

2023 / 2024 Complaint Handling Code Self-Assessment

Appendix A: Self-assessment form

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

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this. Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own employees, or those acting on its behalf, affecting a resident or group of residents.’</p>	Yes	<p>This definition is provided in policy at Section 1.3 under ‘What is a complaint?’, has been outlined in engagement sessions that have run with more than 50 managers from all areas of the business, and will be available for customers in the Policy and Procedure published on the WDH website.</p>	
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted through a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>This is evidenced in the policy within Section 1.3, which explains that a complaint is an expression of dissatisfaction, however made. It has been explained and promoted in engagement sessions that have run with more than 50 managers from all areas of the business and will be available for customers in the Policy and Procedure published on the WDH website. All complaints submitted are handled in line with our Complaints Policy and Procedure.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	WDH recognises the difference between a service request and a complaint and sets the definitions of these terms out in Section 1.3 of our Complaints Policy. These definitions are available to customers in the policy and the Guide to Complaints, which is available on the WDH website and is sent out to customers with Stage 1 acknowledgement letters. Service requests are recorded, monitored and reported to the Member Responsible for Complaints monthly and the Customer Committee quarterly, and as part of annual reporting. This information will also be reported annually to within WDH's annual complaints performance and service improvement report. This information will be shared with the Customer Committee and Board and published on our website.	Training about how to recognise and respond to service requests and complaints has been delivered to more than 50 WDH managers from across the business to ensure employees understand the difference between a complaint and a service request and can best support tenants. Managers will promote the new policy and procedure within their own teams and among new starters in their teams, and the Customer Relations team provide team and / or individual training sessions whenever needed.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	This is evidenced in the policy at Section 1.3.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	A guide to complaints that was tested by customers from WDH's Customer Panel to ensure the information is clear and accessible is available on our website and for customers to access, this is provided in surveys to ensure that customers can easily navigate how to complain. Expressions of dissatisfaction made during surveys are also provide an opportunity for WDH to put things right and learn from dissatisfaction. The Customer Insight team offers dissatisfied survey respondents the opportunity to provide their contact details so that they can be contacted by the appropriate WDH to support them. The Customer Insight team triages instances of dissatisfaction and sends them to the relevant teams to address with the customer so that things can be put right. The WDH website has recently been updated to ensure the Complaints Policy, Procedure and web form for reporting are easily accessible.	

