

# GGA Self-Assessment: Housing Ombudsman Service 2024 Code

**Date: June 2025**

## 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                                                                                                                                                                                    |
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| 1.2            | A complaint must be defined as:<br><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 Policy | We have adopted the Ombudsman's definition and our policy reflects this.                                                                                                                                    |
| 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 Policy | This is made clear within our Complaints Policy. Our complaint definition in our policy details what we consider to be a complaint when our customer is unhappy with a service they have/have not received. |
| 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              | Complaints Policy | This is made clear within our Complaints Policy.                                                                                                                                                            |
| 1.5            | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if                                                                                                                                                                                                                           | Yes              | Complaints Policy | This is made clear within our Complaints Policy. Should a resident express                                                                                                                                  |

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|     | the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.                                                                                                                                                                                                               |     |                   | dissatisfaction with a response to a service request a complaint will be raised and actions to address the service request will continue. |
| 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 Policy | This is made clear within our Complaints Policy.                                                                                          |

## Section 2: Exclusions

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Comply: Yes / No | