



Housing Ombudsman Code – 2026 Self Assessment

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	HHA Complaints Policy (HHACP)	Definition as detailed in Section 2 of Halo Housing Associations (HHA) Complaints Policy. All appointed complaint officers are familiar with this.
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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	HHA Complaints Policy, Staff Training	This information is outlined in Section 2 of The Complaints Policy. Staff at HHA are trained to recognise when a Tenant/ representative may be initiating a complaint and how to handle a complaint.
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	Yes	HHA Complaints Policy, HHA Management System Logs	The Complaints Policy, Section 2.3 details this information. HHA’s Housing Management system also

	to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			documents all calls and requests for repairs, and they are categorised accordingly.
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	HHA Complaints Policy	The Complaints Policy Section 2.2 details how, HHA will make all efforts to resolve a complaint or expression of dissatisfaction promptly whilst continuing to address the service request.
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	Tenant Satisfaction Surveys (TSM), staff training. HHA Complaints Policy	Tenant Satisfaction Surveys details how tenants can pursue any dissatisfaction as 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	HHA Complaints Policy	The Complaints Policy Sections 7.1 and 7.2 details we will provide reasoning if a complaint is not accepted. Section 2.3 details what is not a complaint.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	Yes	HHA Complaints Policy	This information is outlined in Section 2.3 of The Complaints Policy.

	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	HHA Complaints Policy	The Complaints Policy, Section 2.3 includes specific details of the time limit for accepting complaints and exemptions. HHA will respond and accept complaints within 12 months of the concern arising. The Operations Director will apply discretion to any complaint falling outside of this timescale.
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	HHA Complaints Policy	The Complaints Policy, Section 7.2 details how we will provide reasoning if we make the decision to not accept the complaint.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	HHA Complaints Policy	The Complaints Policy Section 1.1 states that HHA will always treat each complaint fairly on its own merit.

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	HHA Complaints Policy	The Equality Act 2010 is integrated throughout HHA's Complaints Policy. Information on how to make a complaint is also available in alternative formats, in accordance with the Accessible Information Standard.
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	QPRs and Staff Training	Supported Living Officers (SLO's) continuously build positive, trusting relationships with Tenants. This encourages open communication, ensuring Tenants are comfortable when raising complaints and concerns. All staff are trained and familiar with the complaints policy and framework and provide a

				collaborative approach across our services.
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	Board Meeting Minutes	HHA ensures transparency in the handling of complaints. Complaints are reported to the Board and are regularly reviewed to identify new or recurring themes and opportunities for improvement. Any learning points are communicated to the Team via our Internal Newsletter – Halo Highlights.
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	HHA Complaints Policy, HHA website	The Complaints Policy Section 3 and HHA website clearly details the two-stage process. HHA ensures compliance with the Accessibility Information Standard by providing an easy read version of the policy.
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	HHA Complaints Policy	The Complaints Policy, Section 7 details The Housing Ombudsman contact details. Information about the Complaint Handling Code can

				be found in Section 2 of The Complaints Policy.
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	HHA Complaints Policy	HHA will make reasonable adjustments to support Tenants through the complaint's procedure. The Tenant's right to a representative is detailed in Section 3 of The Complaints Policy.
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	HHA Complaints Policy	The Complaints Policy Section 7 details the Housing Ombudsman contact details. HHA inform Tenants of the right to access the Housing Ombudsman service at all stages of the complaints process.

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	HHA Complaints Officer/ Complaints Officer	HHA has three designated Complaints Officers, which are the Governance Officer and the Project Officer (Stage 1) Operations Director (Stage 2). All complaints are referred to the appropriate complaints officer. This is highlighted in Section 3.2 and 4.2 of The Complaints Policy.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints Officer	Complaint officers have been appointed based on their structural position within the company and their ability to conduct timely investigations and ability to remain impartial. Any potential conflicts of interest will be identified before acknowledging and responding to a complaint, ensuring the most appropriate officer handles the matter 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	Complaints Officer	HHA's Complaints Officers are trained with appropriate knowledge of the Complaint Handling Code. There is a positive culture around the handling of and learning from complaints. All complaints are reported to the Board to highlight lessons learnt and to adopt the best practices.
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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	HHA Complaints Policy	HHA has one Complaints Policy which outlines how complaints must be managed. This ensures the Complaints Officers are consistent throughout the handling of complaints.
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	Yes	HHA Complaints Policy, HHA Website	The Complaints Policy, outlines that there are two stages to the complaint

	stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			process. This information is also publicly documented on our website.
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	HHA Complaints Policy, HHA Website	The Complaints Policy details the two-stage complaint process. This information is also publicly documented on our website. HHA adheres to the Complaint Handling Code .
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	HHA Complaints Policy	The Complaints Policy, Section 2 explains how complaints are managed internally. If a third party is contracted to handle a complaint, the stage-two process will remain the same.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	HHA Complaints Policy	Where it is considered necessary for an independent adjudicator to manage a complaint, HHA will ensure that the adjudicator operates in accordance with the Complaints Handling Code and addresses the complaint appropriately.

