

Housing Ombudsman Complaint Handling Code Self-Assessment

Section 1: Definition of a complaint

| Code provision | Code requirement | Comply: Yes/ No | Evidence | Commentary / explanation |
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| 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 | Policy 1.29 Dealing with Compliments, Complaints and Concerns | The policy is published on the St Anne’s Community Services website and contains a clear definition of a complaint as per 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 | Housing Team complaints training completed September 2024. Further complaints training for housing support workers and quality team Colleagues in May 2025. | Training has been completed to ensure the Housing Team identify complaints even those not raised formally as a complaint. Staff will ask residents if they want to make a formal complaint or concern when they express dissatisfaction in line with the complaints policy. |
| 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 defines the difference between a concern and complaint. Also covered in Housing Quality Delivered complaints training in May 2025. | Clear definitions and processes are outlined in the complaints policy. |

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| Code provision | Code requirement | Comply: Yes/ No | Evidence | Commentary / explanation |
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| 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 | Complaints policy: "If the concern is not resolved to the person's satisfaction, then the FLM must: • Inform the person that their concern will be treated as a formal complaint and that they will receive a letter acknowledging this" | St Anne's Community Services handles any unresolved concerns as a complaint. The Stage 1 complaints process is followed to investigate the complaint. |
| 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 | Tenants Complaints Process infographic. | If residents express dissatisfaction through survey feedback, the results will be recorded in the survey results but not as a formal complaint. Residents are reminded of the ways they can make a complaint and the processes if they wish to raise a formal complaint. |

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Section 2: Exclusions

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 and letter templates. | We follow our complaints policy which outlines the reasons why a complaint may not be accepted. Each complaint is considered separately. If a complaint is not accepted a response will be provided to the resident explaining the reason for not accepting the complaint. |
| 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 considered under the complaints policy. | Yes | <p>Complaints policy sections:</p> <ul style="list-style-type: none"> Time Limit on a Complaint Legal Action by a Person Who Has Made a Complaint Unreasonably Persistent and/or Vexatious Complaints | St Anne's Community Services Complaints policy is followed and states the circumstances where a complaint will not be accepted, or why the investigation may need to be paused due to legal proceedings. |

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Policy states time limits on making a complaint. Those within 12 months are accepted. | St Anne's Community Services does not accept complaints raised outside of the 12-month time limit. However, where there is good reason for a complaint being raised outside of the time limit, consideration will be taken, and the complaint may be accepted. |
| 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 | Response letter templates. | Standardised response and acknowledgment letter templates are used to respond to complainants. If a complaint is not upheld, a written response would be provided with justification for not accepting the complaint. If the Housing Ombudsman responded that the complaint was upheld, the complaint would be accepted and investigated. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Housing team complaints training September 2024 and Complaints Policy. | Each complaint received is recorded with the Quality and Continuous Improvement Team and recorded on the complaints log. Each complaint is considered individually, and each circumstance is reviewed before accepting / rejecting a complaint. |

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Section 3: Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Tenants Complaints Process infographic. | A clear and accessible infographic has been created, with the support of the Resident Forum, outlining the steps to make a complaint. The leaflet has been provided to all residents. Support Workers have regular contact with residents and support individuals to make a complaint. St Anne's staff have completed Equality & Diversity training. |
| 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 | Policy and training | St Anne's Community Services complaints policy is organisation wide. The Housing team have also completed complaints handling training in September 2024 to ensure all complaints are identified and reported accordingly. |
| 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 | The number of complaints received is monitored and reported to Committee and Board with the lessons learnt. | St Anne's Community Services recognises the value of complaints and welcomes complaints as an opportunity to improve and better our services. |

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | How to make a complaint infographic and Easy Read version of the policy available. | <p>St Anne's Community Services has produced a leaflet with the clear steps for how residents can make a complaint.</p> <p>The Complaints policy is available on the external website. The policy is also available in an easy read format.</p> |
| 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 | <p>The Complaints policy is published on the website.</p> <p>Tenants Complaints Process infographic</p> | <p>The complaints process infographic was shared to all residents in October 2024 with the annual report. The infographic contains the contact details for the Housing Ombudsman.</p> <p>The Resident Forum co-produced the infographic, and the group review recent complaints at every meeting.</p> <p>The complaints policy can be publicly accessed on the St Anne's website and refers to the Housing Ombudsman's role as the external regulator.</p> <p>Support Workers are familiar with the complaints</p> |

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| | | | | process and provide support to residents who want to raise a complaint. |
| 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 | Housing team complaints training September 2024. | St Anne's acknowledges that residents may wish to have a representative deal with their complaint on their behalf and in agreement with the resident would liaise with the representative. |
| 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 | Tenants Complaints Process infographic | All residents have received the leaflet which includes the details of the Housing Ombudsman website and phone number. |

