

Grosvenor Hart Homes: Housing Ombudsman Self- Assessment Form

Please find the Grosvenor Hart Homes (GHH) self-assessment against the Housing Ombudsman Complaint Handling Code 2024 as of November 2024.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>Included in GHH policy in extract on page 2:</p> <p><i>‘We regard a complaint as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual tenant, group of tenants, prospective tenants, other customers, contractors or members of the public.’</i></p>	
1.3	<p>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.</p>	Yes	<p>This is set out on page 2 of our policy:</p> <p><i>“We acknowledge that a customer may not explicitly use the word ‘complaint’ when expressing dissatisfaction but it will be made clear to the customer that they have the choice to register their</i></p>	



			<p><i>dissatisfaction as a formal complaint.”</i></p> <p>And page 3:</p> <p><i>“Any complaints that are submitted via a third party or representative will be handled in line with our standard GHH policy and procedures.”</i></p>	
1.4	<p>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.</p>	Yes	<p>This distinction is set out on page 2 of the GHH policy:</p> <p><i>“Occasionally a customer may be unhappy with the actions or services provided by GHH but have no interest in engaging in a formal complaint investigation or may not require us to respond to their concerns in writing. On these occasions we will treat the report as a service request and work with the customer at the point of contact to put things right and achieve a solution that is acceptable to all parties... Our systems enable us to record and track these ‘service requests’ allowing us to establish an audit</i></p>	



			<i>trail and learn from customer feedback.”</i>	
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	This is detailed in the GHH policy on page 2: <i>“If a customer is not satisfied with the response that they receive to their ‘service requests’ they will be provided with information on how to register a formal complaint, even if the handling of the service request is ongoing. When a service request becomes a complaint, we will continue our efforts to address the service request.”</i>	
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	This is detailed on page 3 of the GHH policy: <i>“Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. Whenever we request feedback from our customers, we will provide information on how</i>	



			<i>customers can make a complaint if they wish to.</i>	
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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	<p>This is detailed in the GHH policy on page 2:</p> <p><i>“We will consider all complaints on an individual, case-by-case basis and accept all complaints referred to us within 12 months of the issue having occurred or the resident becoming aware of the issue unless there is a valid reason not to do so.... If we do not accept a complaint, we will explain the reason for our decision (and how we propose to address the customer’s concerns) and inform the customer that they have the right to take that decision to the Housing Ombudsman.”</i></p>	
2.2	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	Yes	<p>This is detailed in the GHH policy on page 2:</p>	



	<p>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. 		<p><i>“We may not consider an expression of dissatisfaction under this policy if the issue:</i></p> <ul style="list-style-type: none"> • <i>occurred more than 12 months ago</i> <ul style="list-style-type: none"> • <i>has already been considered under this policy</i> • <i>is a complaint about another tenant</i> • <i>circumstances out of our control</i> • <i>is subject to legal action</i> • <i>relates to an insurance claim.”</i> 	
2.3	<p>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.</p>	Yes	<p>This is set out in the GHH policy on page 2:</p> <p><i>“We will consider all complaints on an individual, case-by-case basis and accept all complaints referred to us within 12 months of the issue having occurred or the resident becoming aware of the issue unless there is a valid reason not to do so. In some cases, we may apply discretion to accept complaints issued beyond this time limit where there are good reasons to do so.”</i></p>	



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	This is detailed in the policy on pages 2-3: <i>“If we do not accept a complaint, we will explain the reason for our decision (and how we propose to address the customer’s concerns) and inform the customer that they have the right to take that decision to the Housing Ombudsman. We will comply with any subsequent Ombudsman decision which directs us to accept a complaint where the Ombudsman does not feel the exclusion has been fairly applied.”</i>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is indicated in the GHH policy on page 2: <i>“We will consider all complaints on an individual, case-by-case basis”</i>	

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	<p>The various ways complaints can be made is set out in the GHH policy on page 1 and then on page 3 of the policy e.g.</p> <p><i>“Feedback may be provided and complaints can be made in one of the following ways:</i></p> <ul style="list-style-type: none"> • <i>by telephone on 01244 563777 (core office hours: Monday-Friday, 9am-5pm)</i> • <i>in person at any of our offices</i> • <i>via our online complaints form on our website Hart Homes (grosvenor.com)</i> • <i>in writing to any of our offices</i> <ul style="list-style-type: none"> • <i>by email to tenant.support@grosvenorhart.com”</i> <p>We also state on page 7 that in line with fulfilling our duties under the Equality Act 2010, we will:</p>	



