



**Housing**  
Ombudsman Service

# Director of Housing and Tenant Experience Housing Ombudsman's Complaint Handling Code Compliance Self-assessment 2024

This self-assessment form should be completed by the designated complaints lead within Golden Lane Housing and it must be reviewed and approved by the Board at least annually. All statements must be supported with evidence, and with additional useful commentary.

Once approved, Golden Lane Housing must publish the self-assessment as part of an annual complaints performance and service improvement report on the Golden Lane Housing website. **The Board's response to the report must also be published alongside that documentation.** A summary of this information can also be used for external reporting to Stakeholders within the Annual Report and Financial Statements of the Board, and the Annual Report to Tenant's.

## Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Action  |
|----------------|--|------------------|---|---|
| 1.2            | A complaint must be defined as:<br><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>  | Yes              | Complaints Policy section 2 confirms we will use the definition set by the Housing Ombudsman.   | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p>   |
| 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              | <p>Complaints Policy section 4 confirms that we will work in line with the requirement, customers given choice and don't have to use word complaint.</p> <p>All colleagues complete complaint/ombudsman online training as part of induction process.</p> | <p>Improvement Action</p> <p>2. Complete colleague training to ensure all colleagues can correctly identify and record a complaint.</p> <p><b>Lead:</b> Head of Tenant Experience</p> <p><b>Completion date:</b></p> <p>1. 30/09/24</p> |
| 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              | A definition of a service request is included in the complaint policy section 2.  | <p>Improvement Action</p> <p>1. Review the process to record, monitor and review service requests.</p> <p><b>Lead:</b> Head of Tenant Experience</p> <p><b>Completion date:</b> 30/09/24</p>  |

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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 | All colleagues complete complaint/ombudsman online training as part of induction process.   | <b>None</b>             |
|     |  |     |   | <b>Lead:</b>            |
|     |  |     |   | <b>Completion date:</b> |
| 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 | The Tenant Experience Team collate survey responses and follow up on any expression of dissatisfaction. This follow up includes giving the tenant the choice to raise a complaint. The Tenant Experience Manager is responsible for this process. | <b>None</b>             |
|     |  |     |   | <b>Lead:</b>            |
|     |  |     |   | <b>Completion date:</b> |

## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Action                  |
|----------------|---|------------------|---|-------------------------|
| 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              | Point 2.2, Exclusions in our Complaints Policy confirms that we will work in line with this requirement.<br>Head of Tenant Experience responsible to determine if complaint not accepted. | <b>None</b>             |
|                |   |                  |   | <b>Lead:</b>            |
|                |   |                  |   | <b>Completion date:</b> |

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| 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"> <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> | Yes | Point 2.2, Exclusions in our Complaints Policy confirms that we will work in line with the Code requirement. | None   |
|     |  |     |  | <b>Lead:</b> Head of Tenant Experience   |
|     |  |     |  | <b>Completion date:</b>  |
| 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 | Point 2.2, Exclusions in our Complaints Policy confirms that we will work in line with this requirement.     | None   |
|     |  |     |  | <b>Lead:</b>   |
|     |  |     |  | <b>Completion date:</b>  |
| 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  | Yes | Point 2.2, Exclusions in our Complaints Policy confirms that we will work in line with the Code requirement. | Improvement Action:<br>1. Review complaint letter templates to ensure not upheld includes Ombudsman information. |
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|     | 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. |     |   | <b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b><br>1. 30/09/24 |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | Point 2.2, Exclusions in our Complaints Policy confirms that we will work in line with this requirement.<br>Point 3 in complaints policy confirms we will consider individual circumstances | None<br><b>Lead:</b><br><b>Completion date:</b>                                  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Action  |
|----------------|---|------------------|---|---|
| 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              | Points 1.3 and 4 in our Complaints Policy confirm that we work in line with the Code requirement.<br><br>Our complaints policy is on the website in different formats, plain English and video format and has been made more visually prominent via a button. | Improvement Action:<br>1. Complete colleague training.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 1. 30/09/24 |
| 3.2            | Residents must be able to raise their complaints in any way and with any  | Yes              | All colleague's complete complaint/ombudsman online   | Improvement Action:<br>1. Complete colleague training.  |

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|     | 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.   |     | training as part of induction process.<br>“How to Make a Complaint” include all ways to make a complaint.  | <b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |
| 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 | All colleagues complete complaint/ombudsman online training as part of induction process.<br><br>Reporting and Benchmarking groups in place to track complaint volumes.                          | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |
| 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 | Complaint policy available on the website in plain English and an accessible video.<br>Point 4.3, 4.4 and 4.5 in our Complaints Policy confirms that we will work in line with this requirement. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |
| 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 | Point 1.5 in our Complaints Policy confirms that we will work in line with this requirement.<br><br>Our complaint letter templates include information about the Ombudsman.                      | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and  | Yes | Point 4 in our Complaints Policy confirms that we will work in line with the requirement.  | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |

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|     | to be represented or accompanied at any meeting with the landlord.   |     |   |  |
| 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 | Point 5 in our Complaints Policy confirms that we will work in line with the requirement. | Improvement Action:<br>1. Review complaint letter templates to ensure not upheld includes Ombudsman information.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |

#### Section 4: Complaint Handling Staff

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Action   |
|----------------|--|------------------|---|--|
| 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 Tenant Experience Manager is responsible for recording complaints and monitoring regulatory requirements. Within Property services we have a dedicated quality manager to own repairs complaints. The Tenant Experience Manager is responsible for complaint liaison with stakeholders. | Improvement Action:<br>1. Internal complaints process will define the Complaints Officer role and assigning process, specific training to be provided.<br>2. Liaison with stakeholders is to be defined within complaint training as Tenant Experience Manager role.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints.  | Yes              | The Tenant Experience Manager reports to the Director of Housing and Tenant Experience  | Improvement Action:<br>1. Complete colleague training specifically with key internal   |

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|     | They must also have the authority and autonomy to act to resolve disputes promptly and fairly.  |     | and is responsible for the management and delivery of the complaints service.             | colleagues around complaint priority and authority.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24   |
| 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 | All colleagues complete complaint/ombudsman online training as part of induction process. | Improvement Action:<br>1. Complete colleague training specifically with key internal colleagues around complaint priority/culture and continuous improvement process.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |

### Section 5: The Complaint Handling Process

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Action   |
|----------------|---|------------------|--|--|
| 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              | Singel Complaints Policy is in place.  | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b> |
| 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              | All colleague's complete complaint/ombudsman online training as part of induction process.<br><br>Point 4 in our Complaints Policy confirms that we have 2 stages of the complaints process. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b> |
| 5.3            |   | Yes              |  | <b>None</b>  |



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|     | 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.  |     | Point 4 in our Complaints Policy confirms that we have 2 stages of the complaints process.<br><br>All colleagues complete complaint/ombudsman online training as part of induction process.      | <b>Lead:</b><br><b>Completion date:</b>   |
| 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 | Point 4 in our Complaints Policy confirms that we have 2 stages of the complaints process. Point 4.1 specifies that we will accept and handle a complaint in the same way with a representative. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Yes | We have a Repairs Code of Conduct in place for third parties.  | Improvement Action:<br>1. Define list of all third parties. Ensure code of conduct and complaints duties are communicated to all.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |
| 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,        | Yes | Understanding of complaint is in our acknowledgement, stage 1 and stage 2 complaint template letters.<br>Include outcomes in section 4 of complaint policy and our template letters.             | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |

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|      | the resident must be asked for clarification.  |     |   |   |
| 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 | Providing clarity on responsibility for all complaint points is the role of the complaints officer.   | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |
| 5.8  | At each stage of the complaints process, complaint handlers must: <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> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes | Point 3 and 4.4 in our complaint policy Review of point 3 and 4.4 of complaints policy confirm all these criteria.  | None<br><b>Lead:</b><br><b>Completion date:</b>   |
| 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 | Point 4 of our complaints policy confirm how we agree to keep residents informed about their complaint when outside Code timescales.<br><br>Extensions, agreements and contact frequency are all defined by the complainant and the complaints officer. | Improvement Action:<br>1.Add extension wording to complaints templates.<br><b>Lead:</b> Head to Tenant Experience<br><b>Completion date:</b><br>1. 30/09/24 |
| 5.10 |  | Yes |   | Improvement Action:   |

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|      | 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. |     | Application form records identified support needs. Tenant data recorded on ActiveH housing management system. Vulnerabilities and warning messages section recorded in Active H. Point 4.4 of complaint policy confirms reasonable adjustments. | 1. Review process for vulnerabilities and warning messages in active H needed.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b><br>1. 30/09/24   |
| 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 | Point 2.2 in Our Complaints Policy details any exclusions.<br><br>Point 4.5 in our Complaints Policy confirms that we will work in line with this criterion.  | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>   |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.                      | Yes | The Tenant Experience Manager is responsible for recording incoming complaint and complaint responses.<br><br>Our ActiveH CRM housing management system is used to support logging and recording of complaints.                                 | Improvement Action:<br>1. Review internal process defining and included in colleague training.<br>2. Review use of Software for logging/monitoring and continuous improvement process to improve efficiency<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b><br>1. 30/09/24<br>2. 31/03/25 |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints  | Yes | Providing remedies at all complaint stages is the role of the complaints officer.   | Improvement Action:<br>1. Undertake a review of the compensation policy  |