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Section 4: Complaint Handling Staff

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Complaints Policy explains the role of the Quality & Continuous Improvement Team in complaints handling. | The Quality & Continuous Improvement (QOCI) Team receive notification of all complaints, the QOCI Team then notify the relevant department and manager to conduct the investigation. |
| 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 | Policy section "The Complaints Process" | The QOCI Team will receive notice of all complaints and delegate to the appropriate Manager to lead the investigation. The QOCI team has access to staff at all levels within St Annes, the Area Manager for Housing investigates housing complaints and has the authority to resolve disputes 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 | The Housing Team has completed Complaints Handling training in September 2024. This training was broadened to housing support workers and quality team colleagues in May 2025. | The Housing Team and trained to identify a complaint. Complaints are welcomed as an opportunity to improve. |

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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 | Policy 1.29 Dealing with Compliments, Complaints and Concerns. | St Anne's Community Services only has one complaints policy. Complaints are handled professionally; all residents are treated equally. |
| 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 | <p>Complaints Policy: "Concerns - Some people may not want to make a formal complaint, but they may have concerns that require action to be taken.</p> <p>It is important that concerns are listened to at a local level and the person understands that they are being listened to and taken seriously. The aim is to arrive quickly and fairly at a satisfactory resolution."</p> | <p>St Anne's Community Service's acknowledges that some issues may be raised as a concern instead of a complaint and can be resolved quickly before a complaint needs to be raised.</p> <p>If a complaint is raised there are only two stages in the process.</p> |
| 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 | <p>Stage 1 – initial investigation.</p> <p>Stage 2 – process to appeal the investigation to the Director of Housing.</p> | Stages 1 and 2 are clearly outlined within the complaints policy. Following stage 2, the complainant can appeal to the Housing Ombudsman. |

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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. | N/A | N/A | All complaints are handled internally by St Anne's Community Services. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | N/A | N/A | All complaints are handled internally by St Anne's Community Services. |
| 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 | Stage 1 and Stage 2 acknowledgement and response letter templates. | The standardised letter template includes our understanding of the complaint and the outcome the complainant is seeking. A link to the published complaints policy is included in the letter which refers to the Housing Ombudsman's definition of complaint. |
| 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 | Stage 1 and Stage 2 acknowledgement letter templates. | The response letters will clearly identify if any aspect of the complaint was not the responsibility of St Anne's. |

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| 5.8 | <p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. | Yes | <p>Complaints process and policy.</p> <p>Housing team complaints training September 2024.</p> | <p>Every complaint is handled in line with our complaints policy, which follows the Housing Ombudsman code for complaint handling.</p> <p>A fair approach is taken to consider each complaint independently and the complainant's point of view is listened to establish details of the issue. If needed, an external independent investigator will be used to ensure a fair process. The investigation will collect all relevant information to make an informed conclusion.</p> |
| 5.9 | <p>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.</p> | Yes | <p>Complaints Policy "Holding Response in More Complex Situations"</p> | <p>If an investigation exceeds the agreed timelines, a letter will be sent explaining the reason for the extension and a revised timeline. The resident will be offered to meet to discuss the progress so far.</p> |

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| 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 | Resident records and Support Workers. | <p>All staff have completed Equality and Diversity training. St Anne's Community Services uses software to record tenant information, within this there are options to add notes regarding reasonable adjustments.</p> <p>Contractors are made aware of any adjustments to ensure resident's needs are met. For example, if a resident required printed documents in a larger print or different language.</p> <p>Resident needs are reviewed often to ensure appropriate adjustments are in place.</p> |
| 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 | Stage 1 and Stage 2 process outlined in the complaints policy. | The complaints process is followed, and residents are provided with information of how to escalate a complaint to stage 2 and the Housing Ombudsman. |
| 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 | Yes | Complaints tracker | The Quality & Continuous Improvement team record all complaints and have a tracker which is updated |

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| | correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | | | <p>throughout the complaints process.</p> <p>The Housing Team also record housing complaints and the outcomes.</p> <p>The Area Manager for Housing 'owns' the complaints process for housing related complaints.</p> |
| 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 Policy | <p>St Anne's Community Services agreed approach to handling a complaint or concern is to resolve the issue as soon as possible.</p> <p>All efforts will be made to resolve the issue without need to escalate the complaints process.</p> |
| 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 | Tennant contracts. Anti-social Behaviour Policy. | <p>Expectations of resident's behaviour can be found in the tenant contract. Support plans are regularly reviewed by Support Workers and if restrictions were required this would be noted on the resident's profile.</p> |
| 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 | Resident records, support plans, Tenant agreements. | <p>St Anne's Community Services complies with the Equality Act 2010 and if required restrictions on contact would be in accordance with equality regulations.</p> |

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Section 6: Complaints Stages

Stage 1

| Code provision | Code requirement | Comply : Yes / No | Evidence | Commentary / explanation |
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| 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 Policy – Stage 1. Acknowledgement letter considers the complexity of the complaint the investigation required. | Stage 1 complaints will be aimed to be resolved before the 10-working day deadline. All efforts will be made to promptly resolve the issue without delay. |
| 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 | Policy section - Timeframes Response in Most Situations | “Acknowledgement letter will be sent within 3 working days, this will include details of the person appointed to conduct the investigation” |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged. | Yes | Policy section - Timeframes Response in Most Situations | “Within 10 working days of the complaint being received, a formal report will be completed by the appointed investigator.” |
| 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 | Yes | Complaint policy section: 'Holding Response in More Complex Situations' “An explanation of why the investigation is taking more than | If the investigation can not be concluded within 10 working days for complex complaints, a holding letter will be provided with an update to the complainant. |

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| | 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | | 10 days. A realistic revised timescale not exceeding a further 10 days by which it is expected to have completed the investigation fully." | |
| 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 | Holding letter template for investigation extension. | The letter informing a resident of the extension contains the contact details for 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 | Housing team complaints training, completed September 2024. | We acknowledge that some actions will be completed quicker than others, therefore the resident will be updated when actions have been completed and will not be made to wait until all actions are achieved. This ensures the resident knows what steps have been taken and is not left without any updates. |
| 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 | Letter template 'Stage 1 Investigation - response to your complaint' | Our response letters clearly address all aspects of the complaint. Each finding and conclusion from the investigation is listed with reference to relevant policies, procedures or legislation. |

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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 | Stage 1 response letter templates – bullet points of what the complaint is. | <p>Additional complaints raised in the Stage 1 process will be added to the original complaint, these are detail in a list the response letters.</p> <p>If an additional Stage 1 complaint is raised after the complaint is closed a new complaint will be recorded and handled separately.</p> |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol style="list-style-type: none"> 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 | Stage 1 response letter template. | <p>Our response letter template clearly states:</p> <ul style="list-style-type: none"> The stage of the complaint Details of the complaint and the resident's desired outcome Details of the investigation and findings Apologies and explanations of actions and any compensation. Lessons learnt and actions to be put in place. How to escalate to stage 2 and contact the Housing Ombudsman. |

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Stage 2

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Our complaints policy outlines the complainant's right to appeal the stage 1 outcome and progress to stage 2. This is also documented in the stage 1 response letter. |
| 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 | Policy section 'Stage 2 - Appeals Investigation by the Chief Executive or Director of Housing and Estates' | "Acknowledge the escalated complaint within three working days of receipt" |
| 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: "Stage 2 - Appeals Investigation by the Chief Executive or Director of Housing and Estates" | Stage 2 complaints are handled by the Director of Housing and Estates or the CEO. If required, a further investigation will be commissioned to understand why the resident remains dissatisfied. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | "If the stage 2 appeal relates to housing complaint, the Director of Housing and Estates will respond" | The Director of Housing and Estates will not investigate Stage 1 complaints, only Stage 2 complaints. The Area Manager for Housing leads on Stage 1 housing complaints. |

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| 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 "Make a formal response within 20 working days." | We adhere to our complaints policy and the timelines specified in the policy. |
| 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 | "Any additional time will only be justified if related to convening a panel. The investigation should not take longer than 3 months, where possible." | Any extension will be communicated to the complainant. |
| 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 | Holding letter template for investigation extension. | The letter informing a resident of the extension contains the contact details for the Housing Ombudsman. |
| 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 | Housing team complaints training, completed September 2024. | We acknowledged that some actions will be completed quicker than others, therefore the resident will be updated when actions have been completed and not wait until all actions are achieved. This is to ensure the resident know what steps have been taken and is not left without any updates. |

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| 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 | Letter template 'Stage 2 Investigation - response to your complaint' | Our response letters clearly address all aspects of the complaint. Each finding and conclusion from the investigation is listed with reference to relevant policies, procedures or legislation). |
| 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 | Stage 2 response letter template | Our response letter template clearly states: <ul style="list-style-type: none"> • The stage of the complaint. • Details of the complaint and the resident's desired outcome. • Details of the investigation and findings. • Apologies and explanations of actions and any compensation. • Lessons learnt and actions to be put in place. • How to escalate to the Housing Ombudsman. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Stage 2 process | Stage 2 complaints are led by the Director of Housing and Estates or the CEO, this is St Anne's final response. |

