

Transform Housing & Support

Self-assessment against the Housing Ombudsman Service's Complaint Handling Code 2024-25

This self-assessment form has been completed by the complaints officer and reviewed and approved by the Board on 22 May 2025.

We publish the self-assessment as part of the [Annual Complaints Performance and Service Improvement Report](#) on our website. The Board's response to the report is published alongside this in section 4 of this report.

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or	Yes	Clearly stated in Complaints Policy 3.1 and on our website complaints page	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of 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	Clearly stated in Transform's Complaints Policy 3.2.	
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	<p>Clearly stated in Complaints Policy 3.3 and on website complaints page. Local teams have close contact with clients and deal with the majority of service requests on a day-to-day basis. We log our service requests for repairs on our housing management system.</p> <p>We identify service requests where it is clear an issue is being raised for the first time but reported by the complaints process. In order to provide an audit trail and ensure accountability, we work to the complaints timescales to respond.</p>	<p>We undertook a review of service requests in three services during Autumn 2024. This determined that the main areas for service requests was maintenance, and these are already recorded as repairs orders. Most other "service requests" related to the provision of support. The exception was ASB which was formally logged in client's records. We are therefore able to identify when a client made a service request related to housing management (repairs or ASB) and can identify if any then become formal complaints. This enables us to learn.</p> <p>We are exploring opportunities to develop the functional requirements and specification for a new CRM with external consultants. Complaints would be part of any new case management system and this would include enhanced functionality for clients to raise service requests.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Clearly stated in Complaints Policy 3.3 and Complaints procedure	During a complaint this year we dealt with service requests received during and as part of investigations into the complaint. We did not wait for the conclusion of the complaint.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>During the client satisfaction survey (CSS) individual expressions of dissatisfaction were identified and the individual (if not option to remain anonymous) was contacted. In 2023, this was after the conclusion of the survey.</p> <p>The individual was given details of how to make a complaint, or the complaint is logged at the point of contact.</p> <p>All clients are made aware of the complaints procedure when they sign their tenancy or licence agreement. Their attention is drawn to the relevant section of the tenant handbook and properties with noticeboards have a copy attached. The procedure is also easily accessible via the website.</p>	<p>In 2024 we added “hot alerts” so that, if a respondent consented for their details to be shared, and said they had a complaint (new or unresolved) or a repair or were very dissatisfied overall, we received notification and were able to follow up. The hot alerts were agreed with the Client Forum – who also shaped and changed some of the non-TSM questions</p> <p>The Client Survey in 2024 had links to Transform’s complaints form and information on how to make a complaint.</p>

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	Clearly stated in our Complaints Policy 6.1 - Exceptions, and procedure, and on our website complaints page	<p>In 2024, we had one complaint from a partner organisation about the conduct of a member of staff. This was dealt with outside the complaints process as it did not relate to housing management services. The matter was reported to the Charity Commission as a serious incident. It has now been resolved.</p> <p>We have used our “Unreasonable Behaviour when making a complaint” process with an external complainant who raised multiple separate complaints over short periods of time. We explained that accepting and acknowledging each separate complaint was impacting on our ability to investigate and resolve the matter. We did however address all examples raised in the responses.</p>
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>Clearly stated in our Complaints Policy Section 6 ‘Things we will not consider as a complaint’, and procedure, and on our website complaints page.</p> <p>In 2.1 we refer to how we deal with complaints about other people under other policies which support the Complaints Policy such as our Anti-Social Behaviour Policy. Any exclusions are closely monitored in the case management system to ensure fairness and a reasonable approach</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Exclusions are clearly stated in our Complaints Policy 6.1 and website complaints page . Our Complaints procedure states that complaints must not be refused without a valid reason	
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	Our Complaints procedure sets this out and our 'Excluded Complaint Response Template Letter' is sent to clients. This provides an explanation as well as the Housing Ombudsman's details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As defined in Complaints Policy we consider each complaint's individual circumstances.	