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|      | process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.   |     |  | <b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24        |
| 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 | An Anti-Social behaviour policy is in place and 04/07/24 Unreasonable Behaviour Policy presented to Board for approval | <b>None</b><br><b>Lead:</b> Head of Tenant Involvement<br><b>Completion date:</b> |
| 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 | 04/07/24 Policy presented to Board for approval and includes proportionality test                                      | <b>None</b><br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b>  |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Action   |
|----------------|---|------------------|--|--|
| 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 | Yes              | Point 4.4 in our Complaints Policy confirms that we will work in line with this criteria. Procedures in place. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b> |

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|     | risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.   |     |   |   |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>  | Yes | Point 4.3 in our Complaints Policy confirms that we work in line with this criteria. Monitoring and monthly reporting in place.                           | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |
| 6.3 | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Yes | Point 4.3 in our Complaints Policy confirms that we will work in line with this criteria. Procedures in place. Monitoring and monthly reporting in place. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Point 4.3 in our Complaints Policy confirms that we will work in line with this criteria. Procedures in place.  | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>  |
| 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 | This is in pace and the role of the complaints officer.   | Improvement Action:<br>1. Review complaint template letter wording.<br><b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |

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| 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 | This is the role of the complaints officer. Actions recorded and monitored for completion                   | Improvement Action:<br>1. Develop tasking through ActiveH housing management system to track actions and reporting.  |
|     |   |     |   | <b>Lead:</b> Head of Tenant Experience   |
|     |   |     |   | <b>Completion date:</b> 31/03/25   |
| 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 | Complaint response from the investigating manager is review by Head of Tenant Experience.                   | Improvement Action:<br>1. Complete colleague training specifically on content of responses and review template letters.<br>2. Define internal quality process for complaints which will include audits and sign off process. |
|     |   |     |   | <b>Lead:</b> Head of Tenant Experience   |
|     |   |     |   | <b>Completion date:</b> 30/09/24   |
| 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 | 4.2 of Complaints Policy outlines stage 1 requirements. Procedure confirms all concerns to be investigated. | None   |
|     |   |     |   | <b>Lead:</b>   |
|     |   |     |   | <b>Completion date:</b>  |
| 6.9 |   | Yes |   | <b>None</b>  |
|     |   |     |   | <b>Lead:</b>   |

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|  | <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>Complaint template letters are in place and enable core requirements to be complied. Procedures in place. Complaint response from the investigating manager is review by Head of Tenant Experience.</p> | <p><b>Completion date:</b></p> |
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## Stage 2

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Action  |
|----------------|--|------------------|--|---|
| 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              | Point 4.5 in our Complaints Policy confirms that we will work in line with this criteria. Procedure in place.  | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |
| 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              | Point 4.5 in our Complaints Policy confirms that we will work in line with this criteria. Procedure in place. Monitoring and reporting undertaken of timescales. | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |

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| 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 | Point 4.4 and 4.5 in our Complaints Policy confirms that we will work in line with this criteria.  | <b>None</b>   |
|      |   |     |  | <b>Lead:</b>  |
|      |   |     |  | <b>Completion date:</b>                                     |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | Point 4.5 in our Complaints Policy confirms that we will work in line with this criteria. Procedure in place with different investigating officer.             | <b>None</b>   |
|      |   |     |  | <b>Lead:</b>  |
|      |   |     |  | <b>Completion date:</b>                                     |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes | Point 4.5 in our Complaints Policy confirms that we will work in line with this criteria. Procedure in place. Monitoring and reporting of timescales in place. | <b>None</b>   |
|      |   |     |  | <b>Lead:</b>  |
|      |   |     |  | <b>Completion date:</b>                                     |
| 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 | Point 4.5 in our Complaints Policy confirms that we will work in line with this criteria. Procedure in place. Complaints officer considers extensions.         | <b>None</b>   |
|      |   |     |  | <b>Lead:</b>  |
|      |   |     |  | <b>Completion date:</b>                                     |
| 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 | This is the role of the complaints officer and is included in the procedure.   | Improvement Action:<br>1. Review Complaint template letter. |
|      |   |     |  | <b>Lead:</b> Head of Tenant Experience                      |
|      |   |     |  | <b>Completion date:</b> 30/09/24                            |



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| 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 | This is the role of the complaints officer. Actions recorded and monitored for completion.   | Improvement Action:<br>Develop tasking through ActiveH housing management system to track actions and reporting.             |
|      |  |     |  | <b>Lead:</b> Head of Tenant Experience   |
|      |  |     |  | <b>Completion date:</b> 31/03/25   |
| 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 | This is the role of the complaints officer.<br>Procedure in place  | Improvement Action:<br>1. Develop an internal quality process for complaints which will include audits and sign off process. |
|      |  |     |  | Lead: Head of Tenant Experience  |
|      |  |     |  | Completion date: 30/09/24  |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made; the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Complaint template letters enable core requirements to be complied.<br>Procedures in place.<br>Stage 2 response reviewed by Head of Tenant Experience. | Improvement Action:<br>1. Review Complaint template letters  |
|      |  |     |  | <b>Lead:</b> Head of Tenant Experience   |
|      |  |     |  | <b>Completion date:</b> 30/09/24   |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff   | Yes | The stage 2 final response involves the Head of Tenant   | <b>None</b>  |
|      |  |     |  | <b>Lead:</b>   |

