Housing Ombudsman Service (HOS)

Self-assessment form - 2026

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: *'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.'*	Y	Definition of a complaint is consistent within our policy. Our complaints information including the definition. policy, process, additional guidance and useful downloads are available here: Home Group | Complaints process.	We have moved the complaints link to the top banner in the most prominent and highlighted position on our website home page to make this easier for customers to locate.
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.	Y	• The Complaints process documents make clear that customers don't need to use the word 'complaint' for it to be treated as such. • As above in section 1.2, this is set out in our policy and on our website. • The Complaints process documents make clear that we will deal with requests submitted via third parties or representatives. This is clear to customers on our website.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Y	The Complaints Policy, and supporting procedures, sets out the difference between a service request and a complaint. This is also reflected in the information to customers on our website.	
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.	Y	• Our website makes clear to customers that they can raise a complaint if they are unhappy with how their service request is being dealt with. • Complaints Policy makes clear that a customer can raise a complaint, in parallel to other processes to continue to address their service request.	In the next reporting period, we are launching a new AI driven knowledge management tool (HERO) for Customer Advisors, this will also help to improve effective triage and prevention of complaints and access to interpret this knowledge base quickly and effectively when dealing with customers.

			• Our procedures provide additional detail for colleagues in relation to this. The Contact Centre knowledge tool provides guidance on service requests and complaints.	
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.	Y	A section of text has been added to the end of all active surveys. This advises customers that their survey comments do not constitute a formal complaint or compliment. The text provides a link to the section of Home Group's website where the customer can formally log their complaint or compliment, should they wish to do so.	We are also integrating surveys into our new CRM platform to link dissatisfaction with specific customers and properties quickly and easily. Customer Insights are also trialling AI analytical tools to enhance identification of dissatisfaction to improve follow up and service recovery.

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	Y	• Our Complaints Policy, and supporting procedures, make clear the circumstances where we will not accept a complaint. This is also clearly explained to customers on our website. Both provide relevant examples of what would and wouldn't be accepted. • Our guidance for colleagues makes it clear that we will provide reasons to customers where we won't accept a complaint.	
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 residents. Acceptable exclusions include: • 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	Y	Our Complaints Policy, and supporting procedures, sets out the exclusions where we won't open a complaint. This is also set out on our website for customers.	

	the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.			
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.	Y	This is set out in our colleague procedures, on our website and within our information leaflet for customers. Customer leaflet: available from make a complaint page. Website content: complaints process.	
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.	Y	Our literature for customers, including our leaflet and letter template where we have not accepted the complaint, make clear why we won't accept a complaint and the footer of the letter makes it clear that the customer can go to the Ombudsman if they are dissatisfied with our decision.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	We do not take a blanket approach to excluding complaints, we will consider the individual circumstances of each complaint. This is set out in our policy and supporting procedures, and in our information to customers.	

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	Y	• Complaints accepted online, via telephone, in writing, in person, via social media channels, via e-mail and via chat bot. • Our Complaints Policy makes clear that we will provide reasonable adjustments and takes account of our duties under the Equality Act	

	residents who may need to access the complaints process.		2010. • The customer leaflet and our website also provides further details of reasonable adjustments, for example large print, Braille, or translation and interpretation services.	
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.	Y	• Our complaints procedures make clear that customers can raise a complaint in any way, to any colleague. • This is included within annual mandatory training for colleagues. • There is an internal form for colleagues to use to raise a complaint.	
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.	Y	• Our complaints policy makes clear that we welcome complaints from customers, setting out that we take a positive approach. • We monitor the number of complaints received, to make sure that we are addressing the root causes of complaints, but also to ensure that there are no barriers for customers accessing the complaints process. • Website content: complaints in numbers • CEO weekly update encourages colleagues to understand that complaints are everyone's responsibility and that we are learning from them.	
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.	Y	• The published Complaints Policy, complaints process webpage and customer leaflet explain the two-stage process, what customers can expect at each stage and the applicable response times. • complaints process and leaflet via webpage	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	• Complaints policy sets out this will be on our website. • Available to download on complaints process page.	

