

Housing Ombudsman Complaint Handling Code Self-Assessment



Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Section 2.1 of the Complaints Policy	The Policy is publicly available on the Railway Housing Association website and definition of a complaint aligns with the Housing Ombudsman definition.
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	Section 2.2 of the Complaints Policy ('Complaint') Section 3.7 of the Complaints Policy (third party)	The Policy confirms that the word complaint does not need to be used and all colleagues have received MGI Training on Complaint Handling and internal awareness through an intranet post.
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	Yes	Section 2.1 of the Complaints Procedure	The procedure sets out the difference between a service request and a complaint and this is available on the website.

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	requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			
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.	Partially	Section 2.1 of the Complaints Procedure	Section 2.1 sets out when a service request should become a complaint, however, the Procedure should be strengthened to be explicit that the service request should not stop.
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.	Partially	Section 7 of the Complaints Procedure	Section 7 sets out what would happen if dissatisfaction was reported through the Complaints Customer Satisfaction process, and operational practice is to review negative feedback and contact the resident individually for more information. The procedure should be strengthened to include the specific approach to dissatisfaction through satisfaction surveys.

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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 3.25, 3.26 and 3.27 of the Complaints Policy	The policy sets out circumstances in which a complaint will be declined. It would be helpful to align to the Housing Ombudsman definition in the policy review.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been 	Yes	Section 3.25, 3.26 and 3.27 of the Complaints Policy	The policy sets out circumstances in which a complaint will be declined. It would be helpful to align to the Housing Ombudsman definition in the policy review.

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	considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy and Procedure	The Complaints Policy and Procedure do not currently have a time limit on complaints, which means that complaints will be accepted over and above the Housing Ombudsman definition.
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	Section 3.27 of the Complaints Policy	The Complaints Policy sets out that an explanation will be provided and that the resident is able to challenge this with the Housing Ombudsman, who may instruct an investigation.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 2.6 of the Complaints Procedure	This section sets out that a Manager will contact the resident to understand the entire situation before making a decision. This

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				element should be strengthened in the policy and procedure review.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Section 3.8 of Complaints Policy Complaints Leaflet for Customers includes alternative languages and advice of third party organisations that could assist.	We will offer support to help complainants with specific needs to make their complaint, for example, providing an interpreter, a sign language interpreter, allowing more time than usual for information to be provided by the complainant, providing information in alternative formats such as large print or Braille, use of email or telephone rather than printed letters, use of Textaloud, use of plain English or Easy Read service, comfort or rest breaks during meetings, and dealing with an advocate or

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				other representative.
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	Section 3.7 of Complaints Policy Complaints Leaflet for Customers	The policy sets out that complaints can be received in person, telephone, letter, email, website, social media or third party. Complaints leaflet also includes a form that can be completed and returned to a freepost address.
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	Section 1.5 of the Complaints Policy Colleague Training	The policy sets out that complaints are a valuable source of information. Colleagues have been trained to encourage the accurate recording of complaints through internally and externally sourced complaints handling training. Board reports on complaints reporting .
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	Yes	Complaints Policy and Procedure Complaints Leaflet for Customers	The Complaints Policy and Procedure are available on the Railway Housing Association website. The Complaints Leaflet is also available online, at head

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	must also be published on the landlord's website.			office and in leaflet racks in the schemes and communal buildings. The policy and leaflet set out the process and timings for stage 1 and 2 and also include the escalation and contact details for the Housing Ombudsman.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Partially	Section 6 of the Complaints Policy	This section sets out how learnings from complaints will be published, however, it does not include information about the publishing of the Code. This should be strengthened in the policy review.
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	Section 3.7, 3.8, 3.9, 3.10 and 3.11 of Complaints Policy	The policy sets out that residents can have a third party deal with their complaint on their behalf. The leaflet also suggests some organisations that could support and assist.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	Complaints Leaflet for Customers Acknowledgement Letter Stage 2 Response Letter	The leaflet, acknowledgement letter and Stage 2 response letter

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	individual can engage with the Ombudsman about their complaint.			outline how the resident can contact the Housing Ombudsman. If an extension is negotiated to the response deadlines, the Housing Ombudsman contact details are also given to the resident should they want to challenge the proposed extension to the response time.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Sections 3.12, 5.1 and 5.2 of Complaints Policy Section 2.4 of Complaints Procedure	The Complaints Policy sets out that a Manager will investigate Stage 1 and a Director Stage 2 and the definition of exact job roles is set out in the Procedure. Section 5 of the Complaints Policy sets out that the Director of Customer Services (role now replaced by Chief Operating Officer)