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|  | members needed to issue such a response. |  | Experience and investigating officer. | <b>Completion date:</b> |
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### Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Action  |
|----------------|--|------------------|--|---|
| 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"> <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              | Complaint template letters enable core requirements to be complied and followed by the complaints officer. | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | The process follows the Housing Ombudsman remedy guidance. Our compensation                                | Improvement Action:<br>1. Review of the compensation policy.          |

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|     |   |     | policy has been identified as requiring update.            | <b>Lead:</b> Head of Tenant Experience<br><b>Completion date:</b> 30/09/24 |
| 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 | The process follows the Housing Ombudsman remedy guidance. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | The process follows the Housing Ombudsman remedy guidance. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>                     |

### Section 8: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Action   |
|----------------|--|------------------|--|--|
| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:<br>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.<br>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; | Yes              | The annual complaints performance and service improvement report was presented to the Housing and Property Committee on 4 <sup>th</sup> June 2024.<br><br>Annual self-assessment against the Complaint Handling Code presented to the Governance Committee and 14 <sup>th</sup> May 2024 Board for approval. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b> |

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|     | <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> |     |   |   |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.   | Yes | The annual complaints performance and service improvement report was reported and approved by the Board at the meeting 4 <sup>th</sup> July 2024. The Board approved the Response to be published on the Golden Lane Housing website. | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes | The requirement will be followed should there be such significant change.   | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes | A review and update of the self-assessment will be undertaken if asked  | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances,   | Yes | The requirement will be followed if we are unable to comply with  | <p><b>None</b></p> <p><b>Lead:</b></p>                                |

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|  | 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. |  | the Code due to exceptional circumstances. | <b>Completion date:</b> |
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### Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Action   |
|----------------|--|------------------|---|--|
| 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              | Themes, root cause analysis and service improvements are identified for each complaint and recorded and reported monthly to Executive as part of performance reporting. Complaints reporting to the Housing and Property Committee includes service improvements from learning from complaints. | <b>None</b><br><b>Lead:</b><br><b>Completion date:</b>   |
| 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              | A record of themes and actions are recorded against each complaint by the Tenant Experience Manager. Service improvements are identified from each complaint and actions monitored to   | Improvement Action:<br>1. Complete complaints training which specifically, will cover complaints culture and continuous improvement.<br><b>Lead:</b> Head of Tenant Experience |

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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 | <p>Complaints handling is covered at:<br/>The tenants group More Choices More Voices and recorded in the minutes and<br/>Board and Tenants Working Together and Housing and Property Committee minutes.</p> <p>The is a Complaints Tenant Involvement Rep</p> <p>"How we are doing" published on website quarterly.</p> <p>Monthly/quarterly complaint performance reports and complaint communication to leaders monthly.</p> | <p>Improvement Action:<br/>1. The Head of Tenant Experience to send a quarterly continuous improvement report which will be available to all stakeholders.</p> <p><b>Lead:</b> Head of Tenant Experience</p> <p><b>Completion date:</b>30/09/24</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 | Head Of Tenant Experience is responsible for these criteria. Monthly assessment and reporting in place.  | <p>Improvement Action:<br/>1.The Head of Tenant Experience to send a quarterly continuous improvement report to include trends, systems issues, risks and policy reviews.<br/>2. Risks identified will be added to the operational</p>              |

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|     |   |     |   | <p>risk register and reviewed regularly.</p> <p><b>Lead:</b> Head of Tenant Experience</p> <p><b>Completion date:</b>30/09/24</p> |
| 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 | Chair of the Housing and Property Committee   | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p>   |
| 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 | <p>Complaint report is provided to each Housing and Property Committee.</p> <p>Quarterly performance reports which detail volume, categories, outcomes of complaints as well as reviews of service failings and issues.</p> | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p>   |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> </ul> | Yes | <p>Housing and Property Committee receive complaint report at each meeting</p> <p>The Board receive the annual performance report on complaints including the Ombudsman's Self-Assessment.</p>                              | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p>   |

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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>Quarterly performance reports which detail volume, categories, outcomes of complaints as well as reviews of service failings and issues.</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>This objective is set out in our Complaints Policy.</p> <p>Golden Lane Housing has in place a code of conduct for all employees.</p>         | <p><b>None</b></p> <p><b>Lead:</b></p> <p><b>Completion date:</b></p> |