

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 3.1: <i>A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents</i>
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 3.5 and 3.6 states: <i>The customer does not have to use the word ‘complaint’ for it to be treated as such. 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. A complaint that is submitted via a third party or representative will still be handled in line with our complaints policy</i>

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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 3.1, 3.2, 3.3, 3.4 and 3.5 states: <i>We have a clear distinction between a request for a service (service request) and a complaint about a service. This policy relates to complaints about services. Service requests will be treated as a complaint if we fail to deal appropriately with the initial request.</i> <i>Service requests will also be logged as a complaint if further enquiries are needed to resolve the matter, or if the customer requests it.</i> <i>The customer does not have to use the word ‘complaint’ for it to be treated as such.</i> <i>Service requests are recorded, monitored and reviewed regularly.</i>
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	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 3.2, 3.3 and 3.4. <i>We have a clear distinction between a request for a service (service request)</i>

	the service request if the resident complains.			<i>and a complaint about a service. This policy relates to complaints about services. Service requests will be treated as a complaint if we fail to deal appropriately with the initial request. Service requests will also be logged as a complaint if further enquiries are needed to resolve the matter, or if the customer requests it or if they express dissatisfaction with the response.</i> Our service managers continue to take action to resolve issues for the customer and that a complaint has been made does not adversely impact on this.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes		Customer Relations Manager reviews the customer satisfaction survey feedback each month. They then devise and implement an action plan, each month, so that, where possible, the person completing the survey can be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. If a resident wishes to make a complaint, how to do this is available from any staff member, on our website and in our complaints policy. We advise customers through the survey feedback process how they can raise a complaint

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 4.3 and 4.8- <i>Exclusions: Where we have advised a customer that we are not accepting a complaint, the customer will have the right to challenge this decision and raise a complaint to the Housing Ombudsman Service. Details of how to contact the Housing Ombudsman can be found at section 5.) of our complaints policy: Customers can also request contact details of the Housing Ombudsman from a staff member.</i> The responsibility for the final decision not to accept a complaint lies with the Head of Customer Services, in order to ensure any decisions to this point are

				made by a senior person and ensures a fair and reasonable approach.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy (copy in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Examples of acceptable exclusions are provided within the 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 – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy (copy provided) at section 4.2 and 4.6 . Complaints related to issues over 12 months old may be accepted at discretion if

				there's a valid reason for the delay, such as safeguarding or health and safety concerns . Older reports may also be considered for background if this helps resolve a long standing matter within a complaint . The final decision to refuse a complaint rests with the Head of Customer Services or an Executive Director to ensure fairness and senior oversight.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.2, 4.7 and 4.8. If we do not accept a complaint, we will provide a clear explanation of why it's not suitable for our process. Customers can challenge this decision by contacting the Housing Ombudsman Service, as outlined in section 5.0 of our complaints policy. Contact details for the Ombudsman

				are available on our website , are included in our correspondence or can be provided by staff members.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.3 and 4.4 - Exclusions: <i>We will accept a complaint unless there is a valid reason not to do so.</i> <i>We adopt a fair and reasonable approach in these circumstances. Each complaint is considered on its own merits.</i> Our complaints team and complaint handlers are trained in the triaging and assessment of complaints.

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	Complaints policy – Kate to add link when approved and uploaded https://www.originhousing.org.uk/media/2i3plunn/reasonable-adjustments-policy.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint) and section 10 (Equality) <i>We ensure customers can easily make a complaint without restriction. Customers can express their dissatisfaction in whichever way they choose.</i> The range of ways in which a complaint can be made is set out in the policy. Our Reasonable Adjustments Policy guides our teams on where adjustments need to be made. Our team are able to view resident profile information on our

				CRM system which guides them on any additional needs a customer may have which they need to take into account.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint) All staff at Origin are aware of the complaints process and are aware the complaints central mailbox is the route to log all received complaints (no matter how received) in order to initiate the complaints process. Customers can independently access this route, and other complaint registering channels too.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and	Yes	N/A	We support and encourage a positive complaint handling process. Volumes of complaints are monitored weekly and monthly and shared with

	accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.			the MRC (Member Responsible for Complaints) and Executive team each month. We analyse complaints to understand the drivers and root cause sharing this with colleagues across key services.
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	Complaints policy – Kate to add link when approved and uploaded	Complaints Policy on our website. Information leaflets are available and customers can request the policy in other formats .
3.5	The policy must explain how the landlord will	Yes	Complaints - Origin Housing	This code section and requirement is set out in our current Complaints

	publicise details of the complaints policy, including information about the Ombudsman and this Code.			Policy at section 12 (Communication and Publicising of the Policy) Our complaints policy is also published on our website alongside information about our complaints procedure. The complaint handling code and how we work with the Ombudsman is also on our website and can be found here: Housing Ombudsman - Origin Housing Copies of our self - assessments can also be found on the same page. We advise customers about the Housing Ombudsman Scheme, in leaflets – which can be found in our Head Office Reception and include reference to the scheme in our complaint acknowledgement and formal complaint response emails send during the complaints process. The Housing
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				Ombudsman Scheme is referenced in our Complaints policy too, at section 5
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.1 Customers are welcome to make a complaint via an advocate. Where a complaint is made via an advocate, we will need the customer's written consent. An advocate or representative, on behalf of the customer, can also deal with their complaint. They can also represent or be present or accompany the customer at any meeting with us, where this is reasonable
3.7	Landlords must provide residents with information on their right to access the Ombudsman	Yes	Complaints policy – Kate to add link when approved and uploaded	The Housing Ombudsman Scheme is referenced in our Complaints policy at section 5.0. We also include this information at each stage of our

	service and how the individual can engage with the Ombudsman about their complaint.			complaints process in the communications to customers. This includes the complaint acknowledgement and both stage 1 and stage 2 formal responses. We also advertise the Housing Ombudsman Scheme, in leaflets and posters – which can be found in our Head Office Reception
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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	Team structure – available on request	We have a dedicated Customer Relations Team, who are assigned the responsibility for complaint handling. The management of this team is led by a Customer Relations and Quality Assurance Manager, who oversees the activity of the Team is the lead for all interactions with the Housing Ombudsman. This is further supported by our Head of Customer Services who is the 'complaints officer' and assumes responsibility for the team and updating the governing body and also the MRC (Member Responsible for Complaints). Alongside this, our Director of Resident Services, has overall accountability.

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	Internal escalation process – available on request	All Complaints Officers have access to staff at all levels to facilitate the prompt resolution of complaints. We have a clearly defined internal escalation process to support facilitating the investigation of all complaints, which includes Heads of Service, Executive Directors, and our Chief Executive. Each officer has a delegated authority to resolve complaints and offer compensation, to further support resolving disputes promptly and fairly.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	N/A	We prioritise complaint handling at Origin. To support fostering a culture of learning from complaints, we conduct quarterly 'Learning from Complaints Sessions'. We also share these learnings with our MRC (Member Responsible for Complaints) and report on complaint themes and learning to Board . All complaint handling

				colleagues received regular training and review and take learnings from all determinations received from the Housing Ombudsman. All staff who handle complaints have completed the HOS 'Dispute Resolution Module' and are subscribed to the HOS Learning Hub. We have a dedicated Customer Relations Team, who are assigned the responsibility for complaint handling. The management of this team is led by a Customer Relations and Quality Assurance Manager, who oversees the activity of the Team
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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	Yes	Complaints policy – Kate to add link when approved and uploaded	See complaints policy.

	Code. Residents must not be treated differently if they complain.			
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 – Kate to add link when approved and uploaded	Our complaints policy sets out our 2 stage complaints policy, in line with the requirements of the Code. See section 4.11
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	Yes	Complaints policy – Kate to add link when approved and uploaded	Our complaints policy sets out our 2 stage complaints process, in line with the requirements of the Code. See section 4.11

	delay access to the Ombudsman.			
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	Complaints policy – Kate to add link when approved and uploaded	Our complaints policy sets out our 2 stage complaints process, in line with the requirements of the Code – See section 4.11
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We do not delegate the handling of complaints	We do not delegate the handling of complaints

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	Complaints policy – Kate to add link when approved and uploaded	When a complaint is logged at Stage 1 or escalated to Stage 2, we set out our understanding of the complaint and the outcomes the customer is seeking. At the start of a stage 1 (or 2) complaint investigation, we will contact the customer via their channel of choice, to gain an understanding of the issues and the outcomes the customer is seeking. We call this the “complaint definition” and will complete a form of ‘initial contact’ and add to the case. If any aspect of the complaint is unclear, the customer is asked for clarification and the full definition agreed between both us and the customer.
5.7	When a complaint is acknowledged at either stage, landlords must be	Yes	N/A	We address this using our ‘Initial contact’ approach. In this contact with customers

	clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.			at the start of a stage 1 or stage 2 compliant investigation we agree with the customer the “complaint definition”. This enables us to have a clear understanding and agreement with the customer about the full complaint investigation.
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	Yes	N/A	Complaints are allocated and overseen by the Customer Relations and Quality Assurance Manager. If there is any potential conflict, for example investigating a complaint about the conduct of a staff member, this will be investigated by a line manager, independent from the colleague being complained about. Where any conflict of interest is highlighted, this will be addressed and managed by our Head of Customer Services and/ or

	of interest; and d. consider all relevant information and evidence carefully.			Executive Director, to remove and manage the conflict of interest. How we handle sensitive complaints is covered in section 6.0 of our Complaints Policy. We continue to take a pragmatic approach in this respect and outline our approach in our policy. The complaint handlers regularly receive training, feedback, coaching and attend professional training courses. This is further supported by regular training.
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	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages)

	informed about their complaint.			
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	Complaints policy – Kate to add link when approved and uploaded https://www.originhousing.org.uk/media/2i3plunn/reasonable-adjustments-policy.pdf	This code section and requirement is set out in our current Complaints Policy at section 4.9 (Making a complaint) and section 10 (Equality) All colleagues have the ability to enable the recording of any disabilities or additional needs on our (Customer Relationship management System) CRM. Any reasonable adjustments are kept under active review
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.3, 4.7 and 4.8 (Exclusions)

	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.			Action arising from this self assessment: We have amended our Complaints Policy so that complaints involving dissatisfaction with the level of compensation at stage 1 will be handled within the complaints process and addressed at Stage 2.
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	N/A	We have specific mandatory fields on our CRM system (where we record all complaints). This enables us to ensure we effectively keep full records of: - The complaint - Outcomes at each stage - Original complaint - Date received We adopt a best practice approach which enables us to record the following onto the timelines of all complaints: all correspondence with the customer -

				correspondence with other parties - and any relevant supporting documentation such as reports or surveys.
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	N/A	All Complaints Officers have access to staff at all levels to facilitate the prompt resolution of complaints. We have a clearly defined internal escalation process to support facilitating the investigation of all complaints, which includes Head of Service, Executive Directors, and our Chief Executive. Connected to compensation, each officer has a delegated authority to resolve complaints concerning compensation, to further support resolving disputes promptly and fairly.

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	Link to Managing Customer Communications Policy	Our Managing Customer Communications policy sets out our approach.
Oach. 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	Complaints policy – Kate to add link when approved and uploaded for review as above	Our Complaints Policy and Managing Customer Communications policy sets out the approach and due regard is had for equalities implications of any restrictions.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	N/A	All complaints are triaged at the point of being logged and acknowledged. We have a dedicated Complaints Support Officer who supports and fulfils this role. This helps to identify those complaints which can be responded to as early as possible. Through this same process, if any customer is vulnerable or at risk – this enables us to prioritise the issue or complaint.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): Our aim, and in line with this policy, is to it acknowledge and log a formal complaint at stage one of our complaints procedure, and within five working days of receipt.

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): A full written response to the complaint will be sent out as soon as possible and in any event within 10 working days. We report on performance against this monthly to our Executive Team and also to our Board Management Committee.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – Stage 1): <i>On occasions, it may be necessary to extend the date for a full response by up to a further 10 working days to enable us to respond fully. We will not exceed this additional time estimate without good reason. Our approach is to explain this with the customer.</i>

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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – Stage 1): Where we inform a customer about any extensions to timescales, we will provide them with contact details of the Housing Ombudsman.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. We will track outstanding actions and ensure these are actioned promptly with appropriate updates provided to the customer. This applies to both stage 1 and stage 2 complaints.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	N/A	This is a standard and adopted approach to our complaint investigation.

	referencing the relevant policy, law and good practice where appropriate.			To provide further assurance on this point, the Customer Relations Manager conducts monthly quality assurance checks, where this is a specific line item, which is monitored and evaluated.
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): <i>Where customers raise additional complaints during the investigation, this will be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint</i>
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint;	Yes	Examples available on request	All these items are included in our standardised stage 1 complaint response template.

	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.			
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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 – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>If the complaint is not resolved to the customer's satisfaction at stage 1, it will be progressed to stage 2 of our complaints process. A Stage 2 complaint response is our final complaint response.</i>
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>We will accept a stage 2 within 5</i>

				<i>working days of the escalation being received, and will carry out our investigation, and provide the customer with a response</i>
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>A customer does have to explain their reasons for requesting a stage 2. We will make reasonable efforts to understand why a customer remains unhappy as part of our stage 2 response.</i>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>At stage 2, the review will be carried out by the appropriate next level manager who has not previously been involved in the complaint, usually a Head of Service or Assistant Director. This manager will not have previously been</i>

				<i>directly involved in the complaint investigation.</i>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>The allocated staff member will aim to respond to the stage 2 response as soon as possible. We will log a stage 2 within 5 working days of the escalation being received, and will carry out our investigation, and provide the customer with a response within 20 working days.</i>
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>In the very limited circumstances where it is not possible to provide a full response within 20 working days, we will contact the customer to explain this, setting out the reasons why and when they can expect to receive the response. In this</i>

