



**Annual Self-assessment**

**against Housing**

**Ombudsman Complaint**

**Handling Code**

**2024/25**

## 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 complaint's 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.

On the 6 January 2025 a formal merger between Housing Plus Group and Wrekin Housing Group took place. In March 2025, our Board approved a post-merger self-assessment. This indicated that there were areas of non-compliance, specifically related to the consistency of replying to complaints within the respective timescales. This had been identified within the due diligence and a clear action plan to secure improvement agreed by Board and overseen by the Service Performance and Customer Experience Committee.

The action plan included key learnings from the Spotlight Report in May 2024 on Southern Housing Group relating to complaints handling through mergers. Recognising this, a complaints workstream, reporting to the merger governance routes, was started in June 2024. This work had the following aims:

- Both legacy organisations sharing their respective complaints levels, performance and approaches;
- A clear, robust integration plan to ensure a smooth transition for customers during the merger.

During this process, it was shared that one legacy organisation had a backlog of complaints that were waiting to be allocated to a complaints officer. The organisation was aware of this and actively taking steps to effectively address this. During 2023/24, it was highlighted that after receiving five severe determination findings from the Housing Ombudsman in 2023, the legacy organisation commissioned an independent review of the complaint service delivery by HQN. Following this review, the delivery of this service moved to a centralised Customer Advocacy Team, where officers independent of services that were generating complaints, advocated for customers, moving away from just responding to complaints to resolving them at stage 1 of the process.

Following the implementation of this team in April 2024, unfortunately approx. 70% of existing team members left the organisation which led to the backlog of complaints awaiting allocation to an officer. The organisation actively took steps to effectively address this throughout 2024/25, whilst at the same time seeing positive results in the reduction of complaints escalating to stage 2 of the process.

Complaints performance was managed and monitored closely through the merger governance structures and at 6 January 2025, 65 complaints were awaiting allocation. Robust action was taken before and after the merger and this has led to this position moving to the removal of all backlog complaints by March 2025.

The new Board, Committee and Executive Team have put the following actions (detailed in Appendix 1) to ensure enhancements to the complaints handling approach are achieved:

- A third-party assurance review through David Tolson Partnership (DTP) into consumer standards, including complaints before March 2025 - achieved
- A service review into processes and approach to be started in April/May 2025 – underway
- Moving to one complaint handling system from April 2025 - achieved
- One Policy for the entire new organisation from April 2025 - achieved

At their core these actions are about delivering an effective, prompt and responsive complaints service that addresses from the foundation of a service that consistently meets the Complaint Handling Code. Our self-assessment has identified the following themes of non-compliance (individual points detailed in the self-assessment)

- Consistently achieving timescales;
- Process enhancements so extensions are always agreed with customers;
- Learning from complaints; and
- A positive complaint handling culture

The action plan in place will ensure all areas of the Code will be met by 1 April 2025. We are committed to ensuring that all customers, consistently experience an effective, prompt and responsive complaints handling service. Considerable progress has been made on our action plan with a combined IT system in place and Group wide policy. Whilst our self-assessment for 2024/25 remains with a position of some areas of non-compliance, this progress has seen us move back to fully complying and Quarter 1 2025/26 has seen us achieve 97% of Stage 1 complaints being replied to within the prescribed timescales. The action plan continues to be implemented to ensure we build upon this performance improvement further.

## 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	Complaints and Feedback Policy part 3.1 Training documentation	Both pre-merger organisations used this definition in their Policy. The new Complaints and Feedback Policy uses this at 3.1 and was approved by Board in March 2025.
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	Complaints and Feedback Policy part 2.2 and 3.4 relating to third party and representatives Training documentation	Pre-merger this was included for both organisations and is incorporated into the new policy, approved in March 2025.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	Yes	Complaints and Feedback Policy part 3.2, 3.3 and 5.3 Complaints Procedures	This is included in the new Policy and training and guidance for staff.

	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.		Training documentation	
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	Complaints and Feedback Policy part 2.2 Complaint Procedures Training documentation	The definition of a service request is included within the Policy and training documentation.
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	Complaints and Feedback Policy Survey examples with signposting Website pages	Details on how to make a complaint are clearly available in a number of formats. Surveys are followed up to discuss options with customers, including making a complaint.