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.	Y	• Complaints policy (standard 2) confirms this. It is available to download on complaints process page. • Customer leaflet makes this clear that anyone can make a complaint to us, including a representative of someone who is not happy with our service. available from make a complaint page. • Website content: make a complaint: (If needed, someone else (a friend, relative, or advocate) can complain on your behalf with your permission). • Internal procedures also confirm this.	
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.	Y	• All complaint letters include this • complaints leaflet from website "making a comment or complaints" states you can contact HOS. • website has a hyperlink to HOS website • complaint procedures include info on HOS	

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.	Y	• The Complaints Team are the team responsible for complaint handling and are the contact point for the customer. • Role Profiles reflect this responsibility. • The Head of Customer Experience will complete a baseline review of the service across the end-to-end customer journey, supported by independent expertise, to identify further improvement opportunities. • Accountability transferred from the former Head of Customer Service role to the Head of Customer Experience on 1 October 2026.	The new post holder responsible for complaints will conduct a baseline review of the service across the end-to-end customer journey and we are appointing an independent consultant to support this work to maximise opportunities for further improvement under new leadership.

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.	Y	• Close relationships with complaint handler and complaint owner. • Complaints Team will engage with Subject Matter Experts in the business as required on more complex, involved complaints. • Complaints reporting and Management Information enhanced to provide insight into any delays in the business that are impacting complaint actions	
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.	Y	• All Complaint Handlers have received training on process and their role within this. This is also embedded to the complaint handler induction programme. • Training has been provided to all relevant staff, through mandatory training, on their role within the complaint handling process. • Consistent collaborative meetings in place for each region to review complaints, timescales, actions and learning – this has helped to drive improvement and risk mitigation. This is evidenced in improved compliance. • Periodic updates from the CEO as required driving the importance of complaints and managing customers effectively and efficiently • Quality Assurance completed on a sample of complaint cases to manage compliance to process and identify improvement opportunities. Second line compliance checks are also completed on a sample of cases.	

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.	Y	• Complaints Policy – standard 1 and 3 states we will always treat customers with respect and professionalism. • Available to download on complaints process page. • Our complaints leaflet also confirms to customers: "If you do make a complaint, we promise that we will never treat you less favourably in the future."	We are reviewing the Complaints Policy and will take up the Housing Ombudsman Service's offer to review the revised policy as an additional source of assurance. Any resulting changes will be considered through the relevant governance and approval arrangements.
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.	Y	• Complaints Policy makes clear that there is only a 2-stage process. We don't have an informal complaints stage. We have a clear distinction between a service request and a complaint, but we will deal with anything that falls within the definition of a complaint within our formal complaints' stages. • Available to download on complaints process page.	
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.	Y	• Complaints Policy confirms we only have 2 stages. • Available to download on complaints process page.	
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.	Y	• The Complaints Policy confirms that Home Group remains responsible for complaints about services delivered on its behalf in its capacity as landlord. These complaints are managed within our two-stage complaints process and in accordance with the Housing Ombudsman's Complaint Handling Code. • Where another registered provider is responsible for the property management or	• We are strengthening these arrangements to provide greater consistency and assurance, and to make responsibilities clearer for customers, colleagues and partners. • The revised Complaints Policy will be supported with

			supported service that is the subject of the complaint, we operate a 'handoff and monitor' approach. The provider supplies relevant evidence, investigates the service issue and completes agreed actions, while we retain oversight of the complaint process and monitor progress and resolution.	additional information identifying relevant Third-Party Managed and Housing Partnership properties and the applicable complaint arrangements • This information will be added to our website and made available through service-level channels and printed materials, such as leaflets, posters and direct communications will help customers clearly identify who is responsible, how to complain and how their complaint will be managed.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	• Housing Partnerships and Third-Party Managing Agents (third parties) cooperate under existing operational arrangements and provide the information needed to support timely investigation, response, escalation and resolution. • We monitor these arrangements through operational oversight and Social Housing in Partnership (SHIP) returns. • Salesforce property flags have improved visibility, as the strengthened arrangements (described in the next column) are implemented. • We are engaging with providers through roundtables and direct communications while the strengthened arrangements are being proposed and implemented. • We will continue to work with the Housing Ombudsman Service and relevant registered providers to clarify reporting responsibilities,	• Contracts, procedures and customer information are also being reviewed to clarify responsibilities for complaint recording, information sharing, escalation, oversight, learning and assurance. • We will seek assurance from relevant providers that their complaint-handling arrangements comply with the Housing Ombudsman's Complaint Handling Code and will use complaint insight to support service and provider improvement. • Additional arrangements are being introduced to strengthen assurance and make these complaints separately identifiable but fully