				<i>circumstance, we may extend the time we have to investigate and respond to the complaint by a further 20 working days, but not without good reason, and we will clearly explain the reasons with the customer.</i>
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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages – stage 2): <i>Where we inform a customer about an extension or where agreement over an extension period cannot be reached, we will provide customers with the Housing Ombudsman’s contact details so the customer can challenge our decision.</i>
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages): <i>A complaint response will be provided to the customer when the answer to the complaint is known, not when the</i>

				<i>outstanding actions required to address the issue are completed. We will track outstanding actions and ensure these are actioned promptly with appropriate updates provided to the customer. This applies to both stage 1 and stage 2 complaints.</i>
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	Complaints policy – Kate to add link when approved and uploaded	This is a standard and adopted approach to our complaint investigation.
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	Examples available on request	All these items are included in our standardised stage 2 complaint response template.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.11 (Complaint stages). Lead complaint handlers are empowered to involve all relevant colleagues from across the business that need to input into a response or investigation.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum;	Yes	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.12 and 4.13 We revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in April 2025

	• 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	Complaints policy – Kate to add link when approved and uploaded	This code section and requirement is set out in our current Complaints Policy at section 4.12 and 4.13 (Outcomes and remedies) Any remedy offered will reflect the impact on the customer as a result of any fault or service failing identified.
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	N/A	We currently adhere to this code requirement. We also revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in April 2025
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	N/A	We revisited this item and code requirement in a training day delivered to the Customer Relations Team (who handle complaints), in April 2025

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	The annual complaints performance and service improvement report. The self-assessment against the HOS code Reports to CSC Complaints - Origin Housing	We produce an annual complaints performance and service improvement report. Our complaint handling figures are reported in our annual report and we share complaint handling satisfaction and information with our resident panel, Spotlight. Other updates are provided during the year through Resident Newsletters and website articles. Staff are updated quarterly during the Learning from Complaints workshops. The outcomes of HOS determinations and the annual HOS landlord report are shared with our Board Management Committee . This annual self-

				assessment is shared on our website.
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	The annual complaints performance and service improvement report can be found here on our website: Complaints - Origin Housing	This information is provided to the Board Management Committee on a quarterly basis and through the annual self-assessment which is then shared with the Board. We share the drivers behind complaints and our performance as part of the annual report to residents together with the areas for service improvement that we are focusing on a result of resident feedback.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	We are merging with Places for People and fully integrate from April 2026. PfP will at that stage update their self assessment.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	This code requirement is noted, and we will adhere
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	Yes	N/A	This code requirement is noted, and we will adhere

	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	N/A	We currently adhere to this code requirement. In our complaint investigations and responses we focus on actions to put things right and use the stance of “placing the customer back in the position they were in before they needed to make the complaint” Our wider approach to learning from complaints is focussed in our quarterly ‘Learning from Complaints Sessions’, where we review, through a wider lens, any opportunities to review our policies, processes and systems and dynamically review if they remain a benefit to all residents. This can take the format of: - acknowledging where things have gone wrong - providing an explanation, assistance or reasons - apologising

				- taking action if there has been a delay - reconsidering or changing a decision - amending a record - providing a financial remedy - changing policies, procedures or practices. This two option approach allows us to look beyond individual complaints, review potentially systemic issues and address them with the benefit for residents at the heart of this approach. We also share these findings with our (MRC) Member Responsible for Complaints for accountability at governance and Board level.
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	N/A	We address this specific point at our quarterly Learning from Complaints Sessions.
9.3	Accountability and transparency are also integral to a positive complaint	Yes	N/A	Our complaint handling figures are reported in our

	handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			annual report, and we share complaint handling satisfaction and information with our resident panel, Spotlight. This then informs scrutiny projects. Staff are updated quarterly during the Learning from Complaints workshops.
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	N/A	Our Director of Resident Services has overall responsibility .
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	N/A	Vicky Bonner, Chair of the Board Management Committee is the 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	Yes	N/A	Our MRC is provided with monthly complaints data and has attended our Learning from Complaints sessions to support fulfilment of this role. The

	information and staff to perform this role and report on their findings.			MRC meets with lead officers from time to time to further scrutinise performance.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, 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	N/A	Our MRC is provided with monthly complaints data and attends our Learning from Complaints sessions to support fulfilment of this role. The Board Management Committee receive reports and discuss the following: - regular updates on complaints - regular reviews of issues and trends - outcomes of all Housing Ombudsman investigations - annual complaints performance and service improvement plans
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through	Yes	N/A	We have a standard objective in relation to complaint handling for all relevant employees that reflect this code requirement, which commenced from 1 April 2024.

	complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			
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