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	WDH accepts all complaints that fall within the scope of its Complaints Policy. Each complaint is assigned to a complaints officer that is the most appropriate and knowledgeable person at the time, to ensure that the complaint is considered on its own merits. As in Section 2.9 of the Complaints Policy, where a complaint cannot be considered or is to be dealt with in an alternative way, we advise the customer of our decision and the reasons for this. Where appropriate they are given details of the HOS, Building Safety Regulator (BSR) or other regulatory body. We will comply with any instruction from the HOS or BSR to enter a complaint into our Complaints Procedure.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>All complaints are accepted other than those set out in Section 2.8 of the Complaints Policy, which fall outside the scope of the policy. These exclusions have been reviewed and agreed by WDH's Customer Committee. Exclusions have been discussed in detail and provided to colleagues in engagement sessions to ensure that exclusions are understood.</p>	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>WDH accepts all complaints referred within 12 months taking into account the individual circumstances around any complaints submitted after this period. We accept complaints beyond 12 months where there is a good reason to do so.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 are responded to in writing with the guide to complaints attached. The guide to complaints outlines the information for the Ombudsman. Information is available on the website with an explanation of the HOS.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This can be found in the policy under at Section 2.9.	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Complaints can be made to any employee and all teams have had access to engagement sessions to ensure they understand how to best respond where something has gone wrong. Going forwards, team managers will be responsible for promoting the new policy and procedure within their teams. The Customer Relations team will also provide training sessions for any individual or team on request as needed. Complaints can be made by talking to our employees, over the phone, in writing, through the website or on social media. Customers who make a complaint using social media will be privately messaged to ensure we their privacy is protected in line with data protection regulation. As per Section 1.4 of our Complaints Policy, complaints are managed in line with data protection legislation and our Equality, Diversity and Inclusion Policy. This is available on the WDH website at https://www.wdh.co.uk/media/zbahfd53/wdh-documents_publications-library_corporate-documents_equality-diversity-and-inclusion-policy.pdf and ensures everyone who comes into contact with us, including employees, customers and stakeholders, understands our commitment to equality, diversity and inclusion and to fair treatment and respect for everyone. As per page 2 of our Complaints Procedure, we make reasonable adjustments under the Equality Act 2010 wherever possible to accommodate our customers' needs and keep a record of these.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.2	Residents must be able to raise their complaints in any way and with any employee. All employees must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>As above, complaints can be made to any employee and managers from all teams have had access to engagement sessions to ensure they understand how to best respond where something has gone wrong. Complaints cases will be passed to the appropriate team and response times monitored through WDH's new complaints case management system. Complaints can be made by talking to our employees, over the phone, in writing, through the website or on social media. Customer preferences in relation to communication channels are considered wherever possible. Managers from all areas of WDH have received training in relation to the Complaints Process and Procedure in May and June 2024, and resources are available for all employees about how to manage complaints, including a frequently asked questions (FAQ) document that gives clear guidance in relation to common queries. As part of delivering its ongoing Tenant Survey Action Plan, which plans to improve services in line with feedback from its annual customer survey, WDH will also be rolling out area based training to all customer facing employees to ensure they know how to:</p> <ul style="list-style-type: none"> • accurately record service requests and complaints; • use active listening to recognise a complaint (as opposed to a service request and are empowered to respond sensitively and with empathy; and • ensure clarity about what is a service request and what is a complaint. 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	A positive complaints culture has been promoted through the organisation through training sessions with more than 50 managers in May and June 2024, through the new policy and procedure, through the Guide to Complaints and through updates to the employee Hub, emphasising how we can learn from complaints and see these as a positive way to improve services for our customers.	
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	Our Complaints Policy is available on the website and details the two-stage process (Section 2.13 of the Complaints Policy), what will happen at each stage (Section 2.15 of the policy), and the timeframes for responding (Sections 2.13, 2.17, 2.20, 2.23 and 2.25). Alternative formats are available where needed. An additional short guide to complaints is also on the WDH website and sent to customers with complaint acknowledgement letter. The approach to the guide has been tested with customers to ensure the information is clear and accessible.	
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	Section 1.5 of the Complaints Policy outlines where and how WDH will publicise the policy via our communications channels, when asking for customer feedback and to all employees. The policy will be displayed prominently in higher risk buildings to inform customers, residents and building users. The Complaints Policy will also be publicised from time to time in communication with our customers and will include contact details for the HOS, the Building Safety Regulator (BSR) and Financial Conduct Authority (FCA).	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Our policy (Section 2.7) and procedure explain that tenants may be represented by a third party or advocate.	
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	This information is available in the guide to complaints, in the written responses to complaints and on the website.	