			support consistent customer journeys and avoid duplicate complaint reporting.	incorporate into our group-level reporting as required. • Refreshed guidance and training will support colleagues and partners where required. • **As with the actions outlined above in 5.4**, we intent to finalise these by the end of the FY 2026/27, however some contract renewals or variations may take longer to agree and execute, but we will continue to share progress through the self-assessment.
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.	Y	• Stage 1 and Stage 2 procedures – clear guidance in the procedures to understand the complaint issues and the customer's desired outcome • Stage 1 and Stage 2 letter templates – requirement to add the complaint issues and the customer's desired outcome. • Salesforce system has a dedicated field to record customer reason for complaint and desired outcome for both stage 1 and Stage 2.	
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.	Y	• Procedure guides to support colleagues with a stage one complaint make it clear that when the complaint is acknowledged the complaints points, the customer's desired outcome and the scope of the complaint are clear. • Where another organisation is responsible for the service or property issue, Home Group explains which aspects it will address and which require action by the relevant provider. Home Group coordinates the complaint route and retains oversight where the service is delivered on its behalf in its capacity as landlord.	

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; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Y	• Complaints policy and procedures make clear our standards for complaint handling, which make sure that the complaint is investigated thoroughly and independently. • Complaint handler job descriptions set out clear expectations. • Mandatory training in place for the complaint handling team and for all employees. • System and permission restrictions enabled to ensure information recorded is confidential. • Centralised and Independent team	Supported Service complaints have been centralised within the Complaints Team, providing additional oversight and supporting a consistent approach across these services.
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.	Y	• Guidance in colleague supporting procedures is consistent with the code: we will only extend where necessary and in agreement with the customer. We will keep the customer updated throughout. • Our website and leaflet also give timescales and state in some cases this may take longer and customer will be informed	
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.	Y	• Complaints Policy - Standard 2, Communication and Customer Involvement and our procedures set out our approach to this. • Our Person-Centred Service Delivery Policy sets out our policy on reasonable adjustments, which applies to all service delivery, including complaint handling. • Vulnerability flags process / warning markers enabled where appropriate and relevant within our core systems	Improving our customer data including strengthening our approach to managing customer vulnerabilities and diverse needs has commenced under a dedicated programme in Q2 of 2026.

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.	Y	• Our policy sets out customers' right to escalate a complaint. It makes clear that we will explain why we have refused any request for escalation but also make them aware of their right to take their complaint to the Ombudsman. • Complaint response letter templates all include how complaints can be escalated if the complainant remains dissatisfied.	
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.	Y	• The Complaints Policy and our internal procedures make it clear that the core systems records must be kept up to date at all stages of the investigation. • Complaint handling system, enabling more governance tracking & monitoring • The complaint record includes relevant correspondence and supporting evidence received from partners or other third parties.	We have invested in moving complaints into our new Customer Relationship Management System Salesforce to support case management, compliance and allow for continuous improvement to support this aim. Transition completed, as planned by June 2026.
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.	Y	• Our complaints policy and procedures encourage complaints to be remedied at the earliest opportunity, without the need for escalation.	Remedies can be applied at any stage of the complaints process without escalation. Further enhancements to remedies guidance are planned for 2026/27 to improve consistency and strengthen learning.
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.	Y	• We have a clear procedure on Managing Unacceptable Behaviour. • This process revised, updated and re-launched March 2025.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Y	• Our Person-Centred Service Delivery Policy makes clear that any restrictions will be proportionate and in line with the Equality Act. This is also included within	

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.		our procedure for Managing Unacceptable Behaviour. • Vulnerability flags / warning markers enabled where appropriate and relevant within our core systems	

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.	Y	• Stage One complaint handling process in place with full procedures to support all colleagues. Our policy and procedures make clear we will resolve at the earliest opportunity.	See 5.10 for further work on vulnerabilities.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure **within five working days of the complaint being received**.	Y	• Complaints policy and internal procedures state that complaints at stage one will be logged and acknowledged within five working days. • This is also explained on the website - Acknowledge, define and log your complaint within **five working days** of your complaint being received. Remember to take the postal service into account if you have written to us. • Salesforce (CRM System) tracks KPI's to ensure compliance.	

