

## Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

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

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	2.1 Definition of a complaint We define a complaint using the Housing Ombudsman’s standard definition: “an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by ISHA, our own staff, or those acting on our behalf, affecting an individual resident or group of residents.”	Section 2.1
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Our residents do not have to specifically use the word ‘complaint’. Whenever a resident expresses dissatisfaction we will give them the choice to make a complaint. We will continue to address the service request if a complaint is raised. Complaints submitted via a third party or representative are handled in line with our complaints policy	Section 2.1
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	Yes	When the resident does not wish to complain but has made a service request, requiring us to take action to put something right, we will record, monitor and review the request regularly. A	Section 2.1

	to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		complaint will be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.	
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	A complaint will be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.	Section 2.1
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	Where we ask for feedback from resident surveys, we will provide information about our complaints process in case residents wish to raise any issues with us.	Section 2.1

## 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	We accept all complaints unless there is a valid reason not to. ISHA will consider all complaints on their own merits;	Section 2.2
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints</li> </ul>	Yes	<p>however, we may not accept a complaint if:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred more than 12 months ago.</li> <li>• Matters are being taken through ISHA's insurance claims procedure</li> <li>• The complaint is made by one ISHA resident against another resident. ISHA has a separate Anti-Social Behaviour policy to investigate such claims. However, we will investigate a complaint about how an ASB case or service request has been handled</li> <li>• a complaint is already being dealt with as a complaint (unless there is new evidence/information</li> </ul>	Section 2.2

	policy.		provided regarding a closed complaint) • The complainant is unreasonable, in line with our 'Dealing with unreasonable or unreasonably persistent customers' guidance. • The issue is part of an ongoing legal matter, which has been initiated by the resident or ISHA • it is a complaint about an outcome or judgment made by a court or tribunal • If we receive legal instruction or correspondence during the handling of a complaint, we reserve the right to hand over the case to our legal representative and write to inform the resident the complaint is closed.	
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	We accept all complaints unless there is a valid reason not to. ISHA will consider all complaints on their own merits; however, we may not accept a complaint if: • The issue giving rise to the complaint occurred more than 12 months ago.	Section 2.2
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the	Yes	If we decide not to accept a complaint, we will provide a detailed explanation about why it	Section 2.2

	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.		is not suitable for our complaints process and providing information about the right to take the decision to the Housing Ombudsman	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	We accept all complaints unless there is a valid reason not to. ISHA will consider all complaints on their own merits;	Section 2.2

### 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>Residents can raise a complaint with any member of staff or through all our usual contact points: • By telephone: 0300 131 7300 • By email: isha@isha.co.uk • Through our website: www.isha.co.uk • Via our social channels: X (formerly Twitter) @ISHA_London and Facebook • In writing, or in person: Islington and Shoreditch Housing Association, 102 Blackstock Road London N4 2DR</p> <p>A representative or advocate can act on behalf of a resident. They must provide signed authority from the resident. This could be a friend, relative or a representative of an external organisation such as the Citizens Advice Bureau or MIND. MPs and councillors can also enquire on behalf of a resident. Where a resident needs help to make a complaint, we will</p>	Section 2.3 and 2.4

			provide support needed including reasonable adjustments in line with the Equality Act 2010 and encouraging (with permission from the resident) the use of a representative or advocate where appropriate.	
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	Residents can raise a complaint with any member of staff or through all our usual contact points	Section 2.3
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	We want to hear from residents when they feel dissatisfied about their home, or a service provided by us or anyone acting on our behalf. We will make it easy for residents to tell us about their concerns in the way that is most convenient to them. We welcome complaints because they are important to us. We want to take the opportunity to fix an immediate problem, rebuild our relationship with our residents, learn from this and improve our services. We will always try to resolve a resident's complaint.	Section 2 policy statement
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	ISHA has a two-stage complaints policy to comply with the Housing Ombudsman's Complaint	Section 2.5 and section 2 policy statement



	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.		<p>Handling Code.</p> <p>Our complaints policy sets out how we will deal with complaints by aiming to resolve problems quickly, consistently, and fairly for our residents. The policy applies to all our residents, including anyone who receives a service provided by us, and covers actions by all ISHA employees including contractors, sub-contractors, agents and volunteers. Our complaints policy is informed by the Housing Ombudsman's Complaint Handling Code (April 2024).</p> <p>Our policy is available on our website <a href="https://isha.co.uk/complaints-policy-2023">Complaints policy 2023 (isha.co.uk)</a></p>	
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	<p>So that our residents understand their right to complain and how to do so, we will provide clear information about our complaints policy on our website and make it available through other channels whenever requested. This will include information about the Housing Ombudsman's Complaint Handling Code and how to raise a complaint directly</p>	Section 2.4

			with the Housing Ombudsman.	
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	A representative or advocate can act on behalf of a resident. They must provide signed authority from the resident. This could be a friend, relative or a representative of an external organisation such as the Citizens Advice Bureau or MIND. MPs and councillors can also enquire on behalf of a resident.	Section 2.4
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>Residents may complain directly to the Independent Housing Ombudsman after exhausting ISHA's complaints process.</p> <p>Residents may also contact the Ombudsman if they are having issues accessing ISHA's complaints process, do not agree with a proposed extension period, or if we have not responded in line with our complaints policy.</p> <p>The Ombudsman does not investigate complaints before the complaints process has been completed but can take steps to encourage resolution.</p>	Section 2.10