## 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	Complaints and Feedback Policy part 5.3 Complaint Case Examples Training documentation	Whist the Policy sets out instances where a complaint may not be taken, each case is considered individually.
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> </ul>	Yes	Complaints and Feedback Policy part 5.3 Procedures Staff training	The policy is clear on reasons. Exceptional cases may still be looked at if older where there is an ongoing issue, for example.

	<ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	Complaints and Feedback Policy part 5.3 Training documentation	Each case will be considered on its merits and discretion shown, such as where an issue may be ongoing.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints and Feedback Policy part 5.3, 5.4 and 5.5 Training documentation Procedures	Policy outlines reasons but each case is considered on an individual basis. Details are available about the Ombudsman service on our website and would be provided if a complaint is not accepted.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints and Feedback Policy parts 5.3, 5.4 and 5.5	Each case is considered in an individual way.

### 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	Complaints and Feedback Policy part 6.1 (ways to make a complaint) and 2.5 and 5.7 on reasonable adjustments Examples of ways customers can complaint Equality Impact Assessment (Wrekin Housing Group)	A number of ways to complain are in place: <ul style="list-style-type: none"> <li>• Telephone</li> <li>• Email</li> <li>• Social media</li> <li>• Writing</li> <li>• In person</li> </ul>
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	Complaints and Feedback Policy part 6.1 Procedure Training documentation	Our process and training are clear to ensure that customers complaints are raised effectively.
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	Yes	As the new merged organisation from January 2025, a new Service Performance and Customer Experience (SPaCE) Committee review:	Volumes of complaints are monitored and considered to balance that too few may indicate customers are facing



	complaint volumes are potentially a sign that residents are unable to complain.		<ul style="list-style-type: none"> <li>• Volumes of complaints, by theme and service area, and how this compares with peers;</li> <li>• Learning themes and action taken;</li> <li>• Tenant Satisfaction Measure results</li> </ul> <p>The Executive Management Team routinely review numbers and themes of complaints.</p>	<p>difficulties to make a complaint. Our focus has been on learning from complaints to enhance customer experience. Following merger, clear governance pathway for complaints performance reporting from January 2025.</p> <p>Member Responsible for complaints chairs the SPaCE committee and sits on the Group Board to provide assurance.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p>Complaints and Feedback Policy Section 6</p> <p>Website information:  <a href="https://www.housingplusgroup.co.uk/about-us/complaints-and-feedback/">https://www.housingplusgroup.co.uk/about-us/complaints-and-feedback/</a>  <a href="https://www.wrekin.com/Pages/Contact-Us/compliment-or-complaint">https://www.wrekin.com/Pages/Contact-Us/compliment-or-complaint</a></p> <p>Complaint letters</p>	<p>Website is accessible to all with accessibility tool. It can also be provided in a range of formats such as large print or translated.</p> <p>The Policy and all information set out the two-stage process and timescales for response.</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>Complaints and Feedback Policy part 8 on Ombudsman details</p> <p>Letters</p>	<p>There are clear links within the policy and procedure of how we will publish the relevant Ombudsman service and also our complaints performance.</p>

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	Complaints and Feedback Policy parts 3.4 and 5.7	We are committed to ensuring customers can have a representative deal with the complaint or support them at meetings.
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	Complaints and Feedback Policy section 8 Website information: <a href="https://www.housingplusgroup.co.uk/about-us/complaints-and-feedback/">https://www.housingplusgroup.co.uk/about-us/complaints-and-feedback/</a> <a href="https://www.wrekin.com/Pages/Contact-Us/compliment-or-complaint">https://www.wrekin.com/Pages/Contact-Us/compliment-or-complaint</a> Complaint letters	All complaint responses from stage 2 advise of the Ombudsman service alongside our website where there is an Ombudsman leaflet and details of how to contact them. In our Retirement living and Shire living schemes there are posters with the details of how to complain and the relevant Ombudsman.