				This is outlined in Section 2.2 of The Complaints Policy.
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	HHA Complaints Policy	HHA Complaint Officers will respond to a Tenant / representative within 5 working days to acknowledge their views, clarify details and to agree to a timescale. HHA will check whether any support is required and explain the procedure. This is detailed in Section 3 of The Complaints Policy.
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	HHA Complaints Policy	HHA Complaints Officers will acknowledge receipt of a complaint within five working days and will seek clarification if any aspects are unclear. If any part of the complaint falls outside HHA’s responsibility, this will be clearly stated in our response.
5.8	At each stage of the complaints process, complaint handlers must:	Yes	HHA Complaints Policy, Complaints Officers	The designated Complaints Officers (Project Officer,

	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.			Governance Officer and Operations Director) hold positions which enable them to remain neutral when managing a complaint. This minimises the risk of conflict of interest.
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	HHA Complaints Policy	HHA keep Tenants fully informed of any delays when processing a complaint. Should it not be possible to respond in the necessary timetable. A suitable alternative timescale will be agreed upon with the Tenant/their representatives for providing a response. This is detailed in Section 3.3 of The Complaints 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	Yes	HHA Complaints Policy	To support Tenants through the complaint process, HHA will make reasonable adjustments in line with the

	well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			Equality Act 2010. This includes meeting the Accessible Information Standard by ensuring Tenants receive information in accessible formats (e.g. easy read/ large format etc.) where required. This is detailed in Section 2 of The Complaints Policy.
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	HHA Complaints Policy	The Complaints Policy, Section 7.2 demonstrates HHA's understanding of refusing a complaint and HHA's need to provide a valid reason.
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	Internal server/ Complaints Officer	The designated Complaints Officers at HHA will maintain all records, key facts and dates relating to the complaint. All data will be managed in accordance with GDPR.
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	Yes	Complaints Officer	HHA has designated Complaints Officers in place

	appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			which allows for flexible resolutions of complaints.
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	HHA Complaints Policy, Anti-Social Behaviour Policy.	HHA's Complaints Policy includes provisions for managing unreasonable, persistent, or unacceptable behaviour. Any restrictions on contact are applied only in exceptional circumstances, supported by clear evidence, recorded with reasons, communicated to the resident, and reviewed regularly to ensure they remain appropriate and proportionate.
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	HHA Complaints Policy, Anti-Social Behaviour Policy.	Any restrictions deemed necessary to reduce or remove unacceptable behaviour will be imposed in adherence to the Equality Act 2010 and will be reviewed regularly.

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	Complaints Officer	The Complaints Officer will assess each complaint to uncover whether the Tenant is at immediate risk. The Officer will also take into account if any part(s) of the complaint can be resolved immediately.
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	HHA Complaints Policy	HHA ensures all complaints are acknowledged within 5 working days at Stage 1. This is detailed in Section 3.2 of The Complaints Policy.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	HHA Complaints Policy	The Complaints Policy, Section 3.3 details when complaints are expected to be resolved (10 working days).

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	HHA Complaints Policy	The Complaints Policy, Section 3.3 details how if there is a delay in responding to a complaint, the Tenant will be notified, and a longer timescale will be agreed with them.
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	HHA Complaints Policy	The Complaints Policy, Section 7.3 states the Housing Ombudsman's contact details will be provided at every stage of the complaints process.
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	HHA Complaints Policy	HHA Complaints Officers will ensure there is no delay in communicating a known response to Tenants or where an investigation has concluded.
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	HHA Complaints Policy	The Complaints Policy, Section 3.5 details that all complaints will receive a full and thorough response.

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	HHA Complaints Policy	The Complaints Policy, Section 3.4 states that additional complaints raised in connection with the original complaint will be included as part of the Stage 1 response. However, if the additional complaint is not related to the original complaint, it will be managed and treated 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. 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	HHA Complaints Policy, HHA Complaints Letter Template	The Complaints Policy, Section 3.5 details all the information that will be included in a Stage 1 response. HHA also has complaint letter templates which are used for responding to each stage of a complaint. These templates ensure we address all areas.

