



Self-assessment against the Housing Ombudsman complaint handling code 2024

The Housing Ombudsman states that:

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	Compliment Concerns and Complaints Policy	Our current complaints policy uses the HOS 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	Compliment Concerns and Complaints Policy	We have created a complaint procedure document and all relevant staff have been trained in 2024.
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	Compliment Concerns and Complaints Policy	The policy reflects this requirement. Staff training took place in 2024.

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	Compliment Concerns and Complaints Policy	The policy guidance reflects this requirement. Staff training took place in 2024.
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	Not applicable	When we carry out satisfaction surveys in the future, we will ensure it is designed in a way that makes this clear to staff.

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	Compliment Concerns and Complaints Policy	All complaints assessed in line with the complaints policy and only excluded in line with policy criteria.
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	Compliment Concerns and Complaints Policy	The Complaints policy was amended to reflect the 12-month notification period and bring clarity around when a complaint will not be considered as a complaint.

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	Compliment Concerns and Complaints Policy	The Complaints policy was amended to reflect the 12 months notification period. Covered in training.
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	Compliment Concerns and Complaints Policy Complaints register	If a complaint is not accepted, the complainant is provided a reason in writing and a record kept.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaint record keeping	The individual circumstance of each complaint is considered.

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	Compliment Concerns and Complaints Policy Accessible Information Policy Website Newsletters CCC Flyers Annual Impact Report	Complaint handling information is shared on our website, newsletters and annual report. Copies of these documents can be provided in large print if required.
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	Compliment Concerns and Complaints Policy Complaints record Staff Training Record	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaint records. Complaint quarterly reporting to Board	Complaint information, including numbers, are reported to Board and there is no complaint target to reduce the number of complaints or to disincentive complaints.
3.4	Landlords must make their complaint policy available in a clear and	Yes	Website: Sir Josiah Mason Trust - Contact Us (sjmt.org.uk)	The 2-stage process is included in the Complaints

	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.			policy and published on the website. SJMT adopts the accessible information standards and we can provide information in various languages, braille etc.
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	Compliments, Concerns & Complaints Policy	This is included in the Complaints policy.
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	Compliments, Concerns & Complaints Policy	This is specifically referenced in the Complaints Policy.
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	Compliments, Concerns & Complaints Policy In template letters	This is specifically referenced in the Complaints Policy and in complaint response letters.

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	Compliments, Concerns & Complaints Policy	This is part of the role of the CEO.
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	Compliments, Concerns & Complaints Policy	This is the responsibility of the Leadership Team who have authority to resolve promptly.
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	Compliment Concerns and Complaints Policy Complaints record Staff Training Record	Staff training. This is a standard item on staff meeting agendas to discuss lessons learned from complaints and investigations.

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 Register/Tracker	Only one Policy in place
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	Compliment Concerns and Complaints Policy	Staff trained. The Complaints policy has two stages only.
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	Compliment Concerns and Complaints Policy	The Complaints policy has two stages only.
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	Compliment Concerns and Complaints Policy	If a third party is required/appointed, they would be expected

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Compliment Concerns and Complaints Policy	All complaints are tracked and monitored by the SJMT allocated investigating officer, even when a third party is involved.
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	Compliment Concerns and Complaints Policy Template letters	Written confirmation is sent to confirm the complainants, desired resolution outcome.
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	Compliment Concerns and Complaints Policy	All complaints are acknowledged in writing and responses aim to make this clear to customers.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Compliment Concerns and Complaints Policy Staff training	All investigation officers are impartial, and cases are allocated and processed thoroughly. Case outcomes are scrutinised by Exec Team at stage 1 and Exec Team respond to complaints at stage 2

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Compliment Concerns and Complaints Policy Staff training	Holding letters are issued with clear timelines with regular residents' progress updates.
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	Support Plan Complaints Register	We record any reasonable adjustments agreed with customers and note any vulnerabilities which should be considered when dealing with a complaint. SJMT has adopted the accessible information standards and we can get provide information in various languages, braille etc
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	Compliment Concerns and Complaints Policy	We accept all appeal requests and record the reasons for the appeal. Staff training.
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	Yes	Compliant file	Case communication and evidence is recorded in the complaint file for each complainant.