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	Clearly stated in Complaints Policy 5.8. Our website complaints page details 'how to make a complaint' - whether via the website, phone, email, letter or social media. We do not require complaints to be put in writing by the complainant as this can act as a deterrent. We also explain that complaints can be submitted by a third party on the client's behalf and that complaints may be made in a way that works best for clients. We can provide support in line with our Reasonable Adjustment Policy and Vulnerability Policy	Third parties can submit complaints on a client's behalf or assist complainants with raising complaints. We have updated our form in-year during 2024 to help identify third party representatives, their relationship to the Transform client, and clarify who we should respond to.
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	As 3.1 above. In February and March 2024, all colleagues, in all departments at Transform, were trained in how to recognise and log a complaint. We also have a dedicated intranet page which includes all complaints information and how to seek advice from the complaints team when handling a complaint.	Staff have accepted complaints from clients verbally, in regular support meetings and at house meetings. The staff members have used the complaints form to assist recording. Our central complaints team have also taken phone calls from clients and recorded and responded to them appropriately.
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	Transform welcomes feedback and complaints from clients. Our Complaints Policy Section 1 opens with an explanation of why complaints are important to us, in line with our values respect, responsibility, empowerment and excellence. Work has been undertaken, and is continuing, to make complaints information more accessible to clients and colleagues in terms of the complaints process, with information available on our website complaints page and the intranet. (see 3.2 above).	We developed our complaints policies with input from our Client Forum and included clients' voices and feedback in our training for staff on complaints. We used examples of learning from complaints (and the client survey) in a recent tender and were awarded full points for evidence of learning and service improvements. We have established a specialist electrician in our out of hours contracts arrangements as a result of a complaint from a client whose

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>electrical supply failed over the weekend.</p> <p>We recruited to a Team Administrator for Client Services and a core part of their role is to administer and co-ordinate complaints to improve handling and client experience</p> <p>We have a regular complaints handlers meeting to share learning and support continuous improvement.</p> <p>In 2024, we have presented quarterly reports on complaints received, lessons learnt and actions taken are shared with the Client Forum.</p> <p>These were already reported to our Trustees' Client Experience and Impact Committee, which includes client members.</p>
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	As stated in our Complaints Policy section 5 and clearly stated on the website complaints page . Transform operates a two-stage process. And as per 5.2.	We promoted the complaints policy to clients through the Clients Hub on our website and through Client Newsletters, explaining the process. The newsletters use plain English and are available in large print and in different languages to promote accessibility. Quarterly reports go to the Clients Forum for their feedback.
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	This is explained in our Complaints Policy 5.3 and all necessary information is available on our website complaints page . The information regarding the Ombudsman is also clearly detailed in all template letters to clients. Our website and template letters were recently updated to reflect the Ombudsman's new postal address.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Yes, clearly stated on our website complaints page and in the Complaints Policy 5.6	Representatives are now identified in the complaints form from the outset. This change was implemented in the autumn of 2024.
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	Yes, clearly stated on our website complaints page and in the Complaints Policy 5.5. This is also clearly detailed in all complaints template letters to clients, to ensure this is adhered to.	

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	Transform has a complaints team that monitors all complaints and ensures timescales are adhered to. This team is supported by the Director of Client Services and the Client Experience & Impact Committee (CEIC), which includes Trustees and two members of the Client Forum. The Chair of the CEIC reports to the Board on their findings.	Quarterly reports on complaints are made to the CEIC.
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	Clearly stated in the Complaints Policy 7.4a. The complaints team has autonomy to deal with and resolve all complaints or escalate as necessary.	We have supported and empowered complaints handlers, through the complaints handlers forum, to be confident in offering compensation to clients at an earlier stage in the complaints handling process.
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	In February and March 2024 all colleagues were trained in identifying complaints and how to deal with them, and the importance of fostering a positive complaints culture. Further training was carried out to ensure that any colleague can log a complaint for a client, regardless of how that complaint is made. Learning from complaints is reviewed with Operational Managers and is used to inform practice developments and priorities. The quarterly Complaints Handlers' forum supports individual and senior managers who undertake investigations and promotes and shares best practice.	The complaints policy and procedure is part of our core induction for all staff. They have access to the recorded training that was developed with clients. We budgeted for a new post of Client Services Team Administrator and appointed to the role to better resource our handling of complaints.

