are documented in our Customer Complaints Policy.

	<ul style="list-style-type: none"> • 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 discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	This is detailed in our Customer Complaints Policy and outlined in section 2.10 of the policy.	Our Customer Complaints Policy defines the length of time we will accept a complaint and is compliant with the Complaint Handling Code.
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	This is detailed in our Customer Complaints Policy and outlined in section 2.10 of the policy.	We provide detailed explanations to our customers when a complaint is not accepted and outline the reasons for our decision. We also provide the customer with the Housing Ombudsman's contact details, so if dissatisfied, they can challenge our decision.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is detailed in our Customer Complaints Policy and outlined in section 2.10 of the policy.	We will seek to investigate and resolve complaints in the best way we can.

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>Within our Customer Complaints Policy we detail different ways customers can make a complaint and the policy is published on the website – 2.3.</p> <p>We can evidence through an audit of complaints that we will accept complaints made in a variety of ways.</p> <p>An Equality Impact Assessment can be evidenced as part of our review to our Customer Complaints Policy in line with the Equality Act 2010 – 1.6.</p>	<p>Complaints can be made in the following ways;</p> <ul style="list-style-type: none"> • In person • Via telephone • In writing • Digitally <p>An Equality Impact Assessment was carried out when our Customer Complaints Policy was reviewed. This will be reviewed annually and when any changes are made to the policy. We routinely ask customers to notify us if they require any adjustments to support them through the complaints process and adjustments are made when identified or requested by customers.</p> <p>Any complaints relating to non-compliance with the principals of the Equality Act</p>

				are referred to our Head of Inclusion and Organisational Culture for an independent and expert review.
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	E – learning Complaints module - This can be evidenced on our internal colleague learning hub from April 2024.	Mandatory E-Learning module has been developed for all colleagues which details the complaints process and key responsibilities.
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	Quarterly reports are published to our Governing Body.	Routine reporting shows an increase in volumes of complaints received.
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	Customer Complaints Policy is published on our website. www.whg.uk.com/feedback-and-complaints/	Our Customer Complaints Policy is published on our website alongside a dedicated complaints page, that details the number of the 2 stages process and the timescales for responding. We have accessibility tools on our webpage to enable customers to translate,

				<p>increase font size or have the complaints information spoken out loud.</p> <p>The Customer Complaints Policy is published in our Round Your Way customer magazine. We also have complaints leaflets available to customers in the reception of our main office and our Community Housing Officers carry leaflets to hand out to customers during their duties.</p>
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	This can be evidenced in our Customer Complaints Policy – 1.10.	Within our Customer Complaints Policy, we include information and the Housing Ombudsman Service and the Complaint Handling 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.	Yes	Customer Complaints Policy – 2.11.	Our policy make provision for complaints to be made by third parties. Where a customer asks a third party to act on their behalf, we will ask for appropriate permissions from the customer before we will do this.

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	<p>This can be evidenced on our website and complaints leaflets.</p> <p>We can evidence through an audit of complaint responses, contact details for the Housing Ombudsman and an explanation of customer's right to access.</p>	<p>Information regarding the Housing Ombudsman Service is included on our Feedback and Complaints Webpage and on our complaints leaflets.</p> <p>In addition to this, all standard complaints correspondence (acknowledgments and responses) includes contact details for the Housing Ombudsman.</p>
-----	--	-----	--	--

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	Quarterly reports are submitted to our Governing Body. Customer Experience team structure and job descriptions.	We have a dedicated Customer Experience Team who take responsibility for complaint handling and liaison with the Ombudsman. Complaints are reported to our governing body (Board and Customer Services Oversight Committee) on a quarterly basis as part of our Customer in The Room report. We have a member of our Board who is responsible for scrutinising the complaints process and also sits on the Customer Services Oversight Committee.
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	Customer Experience team job descriptions. We can evidence through an audit of complaint communications that the Customer Experience team have access to all levels of staff and	Our Customer Experience Team have the autonomy to resolve disputes and have access to all senior stakeholders as well as frontline staff to ensure they can resolve complaints quickly and fairly.

			autonomy to act to resolve disputes promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Training is recorded on the individual team members learning record. Records show the increase in resource for the Customer Experience Team.	The Customer Experience Team have the responsibility of handling all complaints received. They have all received extensive training on how to resolve complaints effectively. They have received training through the Housing Ombudsman Centre of Learning and we are members of Complaints Lab, HQN and Vantage Customer First. They are a part of our Insight and Improvement Team and seen as a core service across the business. The size of the team increased in 2022 and 2024 in response to an increase in demand.