			<p><i>“Adapt our approach considering the needs of our customers and make reasonable adjustments to ensure a tenant can raise and address their complaint with us.”</i></p>	
3.2	<p>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.</p>	Yes	<p>This is detailed in the GHH policy on page 4:</p> <p><i>“Customers can raise a complaint with any member of GHH staff. Staff will be trained in handling and responding to complaints appropriately and will be empowered to deal with complaints as and when they arise including escalating the complaint to the appropriate person within the organisation.”</i></p>	
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>	Yes	<p>This is stipulated on page 3 of the GHH policy:</p> <p><i>“In our endeavour to ensure our complaints process is accessible to our customers, we may reflect on a low volume of complaints as a sign that our customers are unable to complain and look at how we can address this. Conversely, we do not necessarily see a high complaints volume as negative, but rather as a</i></p>	



			<i>sign that customers are aware of our procedures and that our complaints process is accessible.”</i>	
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	The GHH Complaints Policy is available and signposted on our website. All tenants are issued with a tenant handbook on move in with a summary of the complaints process.	
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	The GHH policy states how we will publicise the policy on page 7: <i>“We will ensure that our complaints policy and process, the Housing Ombudsman’s Complaint Handling Code and the Housing Ombudsman scheme (including contact information) is promoted in leaflets, posters, newsletters, online and as part of our regular correspondence with customers.”</i>	We will ensure this information is in all future leaflets, posters, newsletters
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	This is detailed in the GHH policy on page 3 and referred to as an advocate: <i>“Complainants may make a complaint via an advocate. An</i>	

	accompanied at any meeting with the landlord.		<i>advocate could be a friend, relative, or an advocacy service such as the Citizens Advice Bureau... An advocate can accompany or represent the customer throughout the complaints process including at meetings with GHH..”</i>	
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	<p>This is detailed in the GHH policy on page 1:</p> <p><i>“We will also publish on our website details about the Ombudsman and how customers can contact them.”</i></p> <p>Information about how to contact the Ombudsman service, including the contact details, is available in the tenant handbook and on the GHH website and will be made clear to customers at each stage of the process.</p>	

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	<p>As indicated in the GHH policy on page 7, our Housing Director (DCEO) is the GHH appointed Complaints Officer.</p> <p>We have also appointed a Lead Member Responsible for Complaints on our Board.</p>	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<p>As above, this officer is our Housing Director and DCEO, with access to all staff and Board and authority to appropriately act on complaints.</p>	
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	<p>Our approach to learning from complaints is set out on page 7 of the GHH policy e.g.</p> <p><i>“Effective complaint handling is a key priority for us and we are committed to learning from complaints and to establishing a</i></p>	<p>We are in the process of developing further our training requirements for staff around complaints handling.</p>

			<i>positive complaint handling culture.”</i>	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have a single complaints policy for all customers.	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion.	Yes	<p>This is detailed in the GHH policy on page 2 e.g.</p> <p><i>“We will do this by:</i></p> <ul style="list-style-type: none"> <i>Resolving matters locally and as quickly as possible by being open, accountable and outcome focused”</i> <p>Our complaints process has two stages: stage 1 and stage 2 as detailed on pages 4-6.</p>	



			<p>As indicated, customers can decide to submit service requests rather than requests but these sit outside of our complaints policy as per page 2 of our policy:</p> <p><i>“Our systems enable us to record and track these ‘service requests’ allowing us to establish an audit trail and learn from customer feedback, but we will not routinely report upon them and to all intent and purpose they will fall outside of the scope and remit of this policy”</i></p>	
5.3	<p>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.</p>	Yes	<p>This is outlined on page 4 of the GHH policy:</p> <p><i>“We have a two-stage complaints process.”</i></p>	
5.4	<p>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.</p>	N/A	<p>All GHH complaints are handled by GHH staff according to one GHH complaints process.</p>	



5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	All GHH complaints are handled by GHH staff in line with the Code.	
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	This approach is outlined on pages 4 of the GHH policy: <i>“When we acknowledge a complaint...we will set out our understanding of the complaint and the outcomes the customer is seeking i.e. the ‘complaint definition’. We will seek clarification of the customer’s views where this is necessary and if any part of the complaint is unclear.”.</i>	
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	This is stated on the GHH policy on pages 4 and 5: <i>“We will also make clear which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear.”</i>	
5.8	At each stage of the complaints process, complaint handlers must: 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;	Yes	This is set out in the Complaint Investigation Principles section on page 3 of the GHH policy: <i>“To ensure that a complaint investigation is fair, at each stage</i>	