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	Transform has a single Complaints Policy available on the website complaints page .	
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	Transform operates a simple procedure of Stage 1 and Stage 2 as set out in the Complaints Policy .	
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	As 5.2 above.	
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	Only one process is used which is monitored by the complaints team and Transform does not use third parties.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As 5.4 above.	
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	Clearly stated in the Complaints Policy (For stage 1, 8.2, and for stage 2, 8.8). Our template acknowledgement letter for both stages includes this information to ensure adherence, and this is monitored by the complaints team.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not,	Yes	Our Complaints procedure states that we will be clear what is considered as part of the complaint, and what is not. If any element of the complaint is not a service, we provide we must signpost them to the	We have advised a complainant of elements of a complaint which were outside the remit of Transform. We provided information on who to contact and then, with their consent, informed

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	responsible for and clarify any areas where this is not clear.		correct organisation and this is included in the complaint acknowledgement letter template to ensure adherence. This is monitored by the complaints team.	the relevant organisation of the complaint. With the complainant's consent we shared information and advocated for them with the other agency to ensure an appropriate resolution.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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	<p>Clearly stated in our Complaints Policy 5.2 and 7.4 and procedure and this was incorporated in our colleague training which was delivered in February and March 2024.</p> <p>When allocating a complaint handler, we consider potential or perceived conflicts of interest. A complaints handler from another service or outside the management structure of the service used by the complainant will be allocated to ensure impartiality.</p>	<p>Opportunities to meet the investigating officer are offered.</p> <p>We have discussed the importance of understanding and learning from the complainant's perspective in our complaints handlers' forum.</p>
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	Clearly stated in our Complaints Policy 8.4 stage 1, 8.10 stage 2 and is incorporated in our standard complaints extension letter templates.	
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	Clearly stated in our Reasonable Adjustment Policy , client disabilities and vulnerabilities are also recorded on the support section in our Pyramid record system. Clients are asked if there is any vulnerability we need to take into consideration at the outset of a complaint. We consider vulnerabilities in accordance with our Vulnerability Policy .	We have updated our complaints report form to ask whether there is anything we need to consider when investigating the complaint. This was actioned by autumn 2024.
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,	Yes	Clearly stated in our Complaints Policy 8.7 and set out in all complaint letters sent to clients.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and they must comply with the provisions set out in section 2 of this Code.			
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	All correspondence, documentation and details of outcomes are contained in the complaints case management system.	Where clients express a preference for phone or in person contact only, the complaint handler will record a note of the conversation and discussions, and any outcome agreed.
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	Transform strives to resolve complaints as early as possible with a fair and reasonable outcome (5.2 of the Complaints Policy). We also highlight this in the procedure and standard wording in Complaint letter templates.	We have worked with the complaints handlers' forum to empower complaints handlers to offer compensation at an early stage wherever appropriate.
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	Our Unacceptable Behaviour Policy sets out the way we will deal with unacceptable behaviour which involves a staged approach (Section 5) and we have arrangements to review any limits we put in place (Section 7).	We have explained to a complainant that raising multiple separate complaints about a specific situation can detrimentally impact upon the timely investigation and resolution of their concerns.
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	We have provisions in our Unacceptable Behaviour Policy which highlights exceptions to the policy (Section 6) which states that will not use any actions or limits which would discriminate against anybody.	

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	Clearly stated in our Complaints Policy 5.2d. All complaints go through an immediate investigation at acknowledgment stage to identify if an immediate resolution can be delivered or whether escalation to an investigating officer is required if more complex.	We have worked with the complaints handlers' forum to empower complaints handlers to offer resolutions including compensation at an early stage wherever appropriate.
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	Clearly stated in our Complaints Policy 8.2. Our procedure requires that the Stage 1 acknowledgement letter template is used. The case management system is used to monitor any pending deadlines.	We have achieved this
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Clearly stated in our Complaints Policy 8.5. Our procedure requires that the Stage 1 response letter template is used. The case management system is used to monitor any pending deadlines.	We monitor our performance in this area. Where necessary, we issue extension letters. Where we have not met targets, we have factored this into our offered resolution, including compensation for any additional distress.
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	Clearly stated in our Complaints Policy 8.4. Our procedure requires that the Stage 1 extension letter template is used. This includes an explanation for the extension period and the deadline for the full response. Our case management system is used to monitor any pending deadlines.	
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	Our procedure requires that the Stage 1 extension letter template is used. This includes the contact details of the Housing Ombudsman.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Clearly stated in our Complaints Policy 8.5, we send a full response within 10 days of acknowledgement including details of what we have done and anything we still need to do and when we aim to do it by. The complaints team track outstanding actions and keep the complainant up to date.	In one case, we agreed actions with a client but the contractor failed to deliver the works by the agreed date. We kept in regular touch with the client through their keyworker and the Director of Client Services. Additional solutions were offered and the client received assurances that we were taking the issue seriously and working to resolve it. They felt heard and respected through the process.
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	Clearly stated in our Complaints Policy 8.5 that a full response will be provided including the reasons for any decisions we have made. Guidance is provided in the Stage1 Complaint outcome letter template.	
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	This is clearly stated in our Complaints Procedure. If new issues are raised during the life of the complaint these should be added to the complaint definition and investigated within the same timescales if they are related to the existing complaint and the response has not been issued. If the response has been sent, the new issues are unrelated, or it would unnecessarily delay the response to include them at this stage, the new issues must be logged as a new complaint case via the Complaint Team.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes	Our Complaints Policy 8.5 details how we respond and sets out required content for the response in line with these requirements. We use standard complaint letter templates for all complaints and these are available to all colleagues on the intranet.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> 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. 			