## 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	Team structures Job roles Complaints and Feedback Policy parts 6.11 and 6.12 and Section 9	During 2025/26, at Wrekin Housing Group the Customer Voice and Value will oversee the complaints process, whilst service areas respond to complaints. At Homes Plus Group, a central Customer Advocacy Team oversees the complaints process and responds to all complaints, with a dedicated officer managing all Housing Ombudsman liaison.
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.	No	Complaints Performance Team structures Complaints and Feedback Policy parts 1.2 on principles of complaints handling	Pre-merger work had identified that a backlog of complaints awaiting allocation existed in one organisation (65 at December 2024). From 1 March 2025, there are no complaints awaiting allocation and the action plan (appendix 1) identifies efficiency gains through the use of a new complaints

				<p>management system from April 2025.</p> <p>This improvement to the delivery of the service will ensure performance is maintained, focussing on prompt resolution being consistently achieved.</p> <p>Performance for 2024/25 on Stage 1 complaints responded to within timescales was been 60.6% (Low-Cost Rental Accommodation) and 64.1% (Low-Cost Home Ownership) and for Stage 2 was 57.8% (Low-Cost Rental Accommodation) and 57.1% for Low-Cost Home Ownership). We recognise that this is likely to be Lower Quartile performance. The Board, MRC and Executive see improving performance as a top priority, with a clear action plan in place to ensure this is achieved.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant	No	Staff training Complaints and Feedback Policy parts 1.1 and part 7	Complaints were prioritised as a key workstream through the merger

	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		Training documentation SPaCE Committee reports on complaints performance and learning from complaints (January 2025)	<p>discussions. As a newly merged organisation there are important steps, we are taking to ensure that complaints are consistently replied to within 10 working days (Action Plan Appendix).</p> <p>These actions have delivered results in the first 12 weeks since merger with no complaints backlog in place.</p> <p>A new complaints management system is now in place which has created time efficiencies and further support improved performance since 1<sup>st</sup> April 2025.</p>
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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	Complaints and Feedback Policy part 2.1	Board approved a Policy for all of Housing Plus Group from March 2025.
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	Complaints and Feedback Policy section 6	Two key objectives for the newly merged organisation are: 1) Improved performance on Stage 1 complaints being resolved within timescales; 2) Through the service review, develop the culture of learning from complaints and early resolution further.
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	Complaints and Feedback Policy section 6	A two stage process is in place.
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	Complaints and Feedback Policy section 6	None of our complaints are managed by a third party. Where a complaint is about a contractor the complaint is managed by Housing Plus Group.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints and Feedback Policy section 6	None of our complaints are managed by a third party. Where a complaint is about a contractor the complaint is managed by Housing Plus Group.
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	Complaints and Feedback Policy section 6 Example case files	Contact is made with the complainant to discuss the complaint definition and clarify any points. The complaints management system follows our complaints process and all information can be added/recorded to the complaint. One complaints management system will be used by the whole organisation from April 2025.
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	Complaints and Feedback Policy part 6.3 Example case files	A clear position is explained and outlined.
5.8	At each stage of the complaints process, complaint handlers must:	Yes	Complaints and Feedback Policy part 6.9 Complaint letters Training documentation	The Policy outlines our process, all training provided gives the user the knowledge and

	<ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			understanding of how to manage a complaint.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must <b>agree</b> with the resident suitable intervals for keeping them informed about their complaint.	No	Complaints and Feedback Policy part 6.5 and 6.8 Examples of letters	<p>Before the merger, where one landlord had a backlog of complaints awaiting allocation, extensions were not always agreed with customers.</p> <p>Removing the backlog has been a key priority and achieved by 1 March 2025. All extensions will now be agreed with customers and the extension of one complaints system to the whole Housing Plus Group will ensure this is routinely recorded in one central place. This will move us to a position of compliance from 1 April 2025.</p>