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	Yes	Our Customer Complaints Policy is published on our website.	We have a single Customer Complaints Policy in place

	not be treated differently if they complain.			dealing with complaints which applies to all.
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	This is outlined in our Customer Complaints Policy – 2.5, 2.12.	Early resolution is offered outside our complaints process and gives customers the opportunity for concerns to be dealt with swiftly and promptly. We operate a two-stage process in handling of our complaints.
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	This is outlined in our Customer Complaints Policy – 2.12.	We operate a two stage complaints process.
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	N/A	This is not applicable for whg, all complaints are handled by whg's Customer Experience team.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A	This is not applicable for whg, all complaints are handled by whg's Customer Experience team.

5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	This can be evidenced through an audit of our complaint acknowledgements and is checked as part of routine quality checks.	In all acknowledgements for complaints at Stage 1 or 2, we set out our understanding of the complaint and the resolution the customer is seeking.
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	This is outlined in our Complaints Procedure and can also be evidenced through an audit of complaints.	The Customer Experience Team have received training and are able to clarify all aspects of the complaint we are responsible for.
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 d. consider all relevant information and evidence carefully. 	Yes	This is outlined in our Complaints Procedure and can also be evidenced through an audit of complaints.	Training and supporting documentation (procedure) is focussed on ensuring complaints are handled under these principles.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with	Yes	This can be evidenced through an audit of our complaint extension responses and routine	Customers are issued with a formal acknowledgement at each stage of their

	the resident suitable intervals for keeping them informed about their complaint.		quality checks. An audit review in 2024 found no exceptions.	complaint outlining when they can expect to receive a response. If for any reason we are unable to meet these timescales customers are issued with a formal notification of extension which will include the new date for response.
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 can evidence how we have adapted our approach and made reasonable adjustments where requested.	At the start of our investigation, we will agree any adjustments required with the customer. If the customer makes any disclosures during the complaints process, we will update our systems accordingly.
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	This is outlined in our Customer Complaints Policy – 2.18.	We do not refuse to escalate complaints through all stages of our complaints process unless an exclusion applies.
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	An audit of our systems will evidence our records. An internal audit review in 2024 found no exceptions.	MIS case processing (HPM) records details of each step within each stage of the complaints process. Copies of correspondence to and from the customer are

	any relevant supporting documentation such as reports or surveys.			saved on our shared drive in a case folder clearly marked with the customers complaint reference number and address.
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	This is outlined in our Customer Complaints Policy - 2.19 to 2.22, and Complaints procedure.	The Customer Experience Team work alongside service areas, and follow the complaints procedure, to ensure a complaint can be remedied at any point during the complaints process. We will always aim to offer appropriate remedy at stage 1 to prevent escalations.
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	This is outlined in our Customer Complaints Policy – 2.27 and our Acceptable Behaviour Policy.	We have an Acceptable Behaviour Policy in place to manage unacceptable behaviour from our customers and any restrictions we will put 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	This is outlined in our Acceptable Behaviour Policy.	We will manage any unacceptable behaviour in line with our Acceptable Behaviour Policy. This was reviewed in December 2023 and an Equality Impact Assessment completed.

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	This is outlined in our Customer Complaints Procedure – Section 1.	The Customer Experience Team will triage all new requests to ensure they meet the criteria set out in our Customer Complaints Policy.
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	This is outlined in our Customer Complaints Policy – 2.23 and Complaint Procedure. This is evidenced in an audit review in 2024 with no exceptions being found. We can also evidence through routine quality checks.	Each complaint is logged and monitored on our systems and the Customer Experience Team are responsible for issuing a formal acknowledgement to the customer within 5 working days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.		This is outlined in our Customer Complaints Policy – 2.23 and Complaint Procedure. This is evidenced in an audit review in 2024 with no	A member of the Customer Experience Team will continue to monitor and review the case to throughout the process to provide responses within