6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Y	• Complaints Policy (Appendix 1) confirms the timelines for acknowledging and responding to complaints. • Internal procedures also detail timelines for responding to complaints. • Website confirms this process - Send you a response letter addressing your complaint within ten working days • Internal system, Salesforce, monitors KPIs to ensure compliance.	• Salesforce system now allows heightened visibility and tracking of SLA's and KPI's associated to this code requirement • Our performance at the end for the financial year 25/26 was 88%. This has been improving month on month. Tighter controls and governance are now in place to monitor, track and improve. Our new system (Salesforce) has improved reporting to support this. Performance on this is tracked and monitored with robust reporting and scrutiny by our Board.
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.	Y	• Complaints policy appendices highlight that in exceptional cases, timelines for response might be extended to enable us to fully investigate and respond to the complaint and that customers will be informed on the extension and the reasons. • Website and leaflet confirm this - In complicated cases, this can take longer. We will give you an explanation and a timeframe for when you will receive the response. This will not exceed a further ten working days without good reason. • Internal procedures confirm this and provide guidance.	
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.	Y	• Where an extension to a Stage 1 response is required, we explain the reason for the customer, confirm the revised response date and provide the Housing Ombudsman Service's contact details.	

			Any extension is limited to a maximum of ten additional working days unless there is a good reason and this is agreed with the customer.	
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.	Y	• Internal procedures provide guidance on resolving complaints and that all outstanding actions are added to internal systems to be tracked and managed. • Response letters to complaints make it clear if any actions remain open and provide information on the remaining actions and who to contact for updates.	
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.	Y	• Internal procedures on resolving and responding to complaints provides guidance. • Response letter templates set out the details of what the complaint includes and the responses being provided covering relevant policy.	Quality assurance sampling checks that responses address all complaint points and provide clear reasons for decisions.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Y	• Internal procedures on resolving complaints cover information and guidance.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a) the complaint stage; b) the complaint definition; c) the decision on the complaint; d) the reasons for any decisions made;	Y	• Internal procedures on resolving and responding to complaints provide information and guidance on this. • Complaint response letters are structured per code requirements to provide all information to complainants.	

	e) the details of any remedy offered to put things right; f) details of any outstanding actions; and g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Y	• Complaints policy outlines the ability to escalate a complaint if customer remains unhappy - Where we cannot find a resolution to a complaint, we inform customers how they can escalate their complaint to the next stage in line with our complaints handling procedures. • Internal procedures provide guidance on complaint escalations.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Y	• Complaints policy set outs timescale for acknowledging complaints at stage two. • Website and complaints leaflet highlights timescales. • Internal procedures provide guidance on timeframes for complaints. • Internal system allows visibility of tracking SLA's.	
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.	Y	• Our internal complaints procedure encourages complaint handlers to understand why the customer has requested an escalation, to enable us to be able to resolve the complaint successfully for them. However, they are not required to explain if they don't wish to provide a reason.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	• Centralised complaints team which remains independent to other parts of our	

