

Housing Ombudsman Complaints Handling Self-Assessment Form

YMCA St Paul's Group - June 2026

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

Overall assurance and improvement statement

This self-assessment has been completed using the Housing Ombudsman Complaint Handling Code self-assessment guidance, the YMCA St Paul's Group Complaints Policy, 2025/26 quarterly and annual complaints performance reports, 25/26 TSM results, resident feedback and the resident focus group action plan developed during 25/26 in response to the 2024/25 TSM complaints satisfaction result.

Overall, our policy is aligned with the Code and we have continued to strengthen governance, reporting, templates, training and oversight during 2025/26. However, this assessment also recognises that policy compliance does not always mean that practice is consistently embedded. The evidence from complaints performance, Ombudsman contact, resident feedback and internal reviews shows that further improvement is required in some areas, particularly in:

- ▶ consistently distinguishing between service requests and complaints;
- ▶ ensuring complaints are logged and acknowledged promptly when first received by any member of staff;
- ▶ tracking promised actions and remedies through to completion;
- ▶ evidencing updates given verbally to residents;
- ▶ improving communication during repairs and service disruption;
- ▶ strengthening staff understanding of trauma-informed, resident-centred complaint handling;
- ▶ and ensuring residents understand how to complain, what will happen next and how learning is used.

The organisation continues to promote a positive complaints handling culture, where feedback and complaints are welcomed as valuable opportunities to learn, improve services and strengthen relationships with residents. Staff are encouraged to respond openly, fairly, and constructively to dissatisfaction, ensuring that complaints are viewed as a tool for service improvement rather than a source of blame. The improvement actions identified in this self-assessment are therefore intended to support continued compliance with the Code and to improve

residents' experience of complaint handling at YMCA St Paul's Group in practice. Appendix 1 provides a table of all improvement actions identified within the assessment.

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The definition of a complaint is included in the published Complaints Policy and mirrors the Housing Ombudsman's definition. The policy applies across YMCA St Paul's Group services, including landlord services, and residents are included within the wider group of customers covered by the policy. Evidence: Complaints Policy (last re-approved in June 2025); published complaints information; annual complaints performance report; complaints tracker. Practice reflection: The policy wording is compliant. However, we recognise that resident-facing language should be as clear and consistent as possible. In resident-facing materials we are moving towards using "residents" where the information relates to landlord services, while recognising that the wider policy also applies to other customers and service users.
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	The Complaints Policy makes clear that a resident does not have to use the word "complaint" for their dissatisfaction to be treated as a complaint. Complaints can also be made by a representative or third party. Evidence: Complaints Policy; complaints templates; complaints officer review of submissions; complaints tracker. Practice reflection: We consider whether expressions of dissatisfaction meet the definition of a complaint even where the word "complaint" is not used. However, practice evidence shows that this remains an area requiring continued focus and we need to continue strengthening staff confidence in recognising complaints where dissatisfaction is expressed, in particular verbally. Improvement action: A standardised staff training module on the difference between complaints and service requests is being developed and will be used during onboarding and thereafter offered annually. This action was also included in the resident focus group action plan following feedback on complaints handling satisfaction.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The Complaints Policy distinguishes between a service request and a complaint. Service requests received through the complaints route are recorded and monitored. Where a submission is redirected to another process (i.e. service request or ASB), the reason is recorded on the complaints tracker. Evidence: Complaints Policy; complaints tracker; quarterly complaints reports; annual complaints performance report. Practice reflection: The policy is compliant, and we do monitor service requests that come through the complaints portal. However, the high number of service requests recorded through the complaints process indicates that more work is needed to make the distinction clearer for residents and more importantly staff. We also recognise that if a resident expresses dissatisfaction with how a service request has been handled, this must be treated as a complaint even where the original issue remains ongoing. In 2025/26, a number of submissions received via the complaints handling system were dealt with via other formal processes. 58 x were re-recorded as service requests, 21 x were treated via the ASB procedure and 2 x were safeguarding concerns. In one case the complainant had exhausted our complaints process, one case was an actual incident report and one was a request for information. Improvement action: Updated resident posters, a resident-facing video and digital materials are being developed to explain the difference between a complaint and a service request and how to complain. This was agreed following the resident focus group held in response to the drop in complaints handling satisfaction TSM.
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	This is covered in our policy. Our policy clearly distinguishes between a service request and a complaint. Evidence: Complaints Policy; complaints tracker. Practice Reflection: Where a resident is dissatisfied with the response to a service request, we will record this as a complaint, even if the service request is still ongoing. We will continue to progress the service request alongside the complaint to ensure the issue is resolved.
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	Yes	Feedback gathered through surveys is not treated as a formal complaint. Our TSM telephone surveys are carried out by an independent agency who will direct the resident to our complaints email should a resident wish to complain. Evidence: Detailed TSM results. Practice Reflection: Our TSM telephone surveys, delivered by an independent agency, ensure residents are signposted to our complaints email if they wish to raise a complaint. We also ensure that information on how to complain is available in our communications and on our website, so

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	provide details of how residents can complain.		residents can easily raise concerns if they choose to do so. This approach ensures residents are aware of their right to complain when providing feedback.