Section 4: Complaint Handling Employees

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	The customer relations team is responsible for complaints and led by a Complaints Manager who discharges the duties of the 'Complaints Officer' as set out in the HOS Complaint Handling Code. Our executive Director of Resources has oversight of complaint handling and an MRC has been in place with responsibility for complaints to support a positive complaint handling culture.	
4.2	The complaints officer must have access to employees at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Complaints Officer, WDH's Complaints Manager, has access to employees at all levels to facilitate the prompt resolution of complaints. The Complaints Officer and Customer Relations team have the authority and autonomy to resolve disputes and put things right promptly and fairly.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant employees must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p>Complaint handling engagement sessions have been delivered to more than 50 managers and team leaders to ensure that the positive culture and learning from complaints can be filtered throughout all levels of employees. These have been delivered by the Customer Relations team and Service Director.</p> <p>Sessions were arranged to introduce the Code, our policy and our new complaints handling case management system. Employees from WDH's Housing, Repairs, Assets, and Corporate Services service areas.</p> <p>Managers are promoting a positive complaints culture, the new Code, our Policy and Procedure to their wider teams, and ongoing training will be provided to support the roll out of our new complaints case management system, which will launch in June 2024. In the interim, preparations for the new system are being made, and all complaints being logged dating back to April 2024 will be migrated to the new system once it launches.</p>	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	All other relevant policies have been dissolved and a new Complaints policy has been introduced to ensure that we have a single policy for complaints covered by the code.	
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	A two-stage process is in place. The process can be found in the policy in Section 3.0.	
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	The policy indicates the two-stage process which can be found from 3.0. Colleagues have been informed in detail about the benefits of a two-stage process, and the new complaints case management system has been developed to support delivery of the two-stage process.	
5.4	Where a landlord's complaint response is handled by a third party (for example, 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	All complaints are handled by WDH in line with our Complaints Policy and Procedure. No third parties handle complaints on WDH's behalf.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	All complaints are handled by WDH in line with our Complaints Policy and Procedure, which is compliant with the HOS Complaint Handling Code.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Lines of communication will be kept open throughout the process to ensure all parties understand and can come to a timely resolution. This can be found in the ‘Stage 1 complaints’ and ‘Stage 2 complaints’ sections at page 2 and page 5 of the Complaints Procedure.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	This is highlighted in the policy and the process colleagues will follow. This can be found in the policy from 3.0.	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	This is highlighted in the policy under ‘Stage 1 complaints’ and ‘Stage 2 complaints’ where this indicates the processes that will be followed by WDH employees. This has been delivered to employees in engagement sessions.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Actions in relation to complaints that may need to be extended beyond the timescales set out in the code are at page 4 and page 5 of the procedure and Sections 2.18 and 2.25 of the policy and have been featured in the employee engagement sessions around complaint handling to ensure the understanding is cover. Extensions by WDH are only made in exceptional circumstances and in agreement with the customer.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	This is tracked through our complaints handling case management system and can be updated by colleagues to ensure that consistency is kept throughout. All reasonable adjustments are recorded and can be reviewed as needed. These will be reported in the monthly performance report for the Corporate Management Team and Member Responsible for Complaints, in the quarterly complaints report to Customer Committee and as part of the annual performance report.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in Section 2 of this Code.	Yes	This is indicated within the policy, exclusions can be found at 2.2 of the policy and through training with colleagues.	
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	A new complaints case management system has been designed that tracks all stages of a complaint, details all correspondence, and can be utilised to look at trends for learning from complaints. This will launch in June 2024.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	This is indicated in the Complaints Policy from 7.0 and has been provided during training sessions in relation to the new policy and procedure. Managers can provide guidance in relation to remedies within their own teams and / or the Customer Relations team provides guidance on request and through the Complaints section of the Employee Hub.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	An Unacceptable Behaviour Protocol is in place to protect tenants and employees and support positive communication and resolution of complaints, as referenced in the policy at Section 2.10. Information in relation to the Unacceptable Behaviour Protocol is also available in a clear and accessible manner in the Guide to Complaints on the WDH website.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<p>As per our Complaints Procedure and policy at Section 2.10, customers who are subject to restrictions under our Unacceptable Behaviour Protocol are advised on how they can raise complaints with us.</p> <p>In line with the Equality Act 2010 and our Equality, Diversity and Inclusion Policy, we make reasonable adjustments wherever possible and keep a record of these.</p>	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most Stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Section 2.12 of the Complaints Policy sets out that WDH aims to resolve all issues locally at the earliest available opportunity. Complaints are triaged by the Customer Relations team. As per the Complaints Procedure, the Customer Relations team will acknowledge all complaints with a letter that advises the customer of: The acknowledgement letter is recorded on the system for logging complaints and will advise the customer of:</p> <ul style="list-style-type: none"> • The need to check the basis of the complaint and resolution and notify us if any changes are necessary. • Details of who will be investigating the complaint. • A timescale for the investigating officer to contact them. • A timescale for a response or if an extension is needed and the reason for this. • Whether we feel the resolution requested is unreasonable, disproportionate or cannot be provided, to ensure their expectations are managed. 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<ul style="list-style-type: none"> <li data-bbox="1137 161 1608 746">• If the complaint relates to a building safety risk in a higher risk building, whether or not it has been accepted as a 'relevant complaint' by the Principal Accountable Person (WDH). If it has not been accepted as a 'relevant complaint', reasons will be given for the decision and the complainant will be informed of their right to take their issue to the Building Safety Regulator for the final determination. <li data-bbox="1137 767 1608 1058">• Provide details of the Housing Ombudsman Service, or the Building Safety Regulator if related to a building safety risk in a higher risk building, should the customer wish to obtain advice or support. 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.2	Complaints must be acknowledged, defined and logged at Stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	This is highlighted in the policy at Section 2.13, has been communicated through employee training and is available for customers through the published Policy and Procedure and the Guide to Complaints.	