	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	Compliment Concerns and Complaints Policy Training	Staff training
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	Housing Management Manual Letter of Appointment Resident Handbook	Forms part of the appointment Staff trained Lead person (Housing Manager) ABC Process
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	Compliment Concerns and Complaints Policy Housing Management Manual	As above

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	Compliment Concerns and Complaints Policy Staff training	Staff training covers this
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	Compliment Concerns and Complaints Policy	Ou Complaints Register sets out if timescales have been achieved Copies of letters kept on file
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Compliment Concerns and Complaints Policy Complaints Register Board reporting	Timelines set out in Policy. Monitored by Board quarterly
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than	Yes	Compliment Concerns and Complaints Policy	Covered in staff training. Each case is assessed and extension requested are issued with notice and reasons and timeframe.

	10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Template letters Compliment Concerns and Complaints Policy	Staff training covers this.
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	Complaint Register Board reporting	Written responses issued within the prescribed timeframes with any follow up actions. Complaints monitored in a way to either complete them or keep open until all recorded actions have been completed.
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	Written response letters.	Complaint responses scrutinised by Exec Team member for quality accuracy and content.
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	Yes	Compliment Concerns and Complaints Policy	Additional complaints are assessed and recorded appropriately.

	delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Response letters	Templates used for consistency and quality

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	Complaint record keeping. Written responses.	Cases are escalated as per the code.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes	Compliment Concerns and Complaints Policy	Stage 2 data is recorded and a senior staff member is allocated to respond.

	within five working days of the escalation request being received.			Cases are reported to Board.
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	Written responses	We do not ask residents for an explanation for requesting a stage 2 consideration.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Compliment Concerns and Complaints Policy	There is a separate case allocation in place for stage 2 complaints.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Compliment Concerns and Complaints Policy Board reporting.	Set out in Policy. Closely monitored by Board.
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	Compliment Concerns and Complaints Policy Written responses.	Staff training
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	Compliment Concerns and Complaints Policy Response letters.	Staff trained. Template letters.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address	Yes	Complaint Register. Response letters.	Written responses are issued within the prescribed timeframe with follow up

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			actions. Complaints are monitored.
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	Response letters.	Complaint responses scrutinised by Exec Team member for quality accuracy and content.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Compliment Concerns and Complaints Policy Response letters.	Templates. Responses scrutinsed.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaint Register.	Stage 2 process is in place and is monitored by senior staff.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been 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	Compliment Concerns and Complaints Policy Response letters.	Covered in staff training.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compliment Concerns and Complaints Policy Response letters.	All remedial action agreed and approved by senior staff member and reported to Board
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	Complaints Register Board reporting.	Complaints are tracked.
7.4	Landlords must take account of the guidance issued by the Ombudsman	Yes	Compliment Concerns and Complaints Policy	ACTION: To introduce a Compensation Policy.

	when deciding on appropriate remedies.		Board reporting.	
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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:	Yes	Compliments Concerns and Complaints Policy	Complaint handling reported to Board quarterly.

	<p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>		<p>Annual Complaints & Performance Improvement Report</p> <p>Self-Assessment</p>	<p>Annual Report completed in June 2024.</p>
8.2	<p>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.</p>	Yes	<p>Annual Complaints & Performance Improvement Report published on website.</p>	<p>Included Board comments.</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Not applicable this year	Not applicable this year
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Not applicable this year	Not applicable this year
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Not applicable this year	Not applicable this year

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	Annual Complaints & Performance Improvement Report Quarterly reports to Board	Service improvement measures are identified and actions put in place. Friends and family as a sense check and that all this information goes to OSMG as well

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	Annual Complaints & Performance Improvement Report Quarterly reports to Board Staff training records Compliments Concerns and Complaints Policy	We use complaints as a valuable resource to learn about our services, how our residents experience or perceive them and to make improvements. We also collect Friends and Family cards as a sense check and that all this information goes to OSMG & Board F&P Committee.
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	OSMG Staff Forum	Review, learn, change and cascade
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	Compliments Concerns and Complaints Policy	The CEO
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	Compliments Concerns and Complaints Policy	The Chair has been appointed as Member Responsible for Complaints (MRC) to Board.

9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Board F&P reporting and minutes.	The MRC is part of the Finance and Performance Committee (F&P) and oversees this self-assessment and scrutinises the complaints performance and has regular meetings with the CEO.
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	Finance & Performance Committee (quarterly) papers and minutes	Reported quarterly to Board through the F&P.
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;	Partial	Training records Supervision Forms	ACTION: This is to be added to the Supervision Form templates for all staff.

	<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>			
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