Section 2 – Exclusions

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The Complaints Policy sets out that complaints will be accepted unless there is a valid reason not to do so. Reasons for not accepting complaints are recorded and monitored through the complaints tracker and reported through quarterly and annual complaints performance reports. Evidence: Complaints Policy; complaints tracker; quarterly complaints reports; annual complaints performance report. Practice reflection: We recognise that decisions not to accept complaints must be clearly evidenced and explained to residents, including signposting to the Housing Ombudsman where relevant. The annual complaints tracker demonstrates that reasons for non-acceptance are recorded, but we will continue to strengthen the quality and consistency of written explanations. See also section 2.4 below. Improvement action: Complaints Officer oversight of complaints not accepted will continue, with learning shared through staff training and drop-in sessions.
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. - Matters that have previously been considered under the complaints policy.	Yes	The Complaints Policy sets out the circumstances in which a matter may not be considered under the complaints process or may not be escalated, including where another more appropriate process applies, where the matter has already exhausted the complaints process, where legal proceedings have started or where the matter is outside the relevant time limit. Evidence: Complaints Policy; complaints tracker; quarterly and annual complaints reporting. Practice reflection: The exclusions in the policy are intended to be fair and reasonable. In practice, the most common reasons for re-directing submissions that were made via the complaints handling portal to a different process in 2025/26 were service requests and ASB. This suggests that exclusions are not generally being used to prevent access to the complaints process, but it also highlights the importance of ensuring staff can identify when a matter should still be treated as a complaint because the resident is dissatisfied with our response or lack of action. Improvement action: We will strengthen staff training and resident communications so that exclusions are applied consistently and residents understand the reason for any decision not to accept a complaint.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: Complaints Policy; complaints tracker; quarterly and annual complaints reporting. Practice reflection: we have not had to consider any complaints in relation to issues that were outside of the 12 months' time limit but should any arise in the future, discretion will be applied.
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 Under review by Housing Ombudsman	Our complaints policy sets out the circumstances in which a complaint may not be accepted and confirms that, where this happens, we will explain the reason to the resident and signpost their right to contact the Housing Ombudsman. Evidence: Complaints Policy; complaints tracker; quarterly and annual complaints reporting. Practice reflection: During 2025/26, we received correspondence from a resident which we initially treated as a service request. The Housing Ombudsman asked us to reconsider this and accept the matter as a complaint. We sought further clarification from the Ombudsman, but a Complaint Handling Failure Notice was subsequently issued in relation to our handling of the matter. The case remains under review by the Ombudsman and we will consider any findings or recommendations when the review is concluded.
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, by email, through the website, by telephone, or through a representative. The complaints policy and a short guide are available on the website. Easy-read materials are available for the Supported Living scheme, and staff hold information about residents' support and communication needs where known. Evidence: Complaints Policy; website complaints information; easy-read materials; resident records; annual complaints report; resident focus group action plan. Practice reflection: The policy and available channels are compliant. However, the reduction in TSM satisfaction with complaints handling and resident feedback from the focus group show that accessibility is not just about having channels available. Residents also need to understand how