			business, cementing impartiality and application of fairness for our customers. • We have different complaint handlers at stage one and stage 2 of the process. • Guidance for the Stage 2 Complaint Handler is clear that the Stage 2 is an impartial review and the supporting SME in the business must not have been involved in the Stage 1 process • Website states - A senior colleague will review the original decision to ensure it was fair and reasonable.	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Y	• Complaints policy (Appendix 1) confirms the timelines of responding to complaints. • Website and leaflet highlight the timeline of responding to complaints - Provide a response addressing your complaint within 20 working days of the complaint being acknowledged • Requirements of the code are reflected in internal procedures and guidance.	As above, we continue to strive to improve our performance on complaint response times.
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.	Y	• Complaints Policy, Appendix 1. Available to download on complaints process page. • Internal procedures provide guidance on timescale extensions to complaint. • Customer leaflet: available from the same page. • Website content: complaints process. - In more complicated cases this can take longer to provide. We will explain why more time is required and inform of when the response will be received. This should not exceed a further 20 days without good reason.	
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.	Y	• Where an extension to a Stage 2 response is required, we explain the reason for the customer, confirm the revised response date and provide the Housing Ombudsman	

			Service's contact details. Any extension is limited to a maximum of twenty additional working days unless there is a good reason and this is agreed with the customer.	
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.	Y	• Internal procedures provide guidance on resolving complaints and that all outstanding actions are added to internal systems to be tracked and managed. • Response letters to complaints make it clear if any actions remain open and provide information on the remaining actions and who to contact for updates.	
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.	Y	• Internal procedures on resolving and responding to complaints provides guidance. • Response letter templates set out the details of what the complaint includes and the responses being provided should cover relevant policy.	
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 g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Y	• Internal procedures on resolving and responding to complaints provide information and guidance on this. • Complaint response letters are structured per code requirements to provide all information to complainants.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	• Home Group has a two-stage process. • Complaints Policy, Appendix 1 highlights only 2 stages of the complaint process. Available to download on complaints process page. • Internal procedures provide information	

			and guidance on the complaints process stages.	

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 intends to take, to put things right. These can include: • 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.	Y	• Internal procedures provide guidance to colleagues on the requirements of putting things right. • Website Explains to customers "Putting things right: what you can expect When something doesn't go right, we will always apologise. We learn from our mistakes, so they don't happen again" • Complaints policy standard 7 on discretionary compensation • Leaflet has a section on discretionary compensation.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	• Internal procedures provide information and guidance on remedies for complaints and how that reflects on the complainant's experience.	
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.	Y	• Internal procedures on resolving complaints and actions plans highlight remedies, outstanding actions and guidance. Any actions that remain outstanding once a complaint is closed will be clearly communicated to customers with timeframes on completion and contact details for those owning the resolution. • Internal systems track outstanding actions, and these are managed by the complaint	

			owners or subject matter experts. These are reported on regularly to ensure compliance in completing actions.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	Complaint handlers and complaint owners apply the Housing Ombudsman's remedies guidance, alongside internal procedures and compensation frameworks, to determine appropriate remedies.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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.	Y	• Our Annual Complaints Report 2025/26 was considered and approved by the Board. It reports complaint volumes, performance, trends and themes, customer experience, Housing Ombudsman determinations, learning and improvement priorities. • The report includes the Complaint Handling Code Self-Assessment and is published alongside the governing body's response, demonstrating Board oversight and assurance. • Our published Complaints Themes, Lessons, Actions and Outcomes report provides additional information about what we have learned from complaints, the actions taken and the resulting or intended customer outcomes. • We review and self-assess against relevant Housing Ombudsman Spotlight reports annually to identify wider learning and improvement opportunities. Resulting actions are recorded and monitored through our ACT learning tool. • The latest available Housing Ombudsman landlord performance information and relevant reports or publications are	In January 2026 we launched a new Customer Committee who also provide support for national / group-level complaints scrutiny and improvement. This is attended by the Member Responsible for Complaints alongside the Committee Chair; both are customers and Group Board Members. In Q3 2026/27 we are launching customer -led Regional Oversight Groups, Chaired by Customer Committee Members who will provide that function at a regional level to address the variation in local challenges, priorities and customer needs.

			considered through our annual reporting and complaints governance arrangements. Any material learning, risks or actions are incorporated into improvement activity and reported through the appropriate governance route. • The Annual Complaints Report and supporting learning information are published on the complaints section of our website, providing customers with transparent information about performance, learning and service improvement.	
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.	Y	• Yearly annual complaints performance report goes to Board for scrutiny and approval. • This alongside self-assessment and governing body response is also shared for discussion with our Customer Committee. • It is also published together in our complaints section of our website, alongside the statement from the Board.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	This is not currently applicable, but we would do this if the circumstances arose.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	Where requested, we would do this.	
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.	Y	Where relevant circumstances arise, Home Group will notify the Housing Ombudsman, providing all necessary information relating to the customer impact. Appropriate information will also be published on the organisation's website, including defined timescales for compliance and rectification. We have robust cyber security incident management procedures in place to mitigate this particular risk.	

