

## Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

### Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as:  <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	The Housing Ombudsman’s definition of a complaint has been incorporated within Onwards Complaint Resolution policy and is embedded within our operational and complaint handling procedures.  Onward also accept complaints from non-residents.
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	Our contact handling procedures are designed to ensure that enquiries are triaged in a manner which determines whether they constitute a service request or complaint.

			<p>Customer facing colleagues complete an e-learning module which includes information about the Housing Ombudsman's Service, the Code and our obligations in maintaining a compliant service, as well as highlighting the benefits for customers, colleagues and the wider sector.</p> <p>All complaints, however received, are handled consistently and in line with our Complaint Resolution policy.</p>
<b>1.4</b>	<p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy.</p> <p>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.</p>	Yes	<p>The Complaint Resolution policy outlines (with examples) the difference between a complaint and a service request. These principles are embedded within our internal complaint handling procedures.</p> <p>Guidance on how to differentiate service requests and complaints has been issued to colleagues.</p>
<b>1.5</b>	<p>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.</p>	Yes	<p>We always attempt to resolve enquiries and chasers pertaining to service requests at the first point of contact and until fully resolved.</p> <p>Colleagues utilise the flow charts included in 'Appendix A' of the Complaint Handling Code to determine whether an enquiry constitutes a service request or complaint</p>

			<p>and will take the appropriate action based upon their assessment.</p> <p>Should it be determined that a complaint must be logged, the details of the complaint are recorded in the housing management system.</p>
<b>1.6</b>	<p>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.</p>	Yes	<p>Our Service Recovery team proactively contact a selection of residents who express dissatisfaction via our satisfaction surveys. This process involves further information gathering, triaging of the residents' concerns and, where possible, the implementation of appropriate resolutions.</p> <p>If a resolution cannot be achieved, the Complaint Resolution process is signposted.</p>
<b>2.1</b>	<p>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.</p>	Yes	<p>Our Complaint Resolution policy sets out examples of what may and may not be considered a complaint.</p> <p>We have included example scenarios within the Complaint Resolution policy to help residents determine the difference between a service request and a complaint.</p> <p>A detailed explanation outlining why a complaint has not been accepted is</p>

			<p>always provided to the complainant. The explanation is issued in writing and in line with our Complaint Resolution policy.</p> <p>All complaint correspondence includes details of how residents can refer their complaint to the Housing Ombudsman Service.</p> <p>Complaints which are submitted but not accepted are recorded, tracked, and included in our management information. The insight gathered is reviewed as part of our continuous learning and improvement activity.</p>
<p><b>2.2</b></p>	<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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	<p>Yes</p>	<p>Exclusions are detailed within the Complaint Resolution policy.</p> <p>Exclusions are driven by factual circumstances, thus preventing inconsistency and/or subjectivity in the event of a complaint being refused. This ensures maximum fairness and consistency for residents.</p> <p>We continually review the Complaint Resolution policy to ensure that all elements of the policy are clear, concise, and easy for residents to understand. This includes the section regarding policy exclusions.</p>

			The policy makes it clear that all complaints received will be assessed based upon their individual merits.
<b>2.3</b>	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	Our Complaint Resolution policy states that in exceptional circumstances, we may accept a complaint outside of the 12-month timescale.
<b>2.4</b>	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	A detailed explanation outlining why a complaint has not been accepted is always provided to the complainant. The explanation is issued in writing and in line with our Complaint Resolution policy.  All complaint correspondence includes details of how residents can refer their complaint to the Housing Ombudsman Service.
<b>2.5</b>	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	The Complaint Resolution policy makes it clear that all complaints received will be assessed based upon their individual merits.