	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>		<p><i>of the complaints process we will:</i></p> <ul style="list-style-type: none">• <i>Deal with each case on its merits</i>• <i>Act independently and have an open mind</i>• <i>Give the customer a fair chance to set out their position</i>• <i>Take measures to address any actual or perceived conflict of interest</i>• <i>Consider all relevant information and evidence carefully”</i>	
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	<p>This is detailed in the GHH policy on pages 4 and 6 with the same approach at both stages 1 and 2 in line with the timescales set out in the Ombudsman Code e.g.</p> <p><i>“If an extension of more than 10 working days is required to enable us to respond to the complaint fully, we will agree this with the customer and agree suitable intervals with the customer for keeping them informed about their complaint. Where agreement over an extension period cannot be</i></p>	



			<i>reached, we will provide the Housing Ombudsman’s contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.</i>	
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	This is detailed in the GHH policy on page 7: <i>“We will...Keep a record of any reasonable adjustments agreed with customers as well as recording any disabilities residents have disclosed and keep the reasonable adjustments under active review.”</i>	
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	This is detailed in the GHH policy on page 5: <i>“Once Stage 1 has been completed, if all or part of the complaint is not resolved to the customer’s satisfaction it will be progressed to Stage 2, unless an exclusion ground applies. In cases where we cannot accept a complaint because exclusion</i>	

			<i>grounds apply, we will explain the reason to the customer.”</i>	
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	<p>This is detailed in GHH policy on page 6:</p> <p><i>“In all cases, we will keep a full record of each complaint and the outcomes at each stage.”</i></p> <p>We have a Complaints Log where staff record all key information about the complaint and outcomes and any correspondence with the resident and other documentation is recorded securely.</p>	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<p>This is detailed in GHH policy on page 7:</p> <p><i>“Remedies can be put in place at any stage of the complaints process as appropriate and in agreement with the Complaints Officer.”</i></p>	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	We set out our approach to restrictions on page 7 of the GHH policy:	We are in the process of devising an acceptable behaviour policy statement



	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		<p><i>“We may place restrictions on a customer’s contact with us where their behaviour becomes unacceptable, impacts upon our ability to consider their complaint or to serve other customers or they engage in abusive or threatening behaviour.</i></p> <p><i>In these instances, we will explain the reason for our decision and how we propose to engage with the customer to address their concerns. We will keep any restrictions we place under regular review.”</i></p>	which will be available on our website.
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	<p>This is detailed on page 7 of the GHH policy:</p> <p><i>“We will ensure our decision (to place restrictions) is proportionate and takes account of the customer’s needs and demonstrates regard for the provisions of the Equality Act 2010.”</i></p>	

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	This is detailed on the GHH policy on page 4: <i>“In the interest of seeking quick and early resolutions to complaints where possible, our initial triage process will consider the complexity of each complaint and whether the tenant is vulnerable or at risk and determine an appropriate course of action to resolve the case promptly at stage 1, providing an explanation, apology or other resolution without delay where possible.”</i>	
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	This is detailed in the GHH policy on page 4: <i>“When a complaint is made, it will be acknowledged, defined and logged at Stage 1 within five working days of receipt.”</i>	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	This is detailed in the GHH policy on page 4:	

	days of the complaint being acknowledged.		<i>“We will provide a full response to the complaint within 10 working days of the complaint being acknowledged.”</i>	
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	This is detailed in the GHH policy on page 4-5 e.g.: <i>“There will be times when we are unable to provide a comprehensive response in the timeframes set out. On these occasions, we may extend a response deadline by up to a maximum of 10 working days but only with the prior agreement of the complainant. On these occasions, complainants will be kept up to date and will receive an explanation for any delays.”</i>	
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 detailed in the GHH policy on page 5: <i>“We will provide customers with...the contact details of the Housing Ombudsman in case the customer is not happy with our proposed response timescale.”</i>	



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 detailed in the GHH policy on pages 4-5: <i>“We will respond when the answer to the complaint is known, not when any outstanding actions required to address the issue have been completed.... Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer.”</i>	
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	This is detailed in the GHH policy on page 4: <i>“Our response will address all the points raised in the complaint definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.”</i>	
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	Yes	This is detailed in the GHH policy on page 5: <i>“If, during the course of the Stage 1 investigation, further complaints are made by the</i>	