## 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	All complaints are managed by our Complaints and Resolution Team. The Complaints and Resolution Team will contact the resident to find out more about the complaint and liaise with relevant staff to investigate it.	Section 2.5
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	At each stage of the complaints process, our Complaints and Resolution Officers will deal with complaints on their merits, act independently and have an open mind. They will provide residents with a fair chance to set out their position and they will take measures to address any actual or perceived conflict of interest. They will consider all relevant information and evidence carefully. Importantly, the Complaints and Resolution Team have the authority and autonomy to act to resolve disputes quickly	Section 2.5

			and fairly.	
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>Complaints help us improve our service to residents and we strive to maintain a positive complaint handling culture. The Director of Culture, Communications and Involvement oversees complaint handling performance. With the complaints team, the Director is responsible for assessing themes and trends to identify potential systemic issues, serious risks or policies and procedures that require revision. The Director will help to set a standard objective for complaint handling for all relevant staff. The Director is also responsible for ensuring ISHA undertakes the annual complaints self-assessment and complies with other requirements under the legislation. We report regularly to ISHA's Board about our complaint's performance. A member of ISHA's Board is appointed to have lead responsibility for complaints and ensuring the Board receives regular information and insights, including updates on the volume, categories and outcomes of complaints, as well as reviews of</p>	Section 3 learning from complaints

			<p>issues and trends arising. The Board also reviews updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders. We report to residents on the learning and actions taken as a result of complaints received. We do this on our website and social channels, in resident newsletters and in our Residents' Annual Report. Our resident involvement strategy includes creation of a Resident Complaint Panel, which we are working towards.</p>	
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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	Our complaints policy sets out how we will deal with complaints by aiming to resolve problems quickly, consistently, and fairly for our residents. The policy applies to all our residents, including anyone who receives a service provided by us, and covers actions by all ISHA employees including contractors, sub-contractors, agents and	Section 1

			volunteers. Our complaints policy is informed by the Housing Ombudsman's Complaint Handling Code (April 2024).	
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	ISHA has a two-stage complaints policy to comply with the Housing Ombudsman's Complaint Handling Code	Section 2.5
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	ISHA has a two-stage complaints policy to comply with the Housing Ombudsman's Complaint Handling Code	Section 2.5
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	Our complaints policy sets out how we will deal with complaints by aiming to resolve problems quickly, consistently, and fairly for our residents. The policy applies to all our residents, including anyone who receives a service provided by us, and covers actions by all ISHA employees including contractors, sub-contractors, agents and volunteers.	Section 1
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our complaints policy sets out how we will deal with complaints by aiming to resolve problems	Section 1

			quickly, consistently, and fairly for our residents. The policy applies to all our residents, including anyone who receives a service provided by us, and covers actions by all ISHA employees including contractors, sub-contractors, agents and volunteers. O	
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	We will send written acknowledgement of the complaint within five (5) working days of receipt by ISHA. This will include a ‘complaint definition’, our understanding of the complaint and the outcomes the individual is seeking.	Section 2.6
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	When defining the complaint, we will be clear which aspects of the complaint ISHA is responsible for and which we are not.	Section 2.6
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> </ul>	Yes	. At each stage of the complaints process, our Complaints and Resolution Officers will deal with complaints on their merits, act independently and have an open mind. They will provide residents with a fair chance to set out their	Section 2.5