### Section 3 - Accessibility and awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Our website contains a dedicated <a href="#">compliments and complaints homepage</a> which details the channels through which complaints may be submitted.</p> <p>Details are also included within the Complaint Resolution policy.</p> <p>We have a Reasonable Adjustments statement of approach and a Vulnerable Customer policy, both of which ensure that we are providing services in line with the Equality Act.</p>
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	<p>The Complaint Resolution policy sets out the various ways in which a complaint may be submitted.</p> <p>All colleagues are trained to help identify and understand complaints and are aware of how to raise a complaint via our internal processes.</p>

<p><b>3.3</b></p>	<p>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.</p>	<p>Yes</p>	<p>Our approach is to minimise the number customer complaints and resolve enquiries at the first point of contact.</p> <p>We have a well embedded complaint handling culture which recognises how receiving complaints can benefit our learning and improvement activities. When we do receive complaints, we receive them in a positive manner.</p>
<p><b>3.4</b></p>	<p>Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.</p>	<p>Yes</p>	<p>The Complaint Resolution policy is available via our website under the 'policies' and the 'contact us' sections. It may also be accessed via the dedicated compliments and complaints homepage.</p> <p>The policy explains all aspects of the process in a clear, concise, and customer friendly manner.</p> <p>To improve accessibility to our complaint handling services, we have published an 'easy read guide'. This is a simplified version of the policy which aims to provide residents with the policy information in a more customer friendly format which some residents may find easier to read and digest.</p> <p>The policy also includes multi-lingual instructions detailing how residents can obtain a copy of the policy in an alternative language.</p>

<p><b>3.5</b></p>	<p>The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.</p>	<p>Yes</p>	<p>We ensure that our complaint handling policy and process are accessible to all. We regularly share information about our complaints service via our customer newsletters, annual reports, and other correspondence. This includes information regarding the Housing Ombudsman service.</p>
<p><b>3.6</b></p>	<p>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.</p>	<p>Yes</p>	<p>Residents may nominate a representative to deal with the complaint on their behalf. By way of example, we have a dedicated mailbox <a href="mailto:mp-enquiries@onward.co.uk">mp-enquiries@onward.co.uk</a> which is used by MP's and Councillors to submit enquiries and complaints whilst acting on behalf of their constituents.</p> <p>All complaints however received are dealt with in line with the Complaint Resolution policy.</p>
<p><b>3.7</b></p>	<p>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.</p>		<p>Information pertaining to a resident's right to complain is publicised in a variety of ways such as in our <a href="#">Annual Customer Report</a>, <a href="#">Annual Complaints Review</a>, and in our Customer Newsletters.</p> <p>The Housing Ombudsman Service and contact details are published on our compliments and complaints homepage.</p>



## Section 4 - Complaint handling personnel

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The Customer Resolution team has responsibility for complaint handling and is led by the Customer Resolutions manager. The Customer Resolution manager is our nominated "complaints officer" and is the key point of liaison with the Ombudsman.
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	<p>The Complaint Resolution manager leads a dedicated team of Resolution Specialists.</p> <p>Working as the customer advocate, the Customer Resolution team works with, but also independently of other teams and are tasked with delivering customer focussed outcomes in response to complaints.</p> <p>The team manages the relationship with complainants, coordinates complaint investigations and case manages complaints through to resolution.</p> <p>The team are responsible for the final decision on whether complaints should be upheld or not and they have the autonomy to agree appropriate resolutions/actions.</p>

			The team may agree other remedies with complainants such as compensation and financial goodwill payments.
<b>4.3</b>	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	<p>We have a well embedded complaint handling culture which recognises how receiving complaints can benefit our learning and improvement activities.</p> <p>All colleagues have attended training to help recognise and deal with complaints. Colleagues directly involved with the investigation and resolution of complaints receive full training and are competent in our complaint handling procedures.</p> <p>Each business area has clearly defined roles and responsibilities in relation to complaint handling and is adequately resourced to ensure effective delivery of the complaint handling service.</p>

## Section 5 – The Complaint Handling Process

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>5.1</b>	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	The Complaint Resolution policy is the only policy in place for dealing with complaints. The policy is supplemented by an 'easy read' guide and guidance

			<p>covering Remedies and Financial Redress.</p> <p>We have a well embedded complaint handling culture which recognises how receiving complaints can benefit our learning and improvement activities. When we do receive complaints, we receive them in a positive manner.</p>
<b>5.2</b>	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>We always attempt to resolve a resident's concerns at the first point of contact. Colleagues take great care to ensure that residents are aware of their right to have their concerns investigated as a complaint at any point.</p> <p>Our complaint resolution process is a two-stage process and we do not operate any extra named or informal steps.</p>
<b>5.3</b>	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	Our complaint resolution process is a two-stage process and we do not operate any extra named or informal steps.
<b>5.4</b>	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	<p>Complaints are handled by our Customer Resolution team and not by third parties.</p> <p>Our complaint resolution process is a two-stage process and we do not operate any extra named or informal steps.</p>