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	Complaints and Feedback Policy part 2.5 EDI Strategy Training documentation	Both pre and post-merger we are compliant with this part. The service review will look to strengthen this further.
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	Complaints and Feedback Policy part 6.5 Procedure Examples of letters	Policy outlines position and individual cases show escalations handled in accordance with this.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Complaints and Feedback Policy section 6 System screenshots Case files	Compliant but the move to one complaints management system for the whole organisation will further strengthen this from April 2025.
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	Yes	Complaints and Feedback Policy part 1.2 and section 6 Compensation Policy Procedures Staff training	Staff are empowered to look for reasonable remedies at all stages. As a merged organisation, a key objective is to ensure we meet the

	at any stage of the complaints process without the need for escalation.			prescribed timescales for complaint resolution in a consistent manner. This will ensure early remedy wherever possible.
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	Complaints and Feedback Policy part 5.3 Acceptable behaviour procedures	Unreasonable behaviour procedure is accessible. This is done in a small minority of cases and all actions are carefully considered.
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	Complaints and Feedback Policy part 5.3 Examples of policy application Homes Plus: Unreasonable Complainants Behaviour Policy	Unreasonable behaviour procedure is accessible. This is done in a small minority of cases, and all actions are carefully considered.

## 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.	No	Complaints and Feedback Policy part 5.5 and 5.6 Procedure SPaCE Committee reports on complaints performance and learning from complaints.	<p>As part of the due-diligence work prior to merger, the Complaints Service was identified as a key focus area that required significant attention in regard to performance and compliance with this code. A service improvement plan was developed pre-merger, to improve the combined position by year end (24/25), in order to provide assurance that 2025/26 would commence with a strong compliance position, improving the service for our customers and compliance with the Complaint Handling Code.</p> <p>The actions taken to remove the backlog of complaints awaiting allocation and move to one complaints</p>

				management system will give a strong foundation to achieve consistently strong performance against early resolution of complaints.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <b><u>within five working days of the complaint being received.</u></b>	No	Complaints and Feedback Policy section 6 Procedure SPaCE Committee reports on complaints performance and learning from complaints.	<p>Pre-merger it was identified through due diligence that one of the legacy organisations had a number of stage 1 complaints awaiting allocation to an officer and were outside of the five day target for acknowledgement. This position has impacted compliance with this element of the code. An improvement action plan was developed pre-merger to remedy this position</p> <p>The action plan is designed to ensure compliance by 1 April 2025. The efficiency savings from one</p>

				<p>complaints management system will ensure more flexibility moving forward also; ensuring sustained adherence to the Code.</p> <p>From February 2025, the legacy organisation reported a compliant position in regard to this element of the code.</p>
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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.	No	Complaints and Feedback Policy Section 6 Procedure SPaCE Committee reports on complaints performance and learning from complaints.	<p>The Board and Executive Team and MRC are committed to ensuring that this changes quickly; ensuring customers are consistently receiving a prompt service.</p> <p>The action plan put in place will ensure strong foundations, such as creating resource capacity using one complaints management system. The impact of this work is already being seen with the backlog of complaints now gone.</p> <p>We will remain vigilant and use the service review and third-party assurance to offer further challenge to our approach.</p>
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				Performance for 2024/25 on Stage 1 complaints responded to within timescales was been 60.6% (Low-Cost Rental Accommodation) and 64.1% (Low-Cost Home Ownership) and for Stage 2 was 57.8% (Low-Cost Rental Accommodation) and 57.1% for Low-Cost Home Ownership). We recognise that this is likely to be Lower Quartile performance.
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.	No	Complaints and Feedback Policy part 6.5 and 6.7	<p>The action plan in Appendix 1 will ensure that in the majority of instances complaints are resolved within 10 working days.</p> <p>Process efficiency savings through one complaints management system will increase capacity and ensure targets are consistently met. This will reduce the need to extend complaints.</p>
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.	No	Complaints and Feedback Policy part 6.5, 6.6, 6.7 and 6.8	Contact details of the Housing Ombudsman are included in letters sent to the customer. This

				<p>information can also be found in the policy and website.</p> <p>The complaints management system for the entire organisation will ensure a prompt to include Housing Ombudsman details within extensions.</p>
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	<p>Complaints and Feedback Policy part 6.7</p> <p>Governance oversight through the SPaCE Committee mean focus is kept on ensuring complaints area responded to promptly and not after actions are complete.</p>	We do this through letters and actions are managed through housing management systems.
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	<p>Complaints and Feedback Policy part 6.6, 6.7 and 6.9</p> <p>Procedure</p> <p>Complaint Letters</p> <p>Complaints Checklist</p>	All of our response letters clearly indicate the complaint issues, the complaint remedies, policies that are relevant, any signposting to other services, and learning outcomes. The response also includes if we are upholding the complaint.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related	Yes	<p>Complaints and Feedback Policy part 6.7</p> <p>Procedure</p> <p>Letters</p>	We would take a case-by-case basis. Where a new issue occurs after the stage 1 response, we will advise



	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.			the customer that a new complaint ensures they have two chances for their case to be considered, for example.
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	Complaints and Feedback Policy part 6.9 Procedure Letter templates Example letters	All of our response letters clearly indicate points a-g.

