Housing Ombudsman Complaints Handling Self-Assessment Form – YMCA St Paul's Group April 2025

Guidance note from the Housing Ombudsman Service:

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.

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	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
1.2	A complaint must be defined as:		Included in the published policy.
	'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.	Yes	NOTE: We refer to 'customer' and define residents as one group that the policy applies to.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	We consider anything brought to our attention that fitted the complaints definition, even if the term 'complaint' is not used. The policy covers this.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes Yes	The policy covers this. The nature of our work means that we do get a large volume of what we believe to be service requests. Where a service request has come through via our complaints handling process, it is being tracked on the same system as complaints.
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	The policy covers this.
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	This is now included in the telephone surveys.

Section 2 – Exclusions

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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	Reasons for not accepting a complaint are detailed in the policy.
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 policy sets out exclusions which we feel are reasonable.
	 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	
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	The revised policy now covers complaints up to 12 months from the issue occurring.
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	Covered in the policy. We have not had a situation yet where a complaint has been rejected but brought to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	We consider all complaints on their own merits.

Section 3 - Accessibility and Awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Residents can complain in person, via email, via the website or over the phone. We have easy read versions for the Supported Living Scheme and a simple guide on our website and available at sites. The majority of the Charity's work is with young and vulnerable people living in our supported accommodation and we hold detailed information around all their support

			needs, including communication needs. Due to the way we take referrals into all our accommodation, we do also have an understanding of the needs of our general needs residents.
3.2	Residents must be able to raise their complaints in any way and with any		Covered in the policy which is communicated with all staff.
	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	Weekly meetings with Customer Services team leaders also in place now.
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	We have a good number of complaints coming through and are now monitoring them on a site-by-site basis.
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	Policy and short easy guide version are published on our website and an easy read version is available for the Supported Living scheme.
			Simple posters with a QR code are also being rolled out during Q1 of 25/26.
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	Covered in the 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	Covered in the 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	Ombudsman information included in policy and the right to contact the Ombudsman also set out.
			Ombudsman details are also included in our response letters/ correspondence.

Section 4 - Complaint Handling Staff

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We do have a designated Complaints Officer, an Executive Lead for Safeguarding and a Member Responsible for Complaints (MRC).

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.		The Complaints Officer directly reports to the Executive Lead for Complaints, the Director of Operations and has access to all levels of staff to facilitate prompt resolution.
		Yes	The Complaints Handler usually is the relevant service manager (if appropriate and no conflict of interest arises from them handling the complaint). All service managers have regular complaints handling training and are offered weekly drop-in sessions with the Complaints Officer.
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	All service managers have regular complaints handling training and are offered weekly drop-in sessions with the Complaints Officer.

Section 5 – The Complaint Handling Process

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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	We have one overarching complaints policy covering all our services. Residents who complain are not treated differently.
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	Our policy only involves two stages as per the code.
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	Policy reflects this.
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	Currently not applicable but noted.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	Currently not applicable but noted.
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	Our response letters have been updated to reflect this.
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 covered when we write to the complainant.

5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	This is covered in the training session and during the weekly complaints drop-in sessions. To further strengthen this, we are looking to update the staff code of conduct in the coming year to include our expectations around staff's conduct when it comes to handling complaints.
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	This is noted and the Complaints Officer is responsible for overseeing this.
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	As above. Our policy does cover this and we do in practice make adjustments as necessary.
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	See notes against 2.2 above. We have, to date, not refused to escalate a complaint.
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	Records of the complaint and any resultant correspondence are kept on Inform
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints Handlers have the appropriate levels of authority or access to those with the appropriate level of authority to remedy the complaints at the stage they are assigned to it. We also have a compensation policy which sets out that remedies can be provided at any stage.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	We have an anti-social behaviour policy and the complaints policy covers what we would do if a complainant's behaviour is unacceptable.
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	Covered both in the Complaints policy and Anti-Social Behaviour policy.