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				is the 'Complaints Officer' and the Chair of the Board has responsibility for Board reporting. Job titles should be updated in the documentation.
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	Structure	The Chief Operating Officer is part of the Executive Team and has access to all colleagues. Complaint handlers are senior leaders in the organisation with the authority to investigate and resolve. The Chief Operating Officer chairs a weekly Complaints Clinic to ensure that any barriers are removed and investigations and progressing.
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	Colleague Training Complaints Policy Statement	All colleagues have had briefings and received an external training session by MGI Learning, linked to the wider cultural change programme to promote the concept of invaluable feedback and how to use the

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				MGI toolkit to effectively improve customer service, problem resolution and complaint handling.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy	Railway Housing Association only have one complaints policy.
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	Complaints Policy Complaints Procedure	The Complaints Policy has Stage 1, 2 and then Housing Ombudsman and does not have any further 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	Complaints Policy Complaints Procedure	The Complaints Policy has Stage 1, 2 and then Housing Ombudsman and does not have any further stages.

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5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Section 2 of the Complaints Policy	Railway Housing Association directly handle all complaints relating to services provided by or on behalf of Railway Housing Association. If the complaint relates to work carried out by a contract, Railway Housing Association will handle the complaint and liaise with the contractor.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 2 of the Complaints Policy	Railway Housing Association directly handle all complaints relating to services provided by or on behalf of Railway Housing Association. If the complaint relates to work carried out by a contract, Railway Housing Association will handle the complaint and liaise with the contractor.
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	Yes	Complaint Acknowledgement, Stage 1 Response, Stage 2 Response Letter Templates	The standard template documents for the acknowledgement, Stage 1 Response and Stage 2 Response include a section

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	to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			for the complaint handler to outline the complaint definition.
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	The Complaint Acknowledgement Letter Template	The Complaint Template Letter includes a section to explain what the complaint is and if anything is not to be considered.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Section 1.4 and 3.1 of the Complaints Policy Section 1.4, 2.6, 2.9, 2.10 and 2.11 of the Complaints Procedure	The Complaints Policy sets out clearly that complaints should be investigated in a fair manner and should align to the Housing Ombudsman principles of dispute resolution. The Procedure sets out how residents will have an opportunity to ensure they can set out their view and also receive detailed feedback on the decision. The procedure also sets out the resolutions and factors that will be considered.
5.9	Where a response to a complaint will fall	Partially	Section 3.17 and 3.20 of the	The policy and procedure

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	outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.		Complaints Policy Section 2.7 of the Complaints Procedure	set out the timescales for resolution and the option to extend by agreement if the timescale cannot be achieved. The procedure sets out the aim for no longer than 10 additional working days. The procedure should be strengthened to specifically record agreed update intervals for the resident.
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	Section 1.2, 3.8 and 3.9 of the Complaints Policy Section 2.6 of the Complaints Procedure	The policy and procedure set out Railway's commitment to supporting residents with reasonable adjustments. Any vulnerabilities or disabilities are recorded on the Cx Housing Management system. This area should be strengthened in line with the work to improve compliance with the consumer standards.
5.11	Landlords must not refuse to escalate a complaint through all stages of the	Yes	Section 3.25, 3.26 and 3.27 of the Complaints Policy	The policy sets out circumstances in which a

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	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.			complaint will be declined. It would be helpful to align to the Housing Ombudsman definition in the policy review.
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.	Partially	Complaints Spreadsheet Civica Cx System	Complaints are currently managed through a combination of a spreadsheet to record centrally, and individual communication with a resident through the Civica Cx system. A case management approach is being implemented for complaint handling to move all interactions and the investigation into the Cx system. This is currently in test and will be live by July 2024.
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	Yes	Section 2.2, 3.12, 3.17, 3.22 and 3.29 of the Complaints Policy Section 2.10 of the Complaints Procedure	The policy and procedure set out the desire to resolve complaints as early as possible and also the resolutions that should be considered.

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	need for escalation.			
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	Section 4 of the Complaints Policy	Section 4 of the Policy sets out the Association's approach to unreasonable behaviour.
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	Section 4 of the Complaints Policy	Section 4 of the Policy sets out the Association's approach to unreasonable behaviour and consideration of vulnerability and alternative approaches.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation.	Yes	Section 2 of the Complaints Procedure Colleague Training	The procedure sets out that colleagues are able to resolve things quickly for minor issues. All colleagues

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	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.			have had training from MGI about effective handling of dissatisfaction and tools to resolve quickly and effectively.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Section 3.13 of the Complaints Policy	All complaints should be acknowledge within two working days.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 3.20 of the Complaints Policy	All Stage 1 complaints will be responded to within 10 working days of being received, which is a slight variation on the Housing Ombudsman definition. Performance data will be published quarterly.
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	Yes	Section 3.20 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out how the timescales can be extended and the procedure confirms this should be not longer than a further 10 working days.