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			to complain, what will happen after they complain, the difference between a complaint and a service request, and how they will be kept updated. Improvement action: The resident focus group action plan includes updated posters, clearer resident communication materials, a video and digital messages to residents. The video has been completed and is being finalised for publication and will be available in the main languages we know our residents speak. Updated posters were worked on during Q4 in 25/26 and will be issued by August 2026/27.
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	The Complaints Policy is communicated to staff and residents should be able to raise a complaint with any member of staff. Complaints are then passed to the Complaints Officer or relevant manager for logging and handling. Evidence: Complaints Policy; complaints training; complaints drop-in sessions; complaints tracker; quarterly complaints report. Practice reflection: The policy is compliant. However, practice evidence shows that there have been instances where a complaint was not logged promptly by the staff member who received it, which affected response timescales. This demonstrates that staff awareness and practical application still need strengthening. Improvement action: A Customer Services Team Leader workshop is planned for July 2026/27. A standardised training module for all staff is being developed, including how to recognise a complaint, how to distinguish complaints from service requests and how to submit complaints on the system.
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	Complaint volumes are monitored by service and by site. We do not view higher complaint volumes as negative in themselves. Evidence: Complaints tracker; quarterly reports; annual complaints performance report. Practice reflection: In 2025/26, YMCA St Paul's Group received 105 x Stage 1 complaints and 18 x Stage 2 escalations related to landlord services. We monitor complaint volumes by site and recognise that low or no complaints at some sites may indicate either fewer issues or barriers to raising complaints. The resident focus group and planned resident communications are intended to improve awareness and confidence in the complaints process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: easy guide and easy read versions on website. Posters with QR codes on sites. Practice reflection: We do publish all our relevant documents online and do also display posters within each property – this ensures resident who are not digitally connected also have access to this information. Improvement Action: Updated posters and a video (translated into key languages) are being published during 26/27. The complaints page on our website is also undergoing a review and will be launched during Q2 of 26/27.
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 and on our website as well as in resident inductions. Resident representatives are also aware and do share this information when they meet with residents. Evidence: Complaints Policy; website; resident induction pack. Practice Reflection: Our complaints policy explains how residents can access the complaints process, including details of the Housing Ombudsman and the Complaint Handling Code. This information is available on our website, shared during resident induction, Resident Reps informed and asked to share and included in complaint responses. We are also increasing visibility through posters and on-site communications to make it easier for residents to understand how to raise a complaint. This ensures residents are aware of their rights and how to escalate concerns if needed.
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. Evidence: complaints tracker. Practice reflection: We regularly liaise with Cllrs or relatives who are acting on behalf of our residents. We have also liaised with other advocates, such as Shelter and refugee support groups.
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. Evidence: complaints policy, complaints correspondence letters Practice reflection: Ombudsman details are 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 Complaints and a Member Responsible for Complaints (MRC). Evidence: Complaints Officer = Ania Niemiec (maternity cover), Executive Lead for Complaints = Jessica Laryea (Group Director of Operations) and MRC = David Dangana. Practice Reflection: all of the above plus the Chief Executive met on a quarterly basis during 25/26 to review volume of complaints, complaints handling response times, key themes and lessons to be learned/ service improvements resulting from complaints. Escalations from those meetings then were reported to the full Board, Performance Committee and Resident Representative 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	The Complaints Officer directly reports to the Executive Lead for Complaints, the Group Director of Operations, and has access to all levels of staff to facilitate prompt resolution. Evidence: Complaints Officer JD; correspondence between Complaints Officer and Complaints Handlers. Practice Reflection: 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	Complaint handling is treated as a core service function. Relevant managers receive complaints handling training and are offered weekly drop-in sessions with the Complaints Officer. Complaint performance is reviewed monthly by the Executive Team and quarterly by the Member Responsible for Complaints, Resident Representative Committee and Performance Committee. Evidence: Complaints training records; weekly drop-in sessions; quarterly complaints reports; annual complaints performance report; MRC review reports and meeting minutes. Practice reflection: The organisation has strengthened complaint handling oversight and reporting. However, complaints evidence shows that further work is needed to embed a consistently positive complaint handling culture across all services. Key themes from 2025/26 complaints included communication, staff attitude and support, repairs, contractor management and the need for more trauma-informed practice. Additional customer service, PIE, trauma-informed and de-escalation refresher training has been identified and rolled out where needed. Improvement action: The above training is required to be delivered on an ongoing basis. We are also reviewing how expectations around complaint handling and professional conduct are reflected in the staff Code of Conduct.

Section 5 – The Complaint Handling Process

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: complaints policy; complaints tracker;
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. Evidence: complaints policy, complaints tracker (showing we only have two stages).
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. Evidence: complaints policy, complaints tracker (showing we only have two stages).
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	Acknowledgement and response templates have been updated to set out our understanding of the complaint and the outcome the resident is seeking. Where the complaint is unclear, staff are expected to seek clarification. Evidence: Complaint acknowledgement templates; outcome letter templates; Complaints Officer review; complaints training. Practice reflection: The templates are compliant and the Complaints Officer checks all acknowledgement and outcome letters before they are sent out. Improvement action: Complaints Officer review of correspondence will continue, and training will reinforce the importance of defining the complaint clearly and checking the resident's desired outcome.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are	Yes	This is covered when we write to the complainant. Evidence: acknowledgement letters