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	Our Complaints Policy 8.6 highlights that if a client is not satisfied with the response to stage 1 then the complaint is escalated to stage 2 and it details what this involves (8.6 to 8.8). Our stage 2 response provides details of how to escalate to the Housing Ombudsman if the client is not satisfied with our response (8.11).	We received 10 Stage 2 escalations during 2024/25.
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	Our Complaints Policy 8.8 requires acknowledgement within 5 working days of receipt. Our Complaints procedure requires this information to be logged in the Complaints Case Management system. Our stage 1 acknowledgement template includes the complaint definition.	This has been achieved
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	Our Complaints Policy 8.7 does not require an explanation, although we do ask what aspects of our stage 1 response the client is not happy with so we can focus on the right aspects during our stage 2 investigation. The stage 2 investigating officer will contact the client for full understanding.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our Complaints Policy 8.8 states that the stage 2 investigating officer will usually be a more senior member of staff than the individual investigating Stage 1.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Clearly stated in the Complaints Policy 8.11. This is monitored in the Case Management system	We have monitored this. In one case, a delay arose as the complainant was unable to meet with the complaint handler until after the target timescale.
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	As per Complaints Policy 8.10 and monitored in the Case Management system.	
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	Our Stage 2 extension letter template includes this information.	
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	Clearly stated in our Complaints Policy 8.11 we send a full response within 20 days of acknowledgement with details of what we have done, anything we still need to do and when we aim to do it by. The complaints team track outstanding actions and keep the complainant up to date.	We provide information about what actions will be taken, and include timescales, for example for repairs to be complete.
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	Clearly stated in our Complaints Policy 8.11 that a full response will be provided including the reasons for any decisions we have made. Guidance is provided in the Stage 2 Complaint outcome letter template.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	As per the Complaints Policy 8.11. All this information is included in Stage 2 Complaint response letter template used for	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; c. the reasons for any decisions made; d. the details of any remedy offered to put things right; e. details of any outstanding actions; and f. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 		all complaints and available to all colleagues on the intranet.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our Complaints Policy has only two stages as stated in 1.4 and detailed in section 8.11 and the flowchart at Appendix 1 shows that following Stage 2 clients may escalate their complaint to the Housing Ombudsman if not satisfied.	