			exceptions being found, allowing for agreed extensions. We can also evidence through routine quality checks.	the correct timescales. Complaints deadlines are monitored daily to ensure 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 reason(s) must be clearly explained to the resident.	Yes	This is outlined in our Customer Complaints Policy – 2.24.	We aim to identify the need for an extension as early in the process as possible. If an extension is required, customers receive a formal notification including an explanation, and details of when they can expect to receive a response. We only exceed a 10-day extension in exceptional circumstances, and this is agreed with the customer.
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	This is evidenced in an audit review in 2024 with no exceptions being found, allowing for agreed extensions. We can also evidence through routine quality checks.	Within the extension letter we provide the customer with the Housing Ombudsman contact details. This is included on all complaint letter templates.
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	This is outlined in our Customer Complaints Policy – section 2.19. We have processes in place to monitor and track completion of actions and can evidence this.	Any actions or repairs required as part of the resolution to the customer's complaint are raised during the early stages of the investigation in order to reduce any further delays in completion. If there are any

				outstanding actions, these are tracked and updated regularly.
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	Review of a sample of complaints responses and quality checks.	We provide comprehensive responses to complaints and utilise templates provided by the Housing Ombudsman Service to capture the information in a structured format. We reference relevant policy, law and good practice where appropriate.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This can be evidenced through a sample review of our complaint records and responses.	The Customer Experience Team keep in contact with the customer during the complaint process and will incorporate any additional complaints if raised by the customer if they meet the criteria outline in the Code. Otherwise, a new complaint will be raised.
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; 	Yes	An audit and quality checks of the complaint responses.	Our stage 1 complaint responses adhere to this guidance with all complainants receiving a letter or email including details of the investigation findings, proposed resolution and information

	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.			regarding how to escalate their complaint if they remain dissatisfied. Our letter templates are based on guidance provided by the HOS.
--	--	--	--	--

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	This is outlined in our Customer Complaints Policy – section 2.18.	The customer is able to escalate to stage 2 if they remain dissatisfied. This request must be made within 28 days; however, we will consider escalation requests outside of this timeframe. .
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	This is outlined in our Customer Complaints Policy – 2.23 and Complaint Procedure. This can be evidenced via an audit of our complaint acknowledgements and routine quality checks.	Each escalation request is logged and monitored on our systems with the Customer Experience Team responsible for issuing a formal acknowledgement to the customer within 5 working days of the request being received.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes	This is outlined in our Customer Complaints policy – section 2.18.	We will ask the customer to outline what they feel is outstanding, provide us with

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			any additional evidence we have not previously considered and tell us how they think we could put the situation right. However, refusal to provide this information will not prevent a complaint from being escalated and all escalations are accepted.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is outlined in our Customer Complaints Policy – section 2.12 and within our Complaints Procedure.	Stage 2 complaints will be referred to a manager more senior than the investigating manager for review, with support from the Customer Experience Team.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<p>This is outlined in our Customer Complaints Policy – 2.23 and Complaint Procedure.</p> <p>This can be evidenced via an audit of our complaint responses and routine quality checks.</p>	A member of the Customer Experience Team will continue to manage the case throughout the process to ensure the Senior Manager/Director provides responses in the correct timescales. Deadlines are monitored daily to ensure compliance.
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.	Yes	This is outlined in our Customer Complaints Policy – 2.24.	We aim to identify the need for an extension as early in the process as possible. If an extension is required, customers receive a formal

	Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			notification including an explanation, and details of when they can expect to receive a response. We only exceed a 20-working day extension in exceptional circumstances, and this is agreed with the customer.
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	This is evidenced in an audit review in 2024 with no exceptions being found, allowing for agreed extensions. We can also evidence through routine quality checks.	Within the extension letter we provide the customer with the Housing Ombudsman contact details. This is included on all complaint letter templates.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This is outlined in our Customer Complaints Policy – section 2.19. We have processes in place to monitor and track completion of actions and can evidence this.	Any actions or repairs required as part of the resolution to the customers escalation request are raised during the early stages of the review in order to reduce any further delays in completion. If there are any outstanding actions, these are tracked and updated regularly.
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	Review of a sample of complaints responses and quality checks.	We provide comprehensive responses to complaints and utilise templates provided by the Housing Ombudsman Service to capture the information in a