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	not, responsible for and clarify any areas where this is not clear.		
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	Complaints training and weekly drop-ins cover the need to deal with complaints on their merits, act independently, keep an open mind, give residents a fair chance to set out their position, address conflicts of interest and consider evidence carefully. The Complaints Officer reviews complaints in the first instance and allocates a suitable complaint handler, with attention to independence and any potential conflict of interest. The Complaints Officer also reviews outcome letters before they are sent. Evidence: Complaints training; weekly drop-ins; Complaints Officer allocation process; outcome letter review; complaints tracker. Practice reflection: The process is compliant and has strengthened during 2025/26. However, learning from complaints shows that residents sometimes experience complaint handling as defensive or insufficiently empathetic. We therefore recognise that independence and fairness must be demonstrated not only through process but also through the tone, evidence and reasoning in written responses and resident contact. Improvement action: We will update the staff Code of Conduct to include expectations around complaint handling behaviour, including professional curiosity, accountability, respectful communication and a learning-focused approach.
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	Where a response will fall outside Code timescales, staff are expected to explain the reason, confirm the revised timescale and agree appropriate updates with the resident. The Complaints Officer oversees this process. Evidence: Extension letters; complaints tracker; quarterly complaints reports. Practice reflection: The policy and templates are compliant. Practice has improved, but the annual complaints performance shows that the 100% target of responding within the Code timescales was not achieved. In 2025/26, 99 of 109 landlord services Stage 1 complaints due a response were responded to on time. At Stage 2, 14 of 16 complaints due a response were responded to within the required timescale. Improvement action: Response times will continue to be monitored monthly and quarterly. The Complaints Officer now sends all correspondence, which provides an additional check on timeliness and content and ensuring any unavoidable delays are communicated to the resident.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The Complaints Policy commits to making reasonable adjustments where needed. Support and communication needs are recorded in resident records where known, and complaint handlers are expected to consider these when communicating with residents and investigating complaints. Evidence: Complaints Policy; resident support records; complaints training; Ombudsman case learning; quarterly complaints reports. Practice reflection: The policy is compliant. However, open Ombudsman cases and complaint themes show that reasonable adjustments and vulnerability considerations must be recorded and evidenced more consistently. Improvement action: We will strengthen recording of agreed reasonable adjustments, ensure they are referenced in complaint handling where relevant, and keep adjustments under review as part of ongoing support and complaint management.
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. Evidence: complaints tracker. Practice Reflection: 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	Complaint records are kept on Inform. Where complaints relate to repairs or maintenance, relevant information may also be held on property systems such as Joblogic. Records include the original complaint, correspondence, outcome letters, supporting evidence and actions. Evidence: complaints records; Joblogic/property system records; complaints tracker; quarterly and annual complaints reports. Practice reflection: Records are held, but the 2025/26 complaints evidence shows that improvement is needed in ensuring all actions, updates and supporting evidence are consistently recorded in one clear audit trail. This is particularly important where updates are given verbally or where remedies and outstanding actions are being tracked after the complaint response has been issued. Improvement action: We will strengthen action tracking and recording on Inform, including evidence of verbal updates, completion of remedies and follow-up actions.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: list of complaints handlers, low number of stage 2 escalations, complaints policy, compensation policy. Practice reflection: Complaints Handlers do have the appropriate level of authority to remedy complaints at the stage that they are assigned to it.
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. Evidence: Complaints Policy, ASB Policy, occupancy agreements, Behaviour Management Policy & Procedures (for 16/17 year old residents), Visitor Policy, correspondence in relation to a couple of complaints where we had to inform a resident that their behaviour/ communication with us was no longer acceptable. Practice Reflection: Whilst it is very rare, we have had to inform a number of residents over the last year that their behaviour towards our staff during the complaints handling process was inappropriate. In the cases during 25/26, we explained to them how their behaviour was unacceptable and asked the residents to only communicate with us via a specific route.
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. Evidence: Complaints Policy, ASB Policy, correspondence in relation to a couple of complaints where we had to inform a resident that their behaviour/ communication with us was no longer acceptable. Practice Reflection: We believe our restriction have been proportionate to date. Given that most of our properties are supported housing projects, all residents continue to have a point of contact that is appropriate to their support needs even when restrictions of some sort have had to be put in place.