	<p>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.</p>		<p><i>customer, we will incorporate these into our response if the issues are related and we have not yet issued the Stage 1 response. In cases where we have already issued the Stage 1 response, where the new issues are deemed unrelated to the original issue under investigation or where incorporating the new issue would unreasonably delay the response, the new issue would be required to be logged as a new complaint.”</i></p>	
6.9	<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">a. the complaint stage;b. the complaint definition;c. the decision on the complaint;d. the reasons for any decisions made;e. the details of any remedy offered to put things right;f. details of any outstanding actions; andg. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	<p>This is detailed in the GHH policy on page 4:</p> <p><i>“Our response will be in writing in clear, plain language and include:</i></p> <ul style="list-style-type: none">• <i>the complaint stage</i>• <i>the complaint definition</i>• <i>our decision on the complaint</i>• <i>the reasons for any decisions made (referencing policy, law and good practice where appropriate)</i>• <i>the details of any remedy offered to put things right</i>	

			<ul style="list-style-type: none"> • <i>details of any outstanding actions</i> • <i>details of how to escalate the matter to Stage 2 if the customer is not satisfied with the answer.”</i> 	
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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	<p>This is detailed in the GHH policy on page 5:</p> <p><i>“Once Stage 1 has been completed, if all or part of the complaint is not resolved to the customer’s satisfaction it will be progressed to Stage 2, unless an exclusion ground applies... Stage 2 is the final stage in our complaints process and signals our final response to the issue as the landlord.”</i></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	<p>This is detailed in the GHH policy on page 5:</p> <p><i>“A request to escalate a complaint to Stage 2 will be acknowledged, defined and</i></p>	

			<i>logged within five working days of the escalation request being received.”</i>	
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	This is stated in the GHH policy on page 5: <i>“Customers do not have to explain their reasons for escalation to Stage 2 and we will seek to understand why the customer remains unhappy.”</i>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is stated in the GHH policy on page 5: <i>“a Stage 2 complaint will be considered by a member of our Executive Leadership Team as long as they have not considered the complaint at Stage 1.”</i>	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	This is detailed in the GHH policy on page 5: <i>“We will provide a final response to the complaint within 20 working days of the complaint being acknowledged.”</i>	
6.15	Landlords must decide whether an extension to this timescale is needed	Yes	This is detailed in the GHH policy on page 6:	



	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.		<i>“In exceptional circumstances where we are unable to respond within this timeframe, due to the complexity of the complaint, the timeframe may be extended. We will provide an explanation to the customer and confirm a clear timeframe for when the response will be received. This extension should not exceed 20 working days without good reason.”</i>	
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 detailed in the GHH policy on page 6: <i>“ We will continue to keep the customer up to date with the progress of their complaint and provide them with the details of the Housing Ombudsman if they are not satisfied with the timeliness of our response.”</i>	
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	Yes	This is detailed in the GHH policy on page 5: <i>“We will respond when the answer to the complaint is known, not when any outstanding actions required to</i>	



	actioned promptly with appropriate updates provided to the resident.		<i>address the issue have been completed.... Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer.”</i>	
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 detailed in the GHH policy on page 5: <i>“Our response will address all the points raised in the complaint definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.”</i>	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	This is detailed in the GHH policy on page 5: <i>“ Our response will be in writing in clear, plain language and include:</i> <ul style="list-style-type: none"><i>• the complaint stage</i><i>• the complaint definition</i><i>• our decision on the complaint</i><i>• the reasons for any decisions made</i>	

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.		<ul style="list-style-type: none"> • <i>the details of any remedy offered to put things right</i> • <i>details of any outstanding actions</i> • <i>details of how to escalate the matter to the Housing Ombudsman service if the customer remains dissatisfied.</i> 	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>This is detailed in the GHH policy on page 5:</p> <p><i>“Stage 2 is the final stage in our complaints process and signals our final response to the issue as the landlord. It will involve suitable staff members needed to issue such a response. As such, A Stage 2 complaint will be considered by a member of our Executive Leadership Team as long as they have not considered the complaint at Stage 1.”</i></p>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or	Yes	This is detailed in the GHH policy on page 6-7:	