	<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>position and they will take measures to address any actual or perceived conflict of interest. They will consider all relevant information and evidence carefully.</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	The frequency of contact between the complaint handler and the resident will be agreed as part of the investigation and updates provided to the resident based on the agreement made	Section 2.6
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	Where a resident needs help to make a complaint, we will provide support needed including reasonable adjustments in line with the Equality Act 2010 and encouraging (with permission from the resident) the use of a representative or advocate where appropriate.	Section 2.4
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	We will accept all requests for escalation to Stage 2 of our complaints handling process unless we have a clear reason not to, and this will be considered on the merits of individual complaints, taking into account the exclusions below.	Section 2.7
5.12	A full record must be kept of the complaint, and the outcomes at each	Yes	Our complaints policy sets out how we will deal with complaints.	Sections 1 and 5



	stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		<p>Our complaints policy is informed by the Housing Ombudsman's Complaint Handling Code (April 2024).</p> <p>We also pay heed to relevant GDPR legislation.</p>	<p>Record keeping is part of our complaints handling process and our practice is to keep a full record as outlined in the code. We log the original complaint and the date received as well as all correspondence with the resident and other parties, as well as relevant supporting documentation.</p> <p>We will make this clear in our next policy update</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	We welcome complaints because they are important to us. We want to take the opportunity to fix an immediate problem, rebuild our relationship with our residents, learn from this and improve our services. We will always try to resolve a resident's complaint.	Section 2
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	We use our 'Dealing with unreasonable or unreasonably persistent customers' guidance, which may be used when managing unacceptable behaviour from residents and their representatives. This outlines the possible restrictions we may use and how and why we may implement them.	Section 2.2

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 use our 'Dealing with unreasonable or unreasonably persistent customers' guidance, which may be used when managing unacceptable behaviour from residents and their representatives. This outlines the possible restrictions we may use and how and why we may implement them.	Section 2.2
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## 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	At each stage of the complaints process, our Complaints and Resolution Officers will deal with complaints on their merits, act independently and have an open mind. They will consider all relevant information and evidence carefully. Importantly, the Complaints and Resolution Team have the authority and autonomy to act to resolve disputes quickly and fairly.	Section 2.5
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received</u></b> .	Yes	We will send written acknowledgement of the complaint within five (5) working days of receipt by ISHA.	Section 2.6
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	The assigned Complaints and Resolution Officer will investigate the complaint, make a decision, and inform the resident of that decision in writing, within 10 working days of ISHA acknowledging the complaint.	Section 2.6
6.4	Landlords must decide whether an	Yes	If necessary, the deadline may be	Section 2.6

	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.		extended for up to a further 10 working days with a valid explanation.	
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	We will also provide the contact details for the Housing Ombudsman at this time.	Section 2.6
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	Once the investigation is complete, we will write to the resident with the outcome of their complaint. • The details of how we are putting things right • any outstanding actions to resolve the issues raised and how they will be tracked and completed. The complaint handler will remain in contact with the resident until these actions are completed.	Section 2.7
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	We will 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.	Section 2.6
6.8	Where residents raise additional complaints during the investigation,		Where additional complaints are raised during the investigation,	Section 2.6

	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.		these may be incorporated into the Stage 1 response if they are related, and the Stage 1 response has not been issued. Where the response has been issued, the new issues are unrelated to the investigation, or it would unreasonably delay the response, the new issues raised will be logged under a new complaint.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Once the investigation is complete, we will write to the resident with the outcome of their complaint. This will include: • The complaint stage • The complaint definition • The decision on the complaint • The reasons for any decisions made • The details of how we are putting things right • any outstanding actions to resolve the issues raised and how they will be tracked and completed. The complaint handler will remain in contact with the resident until these actions are completed. • Details of how to escalate to Stage 2 if the resident is not satisfied with the response. ISHA will clearly state whether a complaint has been upheld, not upheld or partially upheld. Where	Section 2.7

			the complaint contains multiple issues, each issue will be dealt with separately.	
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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	If a resident remains dissatisfied with all or part of their Stage 1 response, the complaint can be progressed to Stage 2, the final stage of ISHA's complaints process.	Section 2.9
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	Requests for Stage 2 will be acknowledged and logged within five working days of the request being received	Section 2.9
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	Requests for Stage 2 will be acknowledged and logged within five working days of the request being received. This acknowledgement will set out our understanding of any outstanding issues and the outcomes sought to resolve the issue.	Section 2.9
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Stage 2 investigator is not the same person who conducted the Stage 1 investigation.	Section 2.9
6.14	Landlords must issue a final response	Yes	The resident will be notified of the	Section 2.9

	to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.		outcome of the review within 20 days of their request for escalation	
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	If the Stage 2 investigator feel the matter is complex and an extension may be required, an expected timescale for response will be provided. Any extension will not exceed a further 20 working days without good reason, and the reasons must be clearly explained.	Section 2.9
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	The Housing Ombudsman's contact details will be provided whenever we request an extension.	Section 2.9
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	<p>The Stage 2 response will include: • The complaint stage • The complaint definition • The decision on the complaint • The reasons for any decisions made • The details of how we will put things right • Details of any outstanding actions • Details of how to escalate to the Housing Ombudsman if the resident remains dissatisfied with the final outcome.</p> <p>We use a commitment log to monitor outstanding actions once</p>	Section 2.9

			a complaint has been closed.	
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	Where the complaint contains multiple issues, each issue will be dealt with separately.	Section 2.9
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	The Stage 2 response will include: • The complaint stage • The complaint definition • The decision on the complaint • The reasons for any decisions made • The details of how we will put things right • Details of any outstanding actions • Details of how to escalate to the Housing Ombudsman if the resident remains dissatisfied with the final outcome.	Section 2.9
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 is the final stage of our complaints process. The Stage 2 investigator will review the Stage 1 decision and how it was reached, as well as any new and relevant information not previously considered. This Stage 2 investigation will usually involve	Section 2.9