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	working days without good reason, and the reason(s) must be clearly explained to the resident.			
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	Section 3.20 of the Complaints Policy	The policy sets out that the Housing Ombudsman details will be provided in all letters extending the timescales.
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.	No		There is insufficient guidance in the policy or procedure to confirm that this is the approach and there are evidence of complaints that have been held open until the issue is resolved rather than the answer known. The policy and procedure require review and further guidance to ensure all colleagues are aware of this.
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	Section 3.21 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed.

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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	Section 2.8 of the Complaints Procedure	The procedure sets out our approach to additional complaints and how to respond.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Section 3.21 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options.

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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy Complaints Procedure	The Complaints Policy has Stage 1, 2 and then Housing Ombudsman and does not have any further stages.
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	Section 3.2 of the Complaints Procedure	The procedure confirms that all Stage 2 requests should follow the same timescales for acknowledgement as Stage 1, which is 2 days.
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.	Partially	3.17 of the Complaints Policy	The policy confirms that the colleague investigating the complaint should contact the resident to understand the complaint fully. This is not explicit for Stage 2 and needs to be strengthened in the policy review.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 3.1 of the Complaints Procedure	The procedure sets out that the Stage 2 investigator must not be the same person as Stage 1 and also sets out who should deal

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				with Stage 2 depending on the Stage 1 handler.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 3.12 of the Complaints Policy Section 3.2 of the Complaints Procedure	The policy and procedure set out the response timescales of 20 working days from receipt of the request to escalate. This is a slight variation from the Housing Ombudsman definition.
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	Section 3.2 of the Complaints Procedure	The procedure sets out that an extension at Stage 2 should be no more than 10 working days,
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 3.20 of the Complaints Policy	The policy sets out that the Housing Ombudsman details will be provided in all letters extending the timescales.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	No		There is insufficient guidance in the policy or procedure to confirm that

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	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.			this is the approach and there are evidence of complaints that have been held open until the issue is resolved rather than the answer known. The policy and procedure require review and further guidance to ensure all colleagues are aware of this.
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	Section 3.21 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and 	Yes	Section 3.21 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options.

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	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Structure	All Stage 2 complaint investigators are Executive Team members and therefore have appropriate access to all colleagues required to be involved.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been 	Yes	<p>Section 3.21 and 3.22 of the Complaints Policy Section 2.9 of the Complaints Procedure</p>	<p>The policy and procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options.</p>

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	<ul style="list-style-type: none"> • delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 3.22 of the Complaints Policy	The policy sets out that consideration will include the length of time, frequency, severity, individual circumstances and any vulnerabilities when considering a resolution.
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	Section 3.21 and 3.22 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 3.21 and 3.22 of the Complaints Policy Section 2.9 of the Complaints Procedure	The policy and procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options.

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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord’s performance from the Ombudsman; and f. any other relevant reports or publications produced by the 	Partially	Section 6 of the Complaints Policy Annual Newsletter to Residents	<p>The annual report to accompany this self assessment is being published for the first time in 2024. This should remain as partial until published.</p>

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	Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Partially	Board Meeting 12 June 2024	This self assessment and the annual report have been presented at Board on 12 June 2024. Following approval, it will be published on the website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Partially		This element needs to be explicit within the Complaints Policy. There has not been such a change at Railway Housing Association to date.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Railway Housing Association will comply with any request from the Housing Ombudsman. To date, there have been no requests.
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	Partially		This element needs to be explicit within the Complaints Policy.

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	affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 6 of the Complaints Policy Management Team Agenda	Complaint trends and service improvements are discussed monthly at Leadership Team meetings. A learning log has been created to capture learnings and to track the implementation of changes for 2024/25.
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	Section 6 of the Complaints Policy Management Team Agenda	Complaint trends and service improvements are discussed monthly at Leadership Team meetings. A learning log has been created to capture learnings and to track the implementation of changes for 2024/25.
9.3	Accountability and transparency are also integral to a positive complaint	Partially	Section 6 of the Complaints Policy	The policy sets out how learnings will be shared,

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	handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			however, this does require strengthening to demonstrate more robust compliance. Complaint handling will be reported to the new Resident Committee once established in 2024.
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	Structure Complaints Policy	The policy sets out that the senior member of staff responsible for complaints. This requires updating due to new roles. The Chief Operating Officer is responsible for complaint handling.
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	Complaints Policy	The policy sets out that the Member Responsible for Complaints is the Chair of the Board.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's	Partially	Board Minutes	Complaint performance is reported to the Board on a quarterly basis, however, this requires strengthening

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	complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.			with greater detail. This will also be presented to the Resident Committee in advance of Board once established in 2024.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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. 	Partially	Board Minutes	Information on performance of complaint handling is reported quarterly and the annual self assessment and report are presented to the Board. From 2024, this will be quarterly to enable more transparency and information on complaint trends and learnings.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co- 	Partially	Complaints Policy	The policy statement confirms the Association's commitment to complaint handling and learning, however, this requires

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	<p>operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>strengthening to be more explicit of the Housing Ombudsman's objectives.</p>
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