<b>5.5</b>	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints are handled by our Customer Resolution team and not by third parties.
<b>5.6</b>	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	<p>Upon receipt of a complaint our case handlers contact complainants to acknowledge receipt of the complaint, formally introduce themselves, establish a relationship and explain their role.</p> <p>During this initial phase of the complaints process the case handler will aim to clarify the grounds for complaint, gather further information required to aid the investigation and agree the complainants desired outcome.</p> <p>The next steps and contact regime will also be agreed.</p>
<b>5.7</b>	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	Informing complainants which aspects of the complaint we are, and are not, responsible for, takes place during the introductory acknowledgement process. This includes providing confirmation in writing.
<b>5.8</b>	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> </ul>	Yes	Working as the customer advocate, the Customer Resolution team works independently and impartially and are tasked with delivering customer focussed resolutions to complaints.

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>		<p>Our introductory acknowledgement and internal investigation procedures provide all parties with the opportunity to set out their position and/or submit evidence.</p> <p>Operating independently from other teams enables our Customer Resolution team to always remain open-minded, impartial and free of any potential conflict of interest.</p> <p>Using their knowledge, experience, established procedures and system controls, our complaint handlers gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a balanced and consistent approach to case investigations and resolutions.</p>
<b>5.9</b>	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	If it is likely that a complaint may not be resolved within the timescales outlined in the Complaint Resolution policy, our case handlers will inform the resident as soon as they become aware of any likely delay.
<b>5.10</b>	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	We have a Reasonable Adjustments statement of approach and a Vulnerable Customer policy, both of which ensure that we are providing services in line with the Equality Act.

<p><b>5.11</b></p>	<p>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.</p>	<p>Yes</p>	<p>We would not generally refuse to escalate a complaint unless it was deemed that the complaint was vexatious or covered by the exclusions detailed within the Complaint Resolution policy.</p> <p>In the event that a decision was made not to escalate a complaint to the next stage, the decision for doing so would be provided to the complainant in writing and in accordance with our complaint handling procedures.</p>
<p><b>5.12</b></p>	<p>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.</p>	<p>Yes</p>	<p>All information, correspondence and evidence pertaining to complaints is stored within our housing management system.</p>
<p><b>5.13</b></p>	<p>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.</p>	<p>Yes</p>	<p>We always attempt to resolve a resident's concerns at the earliest opportunity. Our Customer Resolutions team are empowered to resolve complaints and determine the appropriate remedy without the need for escalation.</p>
<p><b>5.14</b></p>	<p>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.</p>	<p>Yes</p>	<p>Onward has both an Unreasonable Behaviour policy and a Violence and Aggression policy.</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	The Unreasonable Behaviour policy and violence and aggression policy ensure proportionality and compliance with the Equality Act 2010.
------	--	-----	--

## Section 6 - Complaint stages

### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>We always attempt to resolve a complainant concern at the earliest opportunity. Our Customer Resolutions team are empowered to resolve complaints and determine the appropriate remedy.</p> <p>Using their knowledge, experience and established procedures, our Customer Resolutions team gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a prompt, balanced and consistent approach to complaint handling.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.	Yes	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what

			action we will take in the event that the timescale may not be achieved.
<b>6.3</b>	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take in the event that the timescale may not be achieved.
<b>6.4</b>	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	If it is likely that a complaint may not be resolved within the timescales outlined in the Complaint Resolution policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant.
<b>6.5</b>	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	All complaint correspondence includes details of how complainants can refer their complaint to the Housing Ombudsman Service.
<b>6.6</b>	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	Resolutions are determined and responses issued when the answer to the complaint is known.  Prior to issuing a complaint response our case handlers contact the complainant to discuss their findings, communicate the outcome and agree any intended action and/or remedy. The case handler will also confirm that the complainant is satisfied with the outcome and the way in