### 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	Yes	Complaints and Feedback Policy section 6 Procedure Letters	Our process is to escalate where customers ask us to.

	2 of the landlord's procedure. Stage 2 is the landlord's final response.			
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.	No	Complaints and Feedback Policy section 6 Procedure Letters	<p>The pre-merger due diligence work identified that compliance on this step was not being achieved. The backlog now being resolved is a central part of this, and efficiencies through a complaints management system will increase capacity from April 2025.</p> <p>Performance for 2024/25 on Stage 1 complaints responded to within timescales was been 60.6% (Low-Cost Rental Accommodation) and 64.1% (Low-Cost Home Ownership) and for Stage 2 was 57.8% (Low-Cost Rental Accommodation) and 57.1% for Low-Cost Home Ownership). We recognise that this is likely to be Lower Quartile performance.</p>
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes	Complaints and Feedback Policy part 6.5 Procedure	We ask customers why they remain unhappy, but this is

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		Letters	done after the stage 2 has been raised.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints and Feedback Policy Section 6 Procedure	Cases are always reviewed at Stage 2 by a different person.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	No	Complaints and Feedback Policy section 6 Procedure Performance data reported to Board and Committee	A service improvement plan was developed pre-merger following identification that complaints performance in one of the legacy organisations was not compliant with this element of the code. Initial actions have removed any backlog of complaints awaiting allocation and a complaints management system from April 2025 will ensure this performance is consistently achievable.
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,	No	Complaints and Feedback Policy part 6.5 and 6.8 Procedure Performance oversight through routine reports to SPaCE and Executive Management Team.	Pre-merger in one of the landlords, a backlog of complaints awaiting allocation had been in place.

	and the reason(s) must be clearly explained to the resident.			<p>Therefore, all extensions were not always for a reason beyond our control.</p> <p>An action plan was agreed before the merger, designed to ensure that performance improves. Initial indications are that this is being achieved, for example, the backlog has been removed.</p>
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.	No	<p>Complaints and Feedback Policy Procedure part 6.5 and 6.8</p> <p>Number of complaints reaching each stage, including the Ombudsman is reported through the SPaCE Committee and reporting to Executive Management Team.</p>	<p>Ombudsman details are on the website and all complaint response letters.</p> <p>A system prompt to ensure this consistently is included will be introduced from May 2025.</p>
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>Complaints and Feedback Policy part 6.6</p> <p>Procedures</p> <p>Complaint letters</p> <p>Training documentation</p>	<p>Responses are sent once the answers are known.</p> <p>Actions are tracked through systems.</p>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	<p>Complaints and Feedback Policy part 6.9</p> <p>Procedures</p>	<p>All of our response letters clearly indicate the complaint issues, the</p>

	decisions, referencing the relevant policy, law and good practice where appropriate.		Letter examples Checklist for responses Template letters Training documentation	complaint remedies, policies that are relevant, any signposting to other services, and learning outcomes.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ol 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 any remedy offered to put things right;</li> <li>details of any outstanding actions; and</li> <li>details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ol>	Yes	Complaints and Feedback Policy part 6.9 Procedures Letter examples Checklist for responses Template letters Training documentation	All complaint letters cover these core components.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints and Feedback Policy section 6 Procedures Letter examples Checklist for responses Template letters Training documentation	Stage 2 responses are issued by more Senior colleagues or those that specialise in Stage 2 responses.