Section 6 - Complaint Stages

Stage 1

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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 reviews and provides appropriate guidance.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Our policy sets out the same time frame.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Our policy sets out the same time frame.
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	Our policy sets out the same time frame.
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	Ombudsman details are included on the extension letter.
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	We have outcome letters that are provided and managers have been reminded that they need to write to the complainant as soon as the answer to the complaint is known, not when the outstanding action is completed. The Complaints Officer now sends out all correspondence. Actions can be tracked on Inform but due to the nature of our housing, updates are usually provided verbally to the resident, so some work to be done to ensure those actions are tracked all the way through on the system.
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	The Complaints Officer supports complaint handlers with this as required and now sends all correspondence, meaning all letters are checked before sent.
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	Covered in the training we provide to complaint handlers.

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	Yes	A template outcome letter has been set up, ensuring that complaints handlers include these points and the Complaints Officer now sends all correspondence, meaning all letters are checked before sent.

Stage 2

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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	Set out in policy.
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	Our policy sets out the same time frame.
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	Covered in policy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	We always assign a new manager to the complaint at Stage 2.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Our policy sets out the same time frame.
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	Our policy sets out the same time frame.
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	Ombudsman details are included on the extension letter.

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	As per 6.6. We have outcome letters that are provided and managers have been reminded that they need to write to the complainant as soon as the answer to the complaint is known, not when the outstanding action is completed. Actions can be tracked on Inform but due to the nature of our housing, updates are usually provided verbally to the resident, so some work to be done to ensure those actions are tracked all the way through on the system.
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	The Complaints Officer supports complaint handlers with this as required and now sends all correspondence, meaning all letters are checked before sent.
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	A template outcome letter has been set up, ensuring that complaints handlers include these points and the Complaints Officer now sends all correspondence, meaning all letters are checked before sent.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our policy and practice is in line with the code. Our outcome letters explains to the complainant that this is the final stage and reminds them of their right to contact the Ombudsman if our response does still not fully address/ resolve their complaint.

Section 7 - Putting Things Right

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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;	Yes	The template outcome letters give prompters to what needs to be covered, including the need to acknowledge if something has gone wrong and the action to be taken to put things right. Complaints outcomes are tracked on the system and we review regularly how we have put things right.

	 Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 		To further strengthen this, we have developed a clear compensation policy, underpinned by the requirements of this code.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints handlers consider what impact any fault on our part had on the resident when considering the remedy offered. This can be evidenced through our outcome letters.
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	However, further work is still required to ensure these are tracked through on the system to demonstrate that we have done what we said we would do.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The complaints officer and Executive Lead for Complaints support complaint handlers with this as required.

Section 8 – Self-Assessment, Reporting and Compliance

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:		This annual self-assessment has been carried out against the code.
	 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	Complaints handling performance reports are produced on a monthly basis for scrutiny by the Executive Team and on a quarterly basis for scrutiny by the MRC and Resident Rep Panel. An annual complaints report is presented to the Board for their scrutiny. This report includes any service improvements made as a result of the learning from complaint, any annual reports about our performance from the Ombudsman and any other relevant reports.
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	Current self-assessment is published on the website. The annual report for 24/25 and the board's response will be published on the website once available and by the required deadline (30 June 2025).

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Noted.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted.
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	Noted.

Section 9 – Scrutiny & Oversight: Continuous Learning and Improvement

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
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	This is covered during the complaints handling training and during complaints reviews.
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 handlers and relevant managers continue to be reminded that complaints are a source of intelligence to identify issues and necessary changes to service delivery.
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	Updates go to Resident Representative meetings and MRC as well as Performance Committee and Board as required.
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	This sits with the Group Director of Operations.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The board have appointed an MRC.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC meets with the Director of Operations on a quarterly basis to review performance; complaints handling performance and issues are escalated to the Board following each MRC meeting.

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 orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Quarterly reports to the MRC and then the Performance Committee (with escalation reports to the board as necessary). Annual Self-Assessment and Annual Complaints report goes to MRC, Resident Reps, Performance Committee and then to the Board.
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 cooperative 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	The organisation feels that including this (and section 5.8) in the staff code of conduct, rather than objectives, is a better way of ensuring that this has the prominence it requires. All staff could at one point be involved in complaints resolution (even if not necessarily required to handle complaints). All staff are bound by the Code of Conduct which sets out the approach.