			<p>which the complaint has been handled prior to issuing the response.</p> <p>The case is not closed until which time all outstanding actions have been completed and where possible, a pre-closure call has taken place.</p>
<b>6.7</b>	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	<p>Using their knowledge, experience and established procedures, our Customer Resolutions team gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a prompt, balanced and consistent approach to complaint handling.</p> <p>Case handlers utilise a repository of template email/letter responses to ensure that all information pertinent to a complaint is considered, and any written correspondence is structured in a consistent and customer friendly manner.</p> <p>A selection of resolved complaints are checked against our quality management framework to ensure that they meet the required quality standard.</p>
<b>6.8</b>	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	Yes	New/additional information or evidence may be submitted at any point during the process.

	<p>investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.</p>		<p>The use of dedicated case handlers and robust communication methods ensures that any new information can be easily shared, reviewed, and considered as part of an open complaint.</p> <p>In the event that a new complaint needs to be logged, the complainant is informed, and the acknowledgement process followed at Stage 1 initiated.</p>
<p><b>6.9</b></p>	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	<p>Yes</p>	<p>The Customer Resolution team are trained and competent in the delivery of all these principles.</p> <p>Our quality management framework ensures that the principles are applied correctly and consistently.</p> <p>A complainants right to escalate their complaint is included in all complaint correspondence.</p>

## Stage 2

<b>6.10</b>	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	The Complaint Resolution policy and our Stage 1 response correspondence promotes the complainants right to escalate their complaint and outlines the escalation procedure.  All complaint correspondence includes information pertaining to the Housing Ombudsman Service and their contact details.
<b>6.11</b>	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaint response timescales are detailed within the Complaint Resolution policy.
<b>6.12</b>	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	Whilst every attempt will be made to understand the complainants request to escalate their complaint, a personalised acknowledgement procedure forms a fundamental part of the resolution process and ensures that all aspects of the complaint are understood correctly including the complainants desired outcome.  We will therefore continue to maintain engagement with the customer throughout the resolution process.

<b>6.13</b>	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Complaint Resolution policy states that Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1.
<b>6.14</b>	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint response timescales are detailed within the Complaint Resolution policy.
<b>6.15</b>	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	If it is likely that a complaint may not be resolved within the timescales outlined in the Complaint Resolution policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the resident.
<b>6.16</b>	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	All complaint correspondence includes information pertaining to the Housing Ombudsman Service and their contact details.
<b>6.17</b>	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	Resolutions are determined and responses issued when the answer to the complaint is known.  Prior to issuing a complaint response our case handlers contact complainants to discuss their findings, communicate the outcome and agree any intended action and/or remedy. The case handler will also confirm that the complainant is satisfied with the outcome and the way in

			<p>which the complaint has been handled prior to issuing the response.</p> <p>The case is not closed until which time all outstanding actions have been completed and a pre-closure call has taken place.</p>
<b>6.18</b>	<p>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.</p>	Yes	<p>Using their knowledge, experience and established procedures, our Customer Resolutions team gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a prompt, balanced and consistent approach to complaint handling.</p> <p>Case handlers utilise a repository of template email/letter responses to ensure that all information pertinent to a complaint is considered, and any written correspondence is structured in a consistent and customer friendly manner.</p> <p>A selection of resolved complaints are checked against our quality management framework to ensure that they meet the required quality standard.</p>
<b>6.19</b>	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <p>a. the complaint stage; b. the complaint definition;</p>	Yes	<p>Colleagues are trained and competent in the delivery of all these principles.</p>

	<p>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.</p>		<p>Our quality management framework ensures that the principles are applied correctly and consistently.</p> <p>A complainants right to escalate their complaint is included in all complaint correspondence.</p>
<b>6.20</b>	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Onward operates a two-stage complaints process.</p> <p>Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1.</p>

## Section 7: Putting things right

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>7.1</b>	<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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Resolution outcomes are agreed with complainants prior to a complaint case being resolved and our written responses provide a full explanation detailing what has gone wrong, and the action taken to put things right.</p> <p>Learning outcomes specific to the complaint are incorporated within the complaint response and are used to inform our learning and continuous improvement activities.</p>