## 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> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Complaints and Feedback Policy section 6 and part 6.10 Procedures</p> <p>Complaint letters</p> <p>Checklist</p> <p>Template letters</p> <p>Training documentation</p>	All complaint letters set out these things. This is further supported through compensation guidance, taking best practice from the Ombudsman Service.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Complaints and Feedback Policy section 6 and part 6.10 Compensation Policy</p> <p>Compensation Matrix</p>	All resolutions consider this, and learning is built from the Ombudsman guidance in this area.
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	<p>Complaints and Feedback Policy section 6 and part 6.10 Compensation Policy</p> <p>Compensation Matrix</p> <p>Letters</p>	Contained within our response letters. Staff are expected to consider this and training provided to build understanding.

			Templates Checklist	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints and Feedback Policy 6.10 Compensation Policy Compensation Matrix Letters Templates Checklist	This is embedded in relevant documents and therefore decisions.

## Section 8: Putting things right

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.	Yes	Self-assessments from Homes Plus and Wrekin Housing Group  Post merger the SPaCE Committee routinely scrutinise: <ul style="list-style-type: none"> <li>complaints performance by theme, service area</li> <li>Learning areas and actions taken</li> <li>Benchmarking with other landlords</li> </ul>	2023/24 Complaints performance and Service Improvement Reports published on website.  After the merger this will be reported to the SPaCE Committee and final approval at Board.  Member Responsible for Complaints assurance at Group Board for final performance review and approval.  2024/25 published providing a Group performance position with Boards oversight, approval and response and published on the Group website.



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	Prior to merger these were reported to the respective Governing bodies.  Post merger this will report to the SPaCE Committee and to Board after this.	This was reported to the SPaCE report in July 2025 and Board in September ahead of publication by 30 September 2025.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Self-assessment  This submission.  Board approval and minutes	This self-assessment document was submitted to the Housing Ombudsman in March 2025.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	This has not been requested	This has not been requested
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	This has not occurred	This has not occurred

### 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	Complaints and Feedback Policy section 7 Procedure Training documentation Reports to SPaCE Committee on learning from complaints	From April 2025 complaints will be managed through one complaints management system. This will ensure learning themes are consistently captured and used.  Learnings reported to governing body as part of complaints performance on a quarterly basis.
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.	No	Complaints and Feedback Policy section 7 Procedure Reports to SPaCE Committee on learning from complaints.	We recognise with lower quartile performance on complaints being handled within timescales that it is imperative that we improve this performance, driven by a positive complaint handling culture.  As a newly merged organisation, two cultures are being brought together. A clear focus on being customer centric was seen in the vision for the new

				<p>organisation. This is seen in the actions in the improvement plan (Appendix 1)</p> <p>The positive progress seen since the merger has shown the improvements made.</p>
9.3	<p>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.</p>	Yes	<p>Complaints and Feedback Policy section 1 and 7</p> <p>SPaCE reports on complaints and learning from complaints</p> <p>Website reports from both organisations' pre-merger</p>	<p>Reported on websites and to customer and staff groups. Complaints performance reporting to SPaCE committee providing assurance to the Group Board via our Member Responsible for complaints.</p> <p>Complaints Performance and Service Improvement Reports, published on websites.</p>
9.4	<p>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.</p>	Yes	<p>Complaints and Feedback Policy section 9</p> <p>Governance reports</p>	<p>Compliant – this person is Jan Lycett, Executive Director of Integration and Change</p>
9.5	<p>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</p>	Yes	<p>Complaints and Feedback Policy section 9</p> <p>Governance reports</p>	<p>Compliant, this person is Kevin Morgan, Chair of the SPaCE Committee and Board Member until July</p>

				2025 and Sarah Watson from September 2025.
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	is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Complaints and Feedback Policy section 9 SPaCE Committee reports and Board performance metrics	MRC is chair of the Service Performance and Customer Experience Committee (customer led), where complaints performance is reported. Monthly meetings with relevant staff who manage the complaints service are taking place.
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.	Yes	As above	Following merger in January 2025, complaints performance forms part of the governance framework via the Service Performance and Customer Experience Committee, with MRC attendance.  Monthly complaints performance meetings with MRC in progress.

9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <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>	Yes	<p>Staff training documentation Complaints and Feedback Policy section 1</p>	<p>Clear objectives that focus on collaboration, collective responsibility and professional standards are embedded in training.</p>
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