			<p>a meeting or telephone call to fully understand why the complaint has not been resolved. During the Stage 2 review, the investigator may identify further actions that could resolve the complaint. These actions will be carried out and the complaint closed, if there is nothing further to add and consequently the complaint has exhausted our complaints process, the complaint will be closed.</p>	
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## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> </ul>	Yes	<p>Once the investigation is complete, we will write to the resident with the outcome of their complaint. This will include:</p> <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• The complaint definition</li> <li>• The decision on the complaint</li> <li>• The reasons for any decisions made</li> <li>• The details of how we are putting things right</li> <li>• any outstanding actions to resolve the issues raised and how they will be tracked and completed.</li> </ul> <p>The complaint handler will remain in contact with</p>	<p>Where something has gone wrong we acknowledge and apologise for the service failure as a standard practice. We provide an explanation of what has gone wrong and what we will do about it. Our complaint responses include details of any outstanding actions and how they will be tracked and completed.</p> <p>We use our Compensation Guidance to offer financial</p>

	<ul style="list-style-type: none"> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		the resident until these actions are completed.	remedy if appropriate. We also update processes and policies where we find changes need to be made.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We use our compensation guidance document to inform decisions on remedy.	
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 complaint responses include: The details of how we are putting things right • any outstanding actions to resolve the issues raised and how they will be tracked and completed. The complaint handler will remain in contact with the resident until these actions are completed.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We use our compensation guidance document to inform decisions on appropriate remedies.	We are currently reviewing our compensation guidance against recent decisions by the Ombudsman regarding compensation amounts.

## 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> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p>In line with requirements of the Housing Ombudsman's Complaint Handling Code, we produce an annual complaints performance and service improvement report, which is reviewed by the Board and published on our website.</p>	Section 3

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	In line with requirements of the Housing Ombudsman's Complaint Handling Code, we produce an annual complaints performance and service improvement report, which is reviewed by the Board and published on our website.	Section 3
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We understand this requirement and it has not been necessary this year.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We understand this requirement and it has not been requested 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	We understand this requirement and it has not been necessary 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	With the complaints team, the Director is responsible for assessing themes and trends to identify potential systemic issues, serious risks or policies and procedures that require revision.	Section 3
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	Complaints help us improve our service to residents and we strive to maintain a positive complaint handling culture. The Director of Culture, Communications and Involvement oversees complaint handling performance. With the complaints team, the Director is responsible for assessing themes and trends to identify potential systemic issues, serious risks or policies and procedures that require revision.	Section 3
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	We report to residents on the learning and actions taken as a result of complaints received. We do this on our website and social channels, in resident newsletters and in our Residents' Annual Report. We report to our Resident Scrutiny Panel and our resident	Section 3

			involvement strategy includes creation of a Resident Complaint Panel, which we are working towards.	
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 Culture, Communications and Involvement oversees complaint handling performance. With the complaints team, the Director is responsible for assessing themes and trends to identify potential systemic issues, serious risks or policies and procedures that require revision.	Section 3
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	A member of ISHA's Board is appointed to have lead responsibility for complaints and ensuring the Board receives regular information and insights, including updates on the volume, categories and outcomes of complaints, as well as reviews of issues and trends arising.  ISHA's MRC was appointed at the March 2024 Board meeting.	Section 3
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	Yes	A member of ISHA's Board is appointed to have lead responsibility for complaints and ensuring the Board receives regular information and insights, including updates on the volume,	Section 3

	information and staff to perform this role and report on their findings.		categories and outcomes of complaints, as well as reviews of issues and trends arising. The Board also reviews updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>		<p>A member of ISHA's Board is appointed to have lead responsibility for complaints and ensuring the Board receives regular information and insights, including updates on the volume, categories and outcomes of complaints, as well as reviews of issues and trends arising. The Board also reviews updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders.</p> <p>In line with requirements of the Housing Ombudsman's Complaint Handling Code, we produce an annual complaints performance and service improvement report, which is reviewed by the Board and published on our website</p>	Section 3
9.8	Landlords must have a standard	Yes	The Director will help to set a	Section 3

	<p>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"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		<p>standard objective for complaint handling for all relevant staff.</p>	
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