Section 6 - Complaint Stages

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: complaints response times. In relation to vulnerability: risk assessments, support plans; Practice reflection: In most cases we are able to resolve stage 1 complaints within the required 10 days (or earlier where possible).
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	The Complaints Policy sets out that Stage 1 complaints must be acknowledged, defined and logged within five working days. Acknowledgement templates are in place and the Complaints Officer monitors compliance. Evidence: Complaints Policy; acknowledgement templates; complaints tracker; quarterly complaints reports. Practice reflection: The policy is compliant. Practice is generally strong, but Q4 identified examples where a complaint was not put on the system promptly by the staff member who received it, and where correspondence errors affected compliance. This shows that the process depends on timely escalation by all staff, not only the Complaints Officer. Given the number of complaints where we did not meet the timescale were low, we feel overall we are compliant with the Code. Improvement action: Staff training will reinforce the requirement to pass complaints to the Complaints Officer promptly and not wait until the final acknowledgement deadline.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	The Complaints Policy sets out that full Stage 1 responses must be issued within 10 working days of acknowledgement, with extensions used only where appropriate. Evidence: Complaints Policy; outcome letter templates; complaints tracker; annual complaints performance report. Practice reflection: In 2025/26, for landlord services, 109 Stage 1 complaints were due a response and 99 were responded to on time. The annual TSM CH02 (1) Stage 1 performance for 25/26 was 94%. Performance has improved and remains above 90% for Stage 1, but it did not meet our 100% target. We recognise that the Code requires consistent compliance and that late responses, even where infrequent, can affect resident trust. Given the number of complaints where we did not meet the timescale were low, we feel overall we are compliant with the Code.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			Improvement action: Continue monthly monitoring at director level, daily Complaints Officer oversight and correspondence checks will continue, with exceptions reviewed for learning.
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. Evidence: Complaints Policy, complaints tracker, TSM CH02 (1) results Practice Reflection: A monthly check looking back on all complaints responded to during that month checks on compliance with the time frame, including whether the resident was informed of any delay. In 2025/26, extensions were mainly due to delays in gathering information (staff absences etc.). Improvement action: Strengthening tracking and oversight to reduce delays; reinforcing staff guidance on communicating extensions clearly and on time.
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 within the extension letter templates. Evidence: Extension letters issued during 25/26, extension letter template Practice reflection: The Complaints Officer checks and issues all extension letters.
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	Outcome letters are issued when the answer to the complaint is known, rather than waiting for all outstanding actions to be completed. Managers have been reminded that outstanding actions should be clearly set out, tracked and updated. Evidence: Outcome letter templates, actual outcome letters issued, complaints tracker Practice reflection: The policy and templates are compliant. However, due to the nature of supported housing, updates are often provided verbally to residents. This means there is a risk that we cannot always evidence that actions were tracked through to completion or that residents were kept updated. Improvement action: We will strengthen recording of outstanding actions, remedies and verbal updates on our complaints tracker (Inform), so that there is a clear audit trail from complaint response to completion.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 they are sent. Evidence: Outcome letter templates, actual outcome letters issued, complaints tracker Practice reflection: We recognise that, in some cases, draft responses have been sent to the Complaints Officer too close to the deadline, limiting time for review. Improvement Action: Reinforcing that draft responses must be shared with the Complaints Officer in advance of deadlines; Strengthening quality checks to ensure all complaint points are fully addressed and clearly explained, with appropriate remedies offered where necessary.
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 and monitored by the Complaints Officer. Evidence: actual outcome letters issued, complaints tracker Practice Reflection: There has been a number of complaints during the year where the complainant added additional matters to the complaint whilst it was being investigated. If it was appropriate for the same complaints handler to investigate those additional matters and the stage 1 response had not been issued yet, these were brought into the original complaint. If they were unrelated matters or a stage 1 response had already been issued, a new complaint was logged.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	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 they are sent. Evidence: actual outcome letters issued, complaints tracker Practice reflection: We recognise that while templates are in place, consistency can vary depending on how clearly complaint points are defined and addressed. We therefore require all letters to be sent to the Complaints Officer for checking before they are sent out. Improvement Action: Reinforcing the importance of clearly setting out the complaint definition and addressing each point; Providing guidance to ensure responses are written in plain language and are easy to understand; Continuing central checks to ensure all required elements are included before issue.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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. Evidence: Complaints Policy, complaints tracker
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	The Complaints Policy sets out that Stage 2 complaints must be acknowledged, defined and logged within five working days. Acknowledgement templates are in place and the Complaints Officer monitors compliance. Evidence: Complaints Policy; acknowledgement templates; complaints tracker; quarterly complaints reports. Practice reflection: The policy is compliant. Practice is generally strong for stage 2 complaints. However, during 25/26, 4 x Stage 2 complaints escalations were acknowledged outside of the 5 working day requirement. Given the number of complaints where we did not meet the timescale were low, we feel overall we are compliant with the Code. Improvement action: Daily Complaints Officer oversight and correspondence checks will continue, with exceptions reviewed for learning.
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 and supported by the Complaints Officer in practice. Evidence: Complaints Policy; Stage 2 acknowledgement letters. Practice reflection: The Complaints Officer supports the Complaints Handlers with this (including reaching out to complainant to get further information to ensure we have a full understanding of why the resident remains unhappy).
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. Evidence: Complaints Policy; complaints tracker showing responsible complaints managers at each stage. Practice reflection: The Complaints Officer assigns all complaints handlers and ensures that is always a different person (usually someone more senior where possible) and someone independent from the complaint.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	The Complaints Policy sets out that Stage 2 final responses must be issued within 20 working days of acknowledgement, with any extension managed in line with the Code. Evidence: Complaints Policy; Stage 2 templates; complaints tracker; annual complaints performance report. Practice reflection: The policy is compliant, and most Stage 2 responses were issued on time. However, the TSM result and quarterly monitoring show that Stage 2 compliance continues to require close oversight. In 2025/26, 16 Stage 2 complaints were due a response across landlord services. Of these, 14 were responded to within the required timescale. The annual TSM CH02 (2) Stage 2 performance was 78%, calculated using the TSM methodology. Improvement action: Stage 2 cases will continue to receive senior manager oversight, with the Complaints Officer checking acknowledgements, extensions and final responses.
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. Evidence: Complaints Policy, complaints tracker, TSM CH02 (2) results Practice Reflection: A monthly check looking back on all complaints responded to during that month checks on compliance with the time frame, including whether the resident was informed of any delay. In 2025/26, extensions were typically due to: complexity of cases (including where legal advice was required), delays in gathering information from different teams.
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 within the extension letter templates. Evidence: Extension letters issued during 25/26, extension letter template Practice reflection: The Complaints Officer checks and issues all extension letters.
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. Outcome letters are issued when the answer to the complaint is known, rather than waiting for all outstanding actions to be completed. Managers have been reminded that outstanding actions should be clearly set out, tracked and updated. Evidence: Outcome letter templates, actual outcome letters issued, complaints tracker Practice reflection: The policy and templates are compliant. However, due to the nature of supported housing, updates are often provided verbally to residents. This means there is a risk that we cannot always evidence that actions were tracked through to completion or that residents were kept updated.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			Improvement action: We will strengthen recording of outstanding actions, remedies and verbal updates on our complaints tracker (Inform), so that there is a clear audit trail from complaint response to completion.
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 they are sent. Evidence: Outcome letter templates, actual outcome letters issued, complaints tracker Practice Reflection: We recognise that, while processes are in place, clarity and consistency can vary. We therefore ensure all outcome letters are reviewed by the Complaints officer before they are issued. Improvement Action: Reinforcing the need to address each complaint point clearly; Supporting staff with good practice in responses; Continuing central checks to ensure all responses are complete, clear and easy to understand
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 they are sent. Evidence: actual outcome letters issued, complaints tracker Practice Reflection: We recognise that, while processes are in place, clarity and consistency can vary. We therefore require all letters to be sent to the Complaints Officer for checking before they are sent out. Improvement Actions: Reinforcing the need to clearly explain decisions and link them to evidence; Continuing central checks to ensure responses are complete, consistent and easy to understand
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 is in line with the code. Our outcome letters explain 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 or they are unhappy about how we have handled the complaint. Relevant staff are involved in the investigation to ensure a full and informed response. Evidence: Complaints policy, actual outcome letters issued, complaints tracker Practice Reflection: We recognise that involvement of all relevant teams can vary depending on the case, and clear coordination is important to ensure a complete response.