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Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 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 | <p>4.47 Residents' Compensation Policy</p> <p>Response letter templates</p> | <p>Our response letters at Stage 1 and Stage 2 include:</p> <ul style="list-style-type: none"> • An apology and explanations where things went wrong. • Details of the actions we have taken. • Where appropriate the details of financial compensation. • The lessons that we have learnt from the investigation and what we will put in place to prevent future issues. <p>We track the lessons learnt and the improvements we have made as a result of the complaints.</p> |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | 4.47 Residents' Compensation Policy | We follow our Resident Compensation policy to ensure compensation provided is proportionate and fair to the impact on the resident. |

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| 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 | Response letter templates | Stage 1 and Stage 2 final response letters outline any remedy or compensation which will be awarded. Timelines of completing the actions will be provided and the resident will be updated with the progress. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Housing Ombudsman | <p>The complaints officers and MRC receive and reflect on regular updates from the Housing Ombudsman which provide guidance on findings and actions from complaints investigations.</p> <p>We have identified we need to strengthen the learning opportunities from this guidance and report to the wider Housing team.</p> |

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Section 8: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 Ombudsman in relation to the work of the landlord. | Yes | <p>Presented at Board on 11th February 2025.</p> <p>Review of 2024/25 complaints performance submitted to Board in July 2025 and will be published on website in August 2025.</p> | <p>The Annual Housing Complaints Performance and Service Improvement Report 23-24 was presented to the Board of Trustees for scrutiny in February 2025. This holds St Anne's accountable for our performance.</p> <p>The report includes data on complaints received and the handling performance. Updates on lessons learnt and actions taken by the organisation are also reported. The self-assessment against the Housing Ombudsman's code is also presented.</p> <p>Update – presented at Board on 11.02.2025. Published on the website and submitted to the regulator on 12.02.2025.</p> |

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| 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 | Following July 2025 Board meeting the refreshed version of this self-assessment will be published on the website. | The self-assessment will be available on St Anne's website. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Housing & Estates restructure 2024 | <p>This self-assessment follows the significant structure of the Housing & Estates Team. The restructure recruited an Area Manager for Housing and a Head of Property in January 2025.</p> <p>The restructure has provided collaboration between Governance and Housing to provide greater assurance of our regulatory compliance.</p> |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | | St Anne's Community Service will comply with any request from the Housing Ombudsman. |
| 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 | Yes | | In the case of exceptional circumstances, the appropriate continuity plan would be followed. The |

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| | 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. | | | Housing Ombudsman would be informed, and any affected residents would be notified. |
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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 | Housing Team Complaints training September 2024. | Lessons learnt form complaints are regularly reviewed and reported to Committee and Board. Trends are identified and improvements put in place to make improvements for all residents. |
| 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 culture. | St Anne's Community Services recognises the value of complaints and welcomes complaints as an opportunity to improve and better our services. The Housing team have completed complaints handling training to ensure complaints are recorded and to improve services for residents. |

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| 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 | Reports to Committee, Board, and Residents Forum. | <p>The Resident Forum meets every 3 months and trends of complaints are reported to the group.</p> <p>St Anne's acknowledges the importance of being accountable for making improvements. The Resident Forum welcomes feedback from Residents to help improve St Anne's service.</p> <p>We also have a Resident Representative on our Board of Trustees to ensure that the Resident voice is heard at all levels.</p> |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | Yes | Complaints Policy | <p>Stage 1 complaints are handled by the Area Manager for Housing; Stage 2 housing complaints are handled by the Director of Housing & Estates.</p> <p>Complaints trends are regularly reviewed to identify areas for improvement in St Anne's policies and processes. Any risks arising from complaints are identified</p> |

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| | | | | and managed accordingly, significant risks are reported to the Audit and Risk Committee. |
| 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 | Appointed December 2024 | In December 2024, we appointed a Trustee as our Member Responsible for Complaints, the MRC has contributed to the annual complaints review and improvement report. |
| 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 | MRC has housing expertise and is Managing Director of a Housing Association. | The MRC was appointed on merit of their expertise and knowledge of the housing sector. We are assured that the MRC has access to the relevant information and insight to report on complaints handling. The MRC is familiar with the governing bodies. |
| 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; | Yes | Updates provided quarterly to Board and Committees. | The Director for Housing & Estates reports to the MRC and Trustees every 3 months about the trends and volume of complaints, complaints handling performance, lessons learnt and any updates on any Housing Ombudsman's investigation. |

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| | <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> | | | <p>The Resident Forum are regularly updated on the volume of complaints and trends.</p> |
| 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> <p>a. have a collaborative and co-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> | Yes | <p>Housing Team training September 2024.</p> | <p>The team are compliant with complaints handling training and will continue to have regular refresher training to ensure that complaints are handled effectively.</p> <p>The Housing team meets monthly to review complaints and lessons learnt and will look in depth into trends and outcomes every three months. The Complaints policy applies to the whole organisations and clearly sets out St Anne's approach and positive culture to complaint handling.</p> |