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	This is included in our Complaints Policy section 10 and in Complaint letter templates used by all colleagues and available on the intranet. We have also made the Housing Ombudsman's document 'Apologies Guidance for Landlords' available.	<p>Our template letters and guidance support complaints handlers to address all these requirements.</p> <p>We report on complaints to the Transform Client Forum on a quarterly basis and identify lessons learnt and changes made. The Client Forum has been actively involved in reviewing and agreeing changes to policy and practice. This includes our Temporary Rehousing Policy, E-bikes & E-scooters Policy and they are currently influencing our revised ASB and "Client case conferencing" policies. The need for these reviews and updates has in part been identified through our review of complaints.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our Compensation Policy 7.3 states that we will consider each case based on what has happened and the impact it has had on the client. Compensation is based on the level of impact, whether mild, moderate or severe (Section 8). Other remedies are explained in Section 6. Complaints Policy	
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	Our Complaints Policy section 10 sets out how we acknowledge responsibility and put things right. The Compensation Policy section 7 includes timeframes for deciding compensation and how we inform clients and section 9 provides the timeframe for making payment. Our template letters for Stage 1 and 2	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			sent to the client also detail this information. The complaints team monitor outstanding actions to ensure that these are delivered.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We approved a new Compensation Policy in February 2024 which was implemented on 1 April 2024. This reflects the Housing Ombudsman's guidance on remedies (Section 8).	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; any findings of non-compliance with this Code by the Ombudsman; the service improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	The Annual complaints report and self-assessment, which includes all the areas stated in 8.1 was scrutinised by Executive on 16 April, Client Experience & Impact Committee on 29 April and Board on 22 May 2025. It is then published on the website. In addition, we shared learning from our complaints and reported this to our Client Forum.	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Following the meeting on 22 May 2025, the Board's response to the Annual Complaints Performance and Service Improvement Report can be found in Section 4 of the report here .	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This self-assessment reflects the new complaints and associated policies and	We have policies for: Complaints Compensation

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			procedures we developed in 2023/24 and implemented from 1 April 2024.	Reasonable Adjustments Unacceptable Behaviour Vulnerability
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	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.	

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	Learning is collated and reviewed from an individual, local and organisational perspective, any issues arising are then disseminated to the appropriate colleagues and teams for actioning. We continue to develop our arrangements for learning from our complaints: from case review, to internal scrutiny through frontline reflection, manager and team meetings and our Complaint Handlers' Forum to external Scrutiny, including the TSM Perception Survey, our Client Forum and ultimately Executive Overview by the Executive Team, Client Experience and Impact Committee through to our Board. We also closely monitor current Housing Ombudsman publications including press releases about recent cases, the decision archive and Spotlight Reports.	
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	We have included learning from complaints in reports to the Client Forum, Client Experience and Impact Committee and Operational Managers Meetings. They are helping inform practice developments and priorities.	<p>From Autumn 2024, we have presented quarterly complaints data and learning/ insights to our Client Forum. Their additional insights have been used to shape learning.</p> <p>We have commenced a review of our ASB policy and commissioned new training for managers as a response to reviewing complaints and issues.</p> <p>We have also developed and will introduce a client case conferencing policy to ensure clients are constructively engaged around any tenancy/ licence breaches and are supported and empowered to understand and fulfil their</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				responsibilities. This has been informed by complaints from clients.
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	Wider learning is shared as set out in 9.1 above.	
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	The Director of Client Services supervises the Complaints team who monitor any trends occurring and identify and risks to individuals, locality or the organisation.	Initial themes have been included in CEIC reports and at our Operational Managers Meeting, as well as discussed with the Client Forum. This has informed revision of the policy and practice areas identified in this self-assessment. We have also invested in training for staff on trauma-informed practice and have commissioned ASB training for managers for delivery in 2025.
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	The Board has appointed the Chair of our Client Experience & Impact Committee as our Member Responsible for Complaints. She is responsible for ensuring the Board receive regular complaints information. She will have access to colleagues and information to be able to report on their findings in complaints. Her details are available on our website complaints page .	
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	The MRC as Chair of Client Experience & Impact Committee reports back to the Board at each meeting on the outcome of the Committee's review of complaints.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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	<p>We have quarterly reporting on complaints to our Client Experience & Impact Committee. The annual complaints and service improvement report was considered by the Client Experience & Impact Committee on 29 April and Board on 22 May 2025.</p>	<p>The Executive Team receives regular updates on complaints and agreed the business case for a new role to improve our complaints handling capacity and effectiveness</p> <p>The Client Forum also receives quarterly reports on operational matters including complaints.</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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>All colleagues received training on delivering a positive complaint handling culture during February and March 2024.</p> <p>This included the voice of the client.</p> <p>The Complaints Handlers Forum is used to share learning and improve communication and joint working across directorates.</p>	<p>We actively promote a learning culture, focused on continuous improvement, and our Ways of Working are based upon the principles of person-centred, relationship-based, strengths-focused and trauma-informed approaches. Empowering clients is central to our objectives and purpose and enabling them to complain, raise concerns and feel heard is core to our approaches.</p>