Section 7 - Putting Things Right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The template outcome letters cover the need to acknowledge if something has gone wrong and the action to be taken to put things right. We have also now developed a compensation policy that sits alongside the complaints policy. A range of remedies is considered, including apologies, explanations, actions, and financial compensation, supported by our Compensation Policy. Evidence: complaints tracker, outcome letters, compensation policy, complaints policy Practice Reflection: Complaints outcomes are tracked on the system and we review regularly how we have put things right. We do recognise that the quality and consistency of responses can vary, particularly in providing clear and meaningful apologies; giving full explanations of what went wrong and why. Improvement Action: Reinforcing the importance of clear apologies and transparent explanations; Supporting staff to focus on putting things right and learning from outcomes; Continuing to review complaint outcomes to ensure remedies are appropriate and consistent.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints handlers, with the support from the Complaints Officer, do consider what impact any fault on our part had on the resident when considering the remedy offered. Evidence: This can be evidenced through our outcome letters, compensation policy Practice Reflection: We recognise that, while impact is considered, it is not always clearly evidenced or explained consistently in responses. Improvement Action: Supporting staff to clearly explain the impact on the resident and how this links to the remedy offered; Reinforcing use of the Compensation Policy to ensure fair and proportionate outcomes; Continuing quality checks to improve consistency and clarity in responses
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	Outcome letters are expected to set out any remedy, what will happen, who is responsible and by when. Remedies may include apologies, explanations, service actions, compensation or changes to practice. Evidence: Outcome letter templates; actual outcome letters sent; compensation policy; complaints tracker; quarterly and annual complaints reports. Practice reflection: The policy is compliant. However, further work is required to ensure remedies and actions are consistently tracked through to completion and that there is evidence that residents have been updated. This is particularly important where actions relate to repairs, contractor performance, compensation, service disruption or safeguarding. Improvement action: We will strengthen the action-tracking process on Inform and ensure managers provide evidence when remedies have been completed.