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	HHA Complaints Policy	The Complaints Policy, Section 4 details the progression of a complaint to stage 2. It also states the rationale behind this i.e. Tenant dissatisfaction with the response received in Stage 1.
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	HHA Complaints Policy	The Complaints Policy, Section 4.2 details how HHA will acknowledge the request for the complaint to be escalated within 5 working days of receiving the request.
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	HHA Complaints Policy	The Complaints Policy, Section 4.1 outlines how HHA will operate when a Tenant wishes to escalate a complaint to Stage 2. HHA will make efforts to understand which issues remain outstanding.
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 Officers	HHA has two designated Complaints Officers. This enables a different person to deal with each stage of the complaint, if required. Where necessary the Managing Director will respond to complaints at 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	HHA Complaints Policy	The Complaints Policy, Section 4.2 details that HHA at Stage 2 will issue a full response within 20 working days of acknowledgement of the complaint being received.
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	HHA Complaints Policy	Section 4.2 of the policy explains how the Tenant/ claimant will be informed of any expected delay and agreed response timescale will be no longer than 20 working days.
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	HHA Complaints Policy	HHA will provide the Housing Ombudsman's contact details at every stage of the complaint.
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	Complaints Officer, HHA Complaints Policy	The assigned Complaints Officer will respond to a complaint without delay where relevant information is available. The Complaints Officer will also follow up on the required action during and after handling the complaints. This will be detailed in all complaint responses where applicable. Section 4.3 of the policy outlines this information.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	HHA Complaints Letter Template	HHA has complaint letter templates which are used to respond to each stage of a complaint. This ensures

	policy, law and good practice where appropriate.			that all the requirements of the code are met.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; 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	HHA Complaints Letter Template, HHA Complaints Policy	The Complaints Policy, Section 4.3, highlights the information that will be provided at stage 2. HHA has complaint letter templates which are used for responding to each stage of a complaint.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	HHA Complaints Letter Template, Complaints Officer	HHA's stage-2 letter template concludes the final stage of the complaint procedure. The Complaints Officer handling the process will ensure a thorough investigation is conducted, including liaising with the relevant staff where applicable.

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: • 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	HHA Complaints Policy, Complaints Letter Template	The Complaints Policy, Section 4.3 highlights the information that will be provided at stage 2. HHA have complaint letter templates which are used for responding to each stage of a complaint and has been created on a stance of being open, fair and transparent in its handling of complaints. This includes admitting to any shortfalls and apologising. HHA has a strong approach to learning from complaints to improve service delivery for Tenants. These will be reported to the Board. Section 1, 4.5 and 8 of the policy cover this.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	HHA Complaints Policy	HHA aims to remain fair and accountable when reaching a resolution of a complaint. This information is in section 1 (introduction) of The Complaints Policy.
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes	HHA Complaints Policy, Complaints Letter Template	The Complaints Policy states that a full and

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			thorough response will be provided to a tenant when responding to a complaint. This includes highlighting follow-up actions.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaint Handling Code	HHA ensure they are operating within the requirements of the Complaint Handling Code when coming to a resolution of a complaint.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;	Yes	HHA Complaints Policy	HHA report to the board quarterly and provide an overview of complaints including the content and quantity. The Housing Ombudsman Complaints Self-Assessment is completed annually by HHA and published on the website.

	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.			
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	Website	HHA's Annual Report includes the annual complaints performance and service improvement report. The Annual Report is published on our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaints Self-Assessment	HHA will review its self-assessment following any major organisational changes.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Complaints Self-Assessment	HHA will comply with any requests from The Housing Ombudsman within agreed timescales.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber	Yes	HHA Operations	HHA will inform The Housing Ombudsman if there are any extenuating

	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.			circumstances that make them unable to comply with the Complaints Code.
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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	HHA Complaints Policy	The Complaints Policy, Section 8 highlights the aim of learning from complaints through analysis and measuring satisfaction.
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	Complaints Officers	The designated Complaints Officers take a positive, proactive approach to managing and resolving complaints. Their role also allows them to share insights and learning with the wider team.
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	Complaint Officers, Board Meetings	HHA has an open approach to complaints handling and openly share the content and learning outcomes with all relevant parties. This includes reporting to the Board on a quarterly basis.
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	Complaints Officers	HHA Complaints Officers are appointed as Governance Officer and Project Officer (Stage 1) Operations Director (Stage 2). This places the Officers

				in a position to effectively analyse complaints.
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	Member of the Board	HHA have a designated member of the Board as the MRC for the organisation.
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	Member of the Board/ Board Meetings	The MRC is an appointed member of the board and has substantial oversight of the operations within HHA to enable them to make suitable reports to the governing body.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 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	Yes	Board Meetings	The MRC attends quarterly board meetings and is regularly informed of the status and content of complaints. The MRC is also informed of the outcome of tenant surveys and TSMs. They also have oversight of the Complaints Self-Assessment.

	orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	HHA Complaints Policy/ Staff Training	The Complaints Policy aims to streamline the complaints process. By not overcomplicating the process HHA aims to make the process accessible for all parties to comprehend. HHA provide training to all employees to ensure they are aware of the Complaints Policy and its scope.