			<p>We operate on the principle of where we can and where it's appropriate, we resolve issues first time. We have done specific training we call Onward+ delivered to the whole organisation looking at this and seeing how we make this work from the customers' perspective.</p> <p>In May 2023 we established a Customer Resolution Working Group, and this Group has an organisational wide remit to improve customer resolutions.</p>
<b>7.2</b>	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our approach to remedies and financial redress is detailed in our <a href="#">Remedies and Financial Redress Guidance</a> .
<b>7.3</b>	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	Resolution outcomes are agreed with complainants prior to a complaint case being resolved and our written responses provide a full explanation detailing what has gone wrong, and the action taken to put things right.

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our approach to remedies and financial redress aligns with the guidance issued by the Ombudsman and is detailed in our Remedies and Financial Redress Guidance.
-----	--	-----	---

### Section 8: Self-assessment, reporting and compliance

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Our annual performance and service improvement reports can be found <a href="#">here</a> .



<b>8.2</b>	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	Our annual performance and service improvement reports can be found <a href="#">here</a> .  Quarterly and annual reports are reported to the governing body.
<b>8.3</b>	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Our compliance with the Complaint Handling Code is continuously evaluated and self-assessments are carried out in line with the Complaint Handling Code.  Our audit and risk framework includes the annual self-assessment against the Code.
<b>8.4</b>	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We maintain full compliance with the Code and will promptly and positively respond to any order issued by the Ombudsman.
<b>8.5</b>	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Communication with customers and all key stakeholders forms part of our business continuity plans.

## Section 9: Scrutiny & oversight: Continuous learning and improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

<p><b>9.1</b></p>	<p>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.</p>	<p>Yes</p>	<p>Learning outcomes are incorporated within all complaint responses and are used to inform our learning and continuous improvement activities.</p> <p>The thematic issues and trends are reported to the business on a monthly basis along with recommendations for improvement.</p>
<p><b>9.2</b></p>	<p>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.</p>	<p>Yes</p>	<p>Our 'Learning into Action' framework consists of a cross-functional group of senior colleagues who meet quarterly and use insight from complaints and other mechanisms to foster a culture of learning and reflection and drive continuous improvement in our services.</p>
<p><b>9.3</b></p>	<p>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.</p>	<p>Yes</p>	<p>Our complaints performance, thematic complaint trends and continuous learning outputs are communicated to all colleagues monthly.</p> <p>Ad-hoc updates featuring information such as sector wide news and information relating to the Housing Ombudsman are also communicated to colleagues regularly.</p> <p>A variety of engagement methods are used to share our complaints information with residents such as our Annual Report, Scrutiny panels, and our Customer Complaint Forum.</p>

<b>9.4</b>	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	The Head of Customer Service Delivery is accountable.
<b>9.5</b>	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	<p>The Executive Director of Operations is the Member Responsible for Complaints.</p> <p>This role oversees the improvements on customer resolution work to ensure that culture, systems and processes are all working well and looking to improve. We also ensure that the Customer Voice is heard in our governance structure in various ways including running a Customer Committee that is a formal committee of the Board.</p>
<b>9.6</b>	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	Quarterly and annual reports are provided to the governing body. These reports include details of the volume of complaints at each stage, our performance, learning outcomes and trend analysis. Additionally, all Housing Ombudsman determinations, case detail and orders are also reported.
<b>9.7</b>	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	Quarterly and annual reports are provided to the governing body. These reports include details of the volume of complaints at each stage, our performance, learning outcomes and

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <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>trend analysis. Additionally, all Housing Ombudsman determinations, case detail and orders are also reported.</p> <p>Where cases of severe maladministration are determined, more intensive reviews are conducted, and management actions are identified and tracked.</p>
<b>9.8</b>	<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>All relevant colleagues have a standard objective in relation to complaint handling.</p> <p>Our complaint handling procedures and learning, and improvement frameworks are designed to ensure that a positive, cross-functional culture exists in relation to all aspects of complaint handling, learning and continuous improvement.</p> <p>Our approach to improving complaint resolutions and the overall customer experience involves teams from across the business. These groups work collaboratively to ensure that we are taking a professional, collective and consistent approach.</p>