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Compensation Policy was recently updated (May 2026) to take account of the Ombudsman's guidance around remedies and compensations. We will also take account of any guidance issued by the Ombudsman in relation to any specific complaints. Evidence: updated compensation policy (May 2026), outcome letters, ombudsman portal tracker Practice reflection: While guidance is built into our policy, consistent application across all cases can vary. Improvement Actions: Reinforcing staff awareness of Ombudsman guidance and case outcomes; Using Ombudsman decisions and learning to inform complaint handling and remedies; Continuing oversight and quality checks to ensure consistent and proportionate outcomes
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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: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements; - 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; - any findings of non-compliance with this Code by the Ombudsman; - the service improvements made as a result of the learning from complaints; - any annual report about the landlord's performance from the Ombudsman; and - any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	An annual complaints performance and service improvement report has been produced for 2025/26. The report includes quantitative and qualitative analysis of complaint handling performance, complaint themes, refused complaints, service improvements, Ombudsman contact and the annual self-assessment against the Code. Evidence: Annual Complaints Performance and Service Improvement Report 2025/26; annual complaints tracker; quarterly complaints reports; MRC reports; Resident Representative Committee reports. Practice reflection: Reporting arrangements are compliant. We also recognise that the annual report should be transparent about both strengths and areas for improvement. The 2025/26 report acknowledges that complaint handling response times did not meet the 100% target, that the TSM complaints handling satisfaction score dropped from the previous year, and that resident focus group actions are being implemented to improve awareness, communication and trust. In 2025/26, YMCA St Paul's Group received 105 Stage 1 complaints and 18 Stage 2 escalations in relation to landlord services. The main landlord services themes were repairs and maintenance, staff attitude and support, housing management and compensation claims. The annual report also records 111 submissions received via the complaints platform, but re-directed to other processes and gives the reasons for these decisions.

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 25/26 and the board's response will be published on the website once available and by the required deadline (30 September 2026).
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 section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Complaints are reviewed to identify wider learning, not only to resolve the individual issue. Learning is recorded in the complaints tracker and reported through quarterly and annual complaints reports. Evidence: Annual complaints tracker; quarterly complaints reports; annual complaints performance report; lessons learned logs. Practice reflection: The 2025/26 learning shows recurring themes around residents feeling unheard, delays or lack of visibility, staff tone and professionalism, repairs communication, contractor performance, safeguarding and trauma-informed practice. This evidence demonstrates that we are using complaints to identify service improvement priorities, but also shows that further work is needed to embed learning consistently across all services. Improvement action: A cross-departmental lessons learned review was completed on 15 January 2026 but we have identified that we need to do more to embed any learning. Learning will continue to be shared through manager briefings, training and quarterly reporting.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 are treated as a source of intelligence and are reviewed for themes and trends. The 2025/26 annual report identifies key themes across all services, including communication, responsiveness, staff conduct, repairs, contractor management, safeguarding, support and the need for more consistent recording and oversight. Evidence: Annual complaints tracker; annual complaints performance report; quarterly reports; resident focus group action plan. Practice reflection: The organisation has made improvements, including clearer templates, greater Complaints Officer oversight, training, resident communication materials, contractor performance monitoring and service improvement actions. However, the drop in TSM complaints handling satisfaction and resident focus group feedback show that residents may not yet consistently experience the complaints process as clear, responsive or learning-focused. Resident-facing materials, staff training and complaints communication improvements are being progressed as part of the resident focus group action plan.
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	Complaints performance and learning are reported to the Resident Representative Committee, the Member Responsible for Complaints, the Performance Committee, the Executive Team and the Board as required. The annual complaints report and self-assessment are published once approved, alongside the Board response. Evidence: Quarterly complaints reports; MRC reports; Resident Representative Committee reports; annual complaints report; Board reporting. Practice reflection: Governance and reporting arrangements are compliant. We will continue to strengthen resident scrutiny by ensuring resident representatives receive clear updates on complaint themes, learning, focus group actions and progress against improvements. Improvement Action: We will be holding another resident focus group during 2026/27 to look at our TSM result in relation to our approach to complaints handling which dipped from 31% in 2024/25 to 26% in 2026/27.
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 who is part of our Executive Team.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The MRC and governing body receive regular information on complaint volumes, categories, outcomes, handling performance, themes and learning. Quarterly reports go to the MRC and are then escalated to the Performance Committee and Board as required. The annual self-assessment and annual complaints report go to the MRC, Resident Representatives, Performance Committee and Board. Evidence: Quarterly complaints reports; MRC quarterly review; annual complaints performance report; annual complaints tracker. Practice reflection: The reporting framework is compliant and has matured during 2025/26. Further improvement will focus on ensuring reports provide not only data, but also clear assurance on actions completed, resident impact and whether learning has been embedded.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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: - have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; - take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and - act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	The organisation considers that the expectations in this provision should apply to all relevant staff because any staff member may receive a complaint, contribute to resolving a complaint or influence a resident's experience of the complaints process. The organisation therefore intends to embed these expectations through the staff Code of Conduct, complaints training, manager briefings and relevant objectives where appropriate. Evidence: Complaints policy; staff training; planned Code of Conduct update; resident focus group action plan. Practice reflection: The principle is compliant, but further work is required to ensure the expectation is consistently visible and embedded. The 2025/26 complaints evidence shows that a collaborative, non-defensive and learning-focused approach is essential, particularly where complaints involve multiple teams such as housing, support, property, repairs and contractors. Improvement action: The Code of Conduct will be updated to include clear expectations around complaint handling, including collaborative working, collective responsibility, respectful communication, professional standards and learning from complaints.