6.3	Landlords must issue a full response to Stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	This is highlighted in the policy at Section 2.17.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason and the reason(s) must be clearly explained to the resident.	Yes	This is highlighted in the policy at Section 2.18. Colleagues understand that extensions are only made in exceptional circumstances and in agreement with the customer.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Actions in relation to complaints that may need to be extended beyond the timescales set out in the code are at page 5 of the procedure and sections 2.18 of the policy and have been featured in the employee engagement sessions around complaint handling to ensure the understanding is covered. Extensions by WDH are only made in exceptional circumstances and in agreement with the customer.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Page 6 of the Procedure outlines that all Stage 1 responses will be provided when the answer to the complaint is known, not when any outstanding actions required to address the issue are completed.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is outlined on page 5 of the Procedure, which outlines what is contained in Stage 1 decision letters and 2.27 of the Policy, which states that all communication with the customer will be in plain English ensuring decisions are clear and easy to understand.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the Stage 1 response if they are related and the Stage 1 response has not been issued. Where the Stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This is highlighted in the policy under 'Stage 1 complaints', through colleague training and available for customers.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of Stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response. 	Yes	<p>As per page 5 of the Complaints Procedure, on completion of the Stage 1 investigation the customer receives a Stage 1 decision letter, in clear, plain language detailing;</p> <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on the complaint; • the reasons for any decisions that have been made; • the detail of any remedy offered to put things right; • explanations of technical language used, or with plain language summaries of complex or technical provisions; • details of any outstanding actions; • timescales for any outstanding actions to begin and be completed; • details of how to request a re-consideration of the Stage 1 response if relating to a building safety risk in a higher risk building; and • details of how to escalate the matter to Stage 2 if the customer is not satisfied with the response. 	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at Stage 1, it must be progressed to Stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	This is highlighted in the policy under 'Stage 1 complaints' and 'Stage 2 complaints', through colleague training and available for customers.	
6.11	Requests for Stage 2 must be acknowledged, defined and logged at Stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	This is outlined at Section 2.23 of the policy.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.12	Residents must not be required to explain their reasons for requesting a Stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its Stage 2 response.	Yes	Residents are not required to provide a reason for requesting a stage 2 consideration. As per pages 5 to 6 of the Complaints Procedure, Stage 1 complaint outcome letters contain the details of who customers can contact to discuss if they are unhappy with the content of the letter or outcome of their complaint. This keeps a line of communication open for the customer to allow WDH to understand why they are unhappy. If a resident wishes to request Stage 2 consideration, they receive an acknowledgement letter advising of the need to check the basis of the complaint and resolution and notify WDH of any changes. This provides the opportunity for the investigating manager to contact the tenant and discuss their complaint to understand why they remain unhappy.	
6.13	The person considering the complaint at Stage 2 must not be the same person that considered the complaint at Stage 1.	Yes	This is highlighted on page 6 of the Complaints Procedure under 'Stage 2 complaints', has been explained to employees through training and is available for customers in the published Procedure. The Stage 2 complaint would be investigated by the customer relations team.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.14	Landlords must issue a final response to the Stage 2 within 20 working days of the complaint being acknowledged.	Yes	<p>This is highlighted on page 6 of the Complaints Procedure under 'Stage 2 complaints' and has been promoted through colleague training and available for customers.</p> <p>Customers also have an additional 20 working days to decide if they are satisfied or dissatisfied with the outcome once the investigation is completed.</p>	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>This is highlighted at page 6 of the Complaints Procedure under 'Stage 2 complaints' and has been promoted through colleague training and available for customers.</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.	Yes	<p>Actions in relation to complaints that may need to be extended beyond the timescales set out in the code are at page 6 of the procedure and sections 2.25 of the policy and have been featured in the employee engagement sessions around complaint handling to ensure the understanding is cover.</p> <p>Extensions by WDH are only made in exceptional circumstances and in agreement with the customer.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Page 6 of the Procedure states that Stage 2 responses will be provided when the answer to the complaint is known, not when any outstanding actions required to address the issue are completed.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	WDH addresses all points raised in complaint definitions, providing clear reasons for any decisions and referencing the relevant policy, law and good practice where appropriate in a clear an accessible way.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of Stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>On completion of a Stage 2 complaint, residents receive a clear and accessible letter explaining in plain English:</p> <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on all points of the complaint definition; • the reasons for any decisions that have been made, referencing the relevant policy, law and good practice where appropriate; • the details of any remedy offered to put things right; • details of any outstanding actions; and • details of how to escalate the matter to the Housing Ombudsman Service if the individual remains dissatisfied. 	
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable employee members needed to issue such a response.</p>	Yes	<p>Page 6 of the Procedure outlines that the Stage 2 decision letter will be our final response and will include details of how to escalate the complaint to the HOS or the Building Safety Regulator if relating to a building safety risk in a higher risk building if the customer remains unhappy with the decision.</p>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • apologising; • acknowledging where things have gone wrong; • providing an explanation, assistance or reasons; • taking action if there has been delay; • reconsidering or changing a decision; • amending a record or adding a correction or addendum; • providing a financial remedy; and • changing policies, procedures or practices. 	Yes	<p>This is highlighted in the policy under 'putting things right', through colleague training and available for customers.</p> <p>Colleague engagement sessions outlined in-depth the remedies that can be offered and how communication is key to ensure customers feel supported and listened to. Ongoing training will be provided by managers for their teams and refresher training can be requested from the Customer Relations team by individuals or teams at any time.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Sections 2.30 and 2.31 of the policy outline that when determining an appropriate and proportionate remedy we will take several factors into consideration to ensure any redress offered adequately reflects the individual circumstances of the complaint.</p> <p>A range of remedies will be available and any offers of redress will be fair, appropriate and proportionate to the complaint.</p>	
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	This is highlighted in the policy under 'putting things right' from Section 2.28 to 2.36.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	AS at Section 2.34 of the Policy.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>An annual performance report is currently produced and reported to the Customer Committee. This will be enhanced when sufficient data is available from Our complaints handling case management system to ensure trends and learning points can be obtained.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The annual performance report is presented to the Customer Committee that is chaired by the MRC and then the Board. The governing body's response to the report is published alongside the annual report on the website	Add link to annual report and response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and / or change in procedures.	Yes	Following any restructure, merger or other significant, relevant change, this will be complied with.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Following any HOS investigation a self- assessment will be reviewed and updated where required.	
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	If WDH is unable to comply with the Code we will inform HOS, contact any affected customers and provide a timescale for returning to compliance.	