				structured format. We reference relevant policy, law and good practice where appropriate.
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	An audit and quality checks of the complaint responses.	Our stage 2 complaint responses adhere to this guidance with all complainants receiving a letter including details of the findings, proposed resolution and information regarding how to escalate their matter to the Housing Ombudsman if they remain dissatisfied. Our letter templates are based on guidance provided by the Housing Ombudsman.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is outlined in our Complaints procedure.	The Senior Manager/Director will be responsible for liaising with all relevant colleagues, satisfying themselves that their response covers all points raised. The final response is reviewed by a Corporate Director before being sent to the customer.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	This is outlined in our Customer Complaints Policy – sections 2.19, 2.20, 2.21.	Within our complaint responses we acknowledge where something has gone wrong and what actions we have taken or intend to take to put things right.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>This is outlined in our Customer Complaints Policy – section 2.20.</p> <p>Compensation Matrix.</p>	We have a Compensation Matrix to support colleagues in calculating a fair and reasonable offer of financial redress, reflective of the extent of any service failure. Our Customer Experience Team are experienced in managing expectations.

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	Review a sample check of our complaint responses.	Our complaint responses clearly set out any remedy offer and will be detailed within the letter.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	This is outlined in our Customer Complaints Policy – section 2.20. Compensation Matrix.	When considering remedies, this will be considered in line with our internal guidelines and the Housing Ombudsman's Remedies Guidance. Our compensation matrix was developed based on guidance from the Housing Ombudsman.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>This is outlined in our Customer Complaints Policy – section 3.5.</p> <p>This is published on our website.</p>	<p>We have produced an annual report providing an analysis of our complaint handling, improvement activity, self-assessment and annual report from the Housing Ombudsman.</p>

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	This is published on our website.	The annual complaints performance and service improvement report has been provided to the governing body - (Board and Customer Services Oversight Committee). This has been reviewed and their response has been published.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is outlined in our Customer Complaints Policy – section 3.5.	We will also carry out a self-assessment following a significant restructure, merger and / or change in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If requested, evidence of the review of the Self-Assessment to be provided.	If requested by the Housing Ombudsman, we will review and update the self-assessment.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Evidence of completion to be provided in the event of occurrence.	If whg is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Housing Ombudsman and affected customers, and publish this on the whg website, including 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	Lessons learnt process and reports. Annual Complaints Performance and Improvement report.	Our lessons learnt process seeks to identify areas for improvement across the wider business. Improvement actions are monitored by the Governance Team until completion.
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	This is evidenced in our Customer in the Room reports, Customer Oversight Committee reports and Annual Complaints Performance and Improvement report.	Lessons learnt are reported to our governing body (Board and Customer Services Oversight Committee) on a quarterly basis as part of our Customer in The Room and complaints reports. Our Annual Complaints Performance and Improvement report outlines actions we have taken based on feedback and learning from complaints.
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	This can be evidenced in the Customer in the Room report.	The Customer in The Room report is shared with our Board, Customer Services Oversight Committee and engaged customers. This report details complaints

				theme and detailed lessons learned reviews.
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	Customer Service Oversight Committee and Board reports.	The Corporate Director of Strategy, Assets and Transformation is accountable for assessing themes and trends, oversees the complaints process and reports to the governing body.
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	This is evidenced within our Customer Complaints Policy – section 3.4.	The Chair of our Customer Service Oversight Committee has been appointed and is referred to the 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	This is evidenced within our Customer Complaints Policy – section 3.4.	This role is responsible for ensuring our governing body receives regular information on complaints that provides insight on our complaint handling performance.
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	Customer in the Room report Quarterly complaints report to CSOC and Board Annual Complaints Performance and Improvement report.	The Customer in the Room and complaints performance reports are produced quarterly and shared with the Member Responsible for Complaints,

	<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>the Customer Service Oversight Committee and Board. These reports include information re. volumes of complaints, trends and the outcomes of lessons learned reviews. All findings from the HOS are shared.</p>
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> <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>	Yes	As audit of performance management plans.	<p>whg introduced a performance management framework in 2023. All colleagues whose role involves management of complaints have a standard objective to ensure we manage complaints in compliance with the Complaints Handling Code.</p>

Appendices

1. [Customer Complaints Policy](#)
2. [Acceptable Behaviour Policy](#)