	<p>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. 		<p><i>“Where something has gone wrong, we will acknowledge this and take actions to put things right.</i></p> <p><i>This may include:</i></p> <ul style="list-style-type: none"> • <i>Apologising</i> • <i>Acknowledging where things have gone wrong</i> • <i>Providing an explanation, assistance or reasons</i> • <i>Taking action if there has been delay</i> • <i>Reconsidering or changing a decision</i> • <i>Amending a record or adding a correction or addendum</i> • <i>Providing financial remedy</i> • <i>Changing policies, procedures or practices.”</i> 	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>This is detailed in the GHH policy on page 7:</p> <p><i>“Any remedy offered will consider and reflect the impact on the customer of any fault identified.”</i></p>	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	<p>This is detailed in the GHH policy on page 7:</p>	

	appropriate. Any remedy proposed must be followed through to completion.		<i>“When a remedy is offered, we will clearly set out what will happen and by when, in agreement with the customer, where appropriate. We will follow through all remedies to completion.”</i>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	This is detailed in the GHH policy on page 7: <i>“We will also consult Ombudsman guidance when determining appropriate remedies.”</i>	

Section 8: Putting things right

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> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>An interim Annual Complaints Performance and Service Improvement Report for 2023-24 has been produced, acknowledging that GHH had a low number of tenants in that period and registered zero complaints. It discusses planned service improvements.</p> <p>Future annual complaints performance and service improvements reports will include an overview of performance, key themes, learning from complaints and any formal Housing Ombudsman determinations.</p>	<p>We are about to enter our first year of operation as a Registered Provider of Social Housing and we expect to produce our first full Annual Complaints Performance and Service Improvement Report for 2024-25 by 30 June 2025.</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 interim Annual Complaints Performance and Service Improvement Report for 2023-24 was submitted to the GHH Board for review and the report now includes the Board's response.	The Report will be published on the GHH website when the website goes live in early 2025.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This will be done as necessary.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	GHH commits to reviewing and updating the self-assessment following an Ombudsman investigation.	
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	In exceptional circumstances where we were unable to comply with the Code, we would inform the Ombudsman and our residents and publish on our website a timeline for returning to compliance with the Code.	

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	<p>Our approach is detailed in the GHH policy on page 8:</p> <p><i>“We will ensure that all employees understand our expectations and senior leadership considers insights from individual complaints, and broader themes and trends to ensure learning from complaints is translated into service improvements and positive changes to service delivery.”</i></p>	This will be done in practice when we have the data.
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	<p>Our approach is detailed in the GHH policy on page 8:</p> <p><i>“Effective complaint handling is a key priority for us and we are committed to learning from complaints and to establishing a positive complaint handling culture so we can effectively resolve disputes...We will ensure that all employees understand our expectations and senior leadership considers insights</i></p>	This will be done in practice when we have data.



			<i>from individual complaints, and broader themes and trends to ensure learning from complaints is translated into service improvements and positive changes to service delivery.”</i>	
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	This intention is set out on page 8 of the GHH policy: <i>“In line with our commitment to accountability and transparency, we will also report on our performance and learning and service improvements which have resulted from complaints to key stakeholders, including to our customer voice groups and committees.”</i>	This will be done in practice when we have data
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	As set out in our policy on page 8, our Housing Director and DCEO is accountable for complaint handling: <i>“Our Housing Director (DCEO) is our appointed complaints officer, who is responsible for complaints handling and will take the lead on assessing themes and trends, risks and where policies and procedures need to be revised.”</i>	

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	As set out in the GHH policy on page 8, we have appointed a Lead Board Member for complaints (MRC) (Terrie Alafat): <i>"We have an appointed Lead Member Responsible for Complaints (MRC) on our Board."</i>	
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	This is outlined in the GHH policy on page 8: <i>"The MRC is responsible for ensuring that the Board receives regular information on complaints to enable it to understand our complaints handling performance."</i>	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and	Yes	This is detailed in the GHH policy on page 8: <i>"We will ensure that the MRC and the rest of the Board receive regular updates on complaints including on volume, categories and outcomes, complaint handling performance, reviews of issues and trends and updates on the outcomes of any Ombudsman investigations and</i>	

	<p>progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p><i>progress in addressing any findings, as well as the annual complaints performance and service improvement report.”</i></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 approach is outlined on page 4 of our policy:</p> <p><i>“In our handling of complaints, our approach for all employees and any third parties we work with will seek to:</i></p> <ul style="list-style-type: none"> • <i>Take a collaborative and co-operative approach towards resolving complaints, working with colleagues across organisations and departments as appropriate.</i> • <i>Take collective responsibility for any shortfalls identified, rather than blaming others</i> • <i>Act within the professional standards for engaging with complaints as set by relevant professional bodies.”</i> 	