Section 9: Scrutiny and 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	Through training for employees – those receiving complaints understand that the aim is to utilise data to learn from complaints and improve services for customers. As per Section 1.1 of our Complaints Policy, we recognise that every complaint offers us an opportunity to learn and improve our services to customers. Service improvements will be reported to customers through the Customer Committee and WDH newsletter.	Add link to Complaints Policy
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	The overall purpose of WDH's Complaints Policy is to ensure a positive complaints culture and process that supports a strong relationship between WDH and its customers and enables things to be put right when they have gone wrong. The policy also identifies areas of learning for the business so it can develop and improve services, while meeting the requirements of the Code, the Building Safety Act 2022 and the Financial Conduct Authority.	Add link to Complaints Policy

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, employees and relevant committees.	Yes	Learning from complaints and improvements made as a result will be reported monthly to the MRC, quarterly to our Customer Committee and in the annual complaints performance and service improvement report, which will be reported to the HOS.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	WDH's Executive Director of Resources is accountable for complaints handling, including assessing themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. Reporting tools available as part of the new complaints case management system will support accurate recording of information and identification of themes and trends. This information will be shared with the MRC monthly.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Member Responsible for Complaints has been appointed.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.6	<p>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 employees to perform this role and report on their findings.</p>	Yes	<p>This is highlighted in the policy, through colleague training and available for customers.</p> <p>The MRC has meetings to look at complaints and supports in creating a positive culture for complaints.</p> <p>Complaints performance also forms part of the Customer Insight Report that is presented and discussed at each Board meeting.</p>	Add link to Complaints Policy
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>The MRS will receive monthly updates on complaints performance, including outcomes from complaints and the volume of complaints. The MRC, along with the Executive Lead for Complaints and the Complaints Officer, will regularly review issues and trends, stay up to date with findings from HOS investigations and the wider external environment. The MRC will also receive the Annual Complaints Performance and Service Improvement Record, which will be reported to the Customer Committee and Board and published for customers.</p> <p>Complaints performance also forms part of the Customer Insight report that is presented and discussed at each Board meeting.</p>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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> <ol style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>Enabling a positive and collaborative culture internally and between WDH and Customers is at the heart of the Complaints Policy with the aim of enabling things to be put right. Section 2.14 of the Complaints Policy outlines how employees handling complaints will:</p> <ul style="list-style-type: none"> • have the authority and autonomy to act to resolve disputes promptly and fairly; • have access to employees at all levels to facilitate the prompt response to complaints; • act sensitively and fairly towards the customer; and • be trained in the importance of complaint handling and to receive complaints and support distressed and upset customers. <p>As set out in the Complaints Procedure, we value all complaints as they offer us an opportunity to learn and improve.</p>	Add link to Complaints Policy and Procedure

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>All employees and managers are responsible for ensuring actions taken on complaints are recorded and monitored.</p> <p>Managers are responsible for the quality assurance of complaints and responsible for any follow up action and arrangement of any redress offered.</p>	