IMPROVEMENT ACTIONS TRACKER

Code Section(s)	Improvement Action	Owner	By when
1.3, 1.4, 3.2, 6.2	Develop and deliver a standardised staff training module covering how to recognise complaints, distinguish complaints from service requests, submit complaints on the system and pass complaints promptly to the Complaints Officer.	Complaints Officer / Executive Lead for Complaints / relevant managers	During 2026/27; annual refresh thereafter
1.4, 3.1, 3.4	Publish updated resident posters, resident-facing video and digital communications explaining how to complain, what happens next and the difference between a complaint and a service request, including translated versions in key resident languages.	Complaints Officer / Communications / Housing and Support Managers	Posters by August 2026/27; website review by Q2 2026/27
2.1, 2.2, 2.4	Continue Complaints Officer oversight of non-accepted complaints and strengthen written explanations so residents understand the reason for any decision not to accept or escalate a complaint and their right to contact the Housing Ombudsman.	Complaints Officer / Executive Lead for Complaints	Ongoing during 2026/27
4.3, 5.8, 9.8	Update the staff Code of Conduct to include clear expectations around complaint handling behaviour, professional curiosity, accountability, collaborative working, collective responsibility, respectful communication and learning from complaints.	Executive Lead for Complaints / People Team / Executive Team	October 2026
4.3	Continue customer service, PIE, trauma-informed and de-escalation refresher training where complaints evidence shows this is needed.	Heads of Service / Learning and Development / Managers	Ongoing during 2026/27
5.6, 6.7, 6.9, 6.18, 6.19	Continue Complaints Officer review and central correspondence checks to ensure complaint definitions are clear, desired outcomes are checked, all complaint points are addressed, decisions are explained and responses are written in plain language.	Complaints Officer / Complaint Handlers / Managers	Ongoing during 2026/27
5.9, 6.3, 6.4, 6.11, 6.14	Continue monthly and quarterly monitoring of complaint response times, with exceptions reviewed for learning and senior oversight of Stage 2 acknowledgements, extensions and final responses.	Complaints Officer / Executive Lead for Complaints / Senior Managers	Monthly and quarterly during 2026/27
5.10	Strengthen recording of agreed reasonable adjustments, ensure relevant adjustments are referenced in complaint handling and keep adjustments under review as part of support and complaint management.	Housing and Support Managers / Complaints Officer	During 2026/27; ongoing review
5.12, 6.6, 6.17, 7.3	Strengthen action tracking and recording on Inform, including outstanding actions, remedies, verbal updates, completion evidence and follow-up actions from complaint response to completion.	Complaints Officer / Managers / Complaint Handlers	During 2026/27
7.1, 7.2, 7.4	Support staff to provide clear, sincere apologies, transparent explanations, proportionate remedies and clear links between resident impact, the Compensation Policy and Ombudsman guidance.	Complaints Officer / Managers / Complaint Handlers	Ongoing during 2026/27
9.1	Embed learning from the cross-departmental lessons learned review through manager briefings, training and quarterly reporting, with clearer evidence that learning has been implemented.	Executive Lead for Complaints / Heads of Service / Managers	Quarterly during 2026/27
9.3	Hold a further resident focus group during 2026/27 to review the TSM complaints handling satisfaction result and test whether resident communications and complaint handling improvements are making a difference.	Resident Engagement / Complaints Officer / Executive Lead for Complaints	During 2026/27