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.	Y	• Lessons learned programme, data led insight and we are strengthening our root cause analysis • Customer Scrutiny panel carry out themed reviews the latest in-depth reviews can be found here: Home Group | Complaints performance • Detailed analysis by Regional Directors on severe maladministration • Repairs team have undertaken detailed analysis of repairs complaints, and this was reported to Board.	Arrangements are also being introduced to incorporate complaint insight relating to Housing Partnerships and Third-Party Managing Agents into group-level analysis of themes, risks, outcomes and service improvement, with relevant information becoming separately identifiable as the strengthened reporting model is implemented.
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.	Y	• Improved reporting and insight – weekly insight shared with the business • Analysis of lessons learnt is reported to the Board and published on our website through the annual complaints and service improvement report. • A group wide summary of lessons has been shared with Customer Committee and Board in September 2026 this has also been published here: Home Group | Complaints performance	We are developing and embedding the 'ACT' tool, which will strengthen consistency, tracking and support the analysis of lessons learnt. We are also refreshing our website architecture (design) and refreshing our content to make this information clearer to help customers understand learning, actions and outcomes. We will be working with customers to do this by the end of Q4 2026/27 as well as reviewing complaints performance information and STAIRS.
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	Y	• Annual performance report published on our website. • Complaints scrutiny group. • Board Reports with detailed analysis. • Viewpoint Teams / Regional Oversight Groups	

	to stakeholders, such as residents' panels, staff and relevant committees.		• Customer Committee • Lessons Learned Programme • Complaints Training Hub	
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.	Y	• Head of Customer Experience is accountable for the central complaints function and for assessing complaint themes, risks and improvement priorities. Bringing complaints closer to customer experience, service design and customer engagement supports stronger organisational learning. An end-to-end review of the complaint's customer journey and the operational performance of the central function is being undertaken to identify further improvement opportunities. • The Director of Customer Experience is the policy owner of the Complaints Policy as of July 2026, previously Executive Director of Customers and Communities. • We also have Executive Director sponsorship responsible for overall complaint handling.	Following approval of the revised Complaints Policy, Home Group will take up the Housing Ombudsman Service's offer to review the policy as an additional source of assurance. Any resulting changes will be considered through the relevant governance and approval arrangements.
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').	Y	• The Member Responsible for Complaints receives regular information on complaint volumes, categories, outcomes, trends and complaint-handling performance, alongside the wider Board. • The MRC has access to relevant colleagues and information to support scrutiny. • Complaints are regularly discussed through our customer governance structure in the national Customer Committee and our Regional Oversight Groups from Q3 2026. • The Board now receive regular updates and more recently a full review on complaints was on the agenda. • We also have Executive Director sponsorship responsible for overall complaint handling	

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.	Y	• The MRC meets regularly with relevant colleagues and carries out job shadowing with staff. • The MRC ensures the Board receives regular information.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Y	• The Board now receive regular updates. • We provided a full breakdown on KPIs, volumes, trends from Stage 1 – Ombudsmen Adjudication • They receive updates on ombudsman orders and complying with severe maladministration orders. • The Board receives an annual complaints performance and service improvement report	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Y	• Objective identified in the complaints handling guidance. • Mandatory training for all colleagues through induction • Refresher training modules throughout the calendar year • Complaints is regular agenda item for discussion within senior management meetings • Working groups formed throughout the business units to ensure a joint approach to managing complaints • There is additional guidance which covers roles and responsibilities for all colleagues	We expect colleagues and relevant partners to collaborate, take collective responsibility and maintain professional complaint-handling standards. As part of our People Strategy, we are exploring specialist support to refresh our induction and customer care training, alongside updated guidance and clearer provider expectations.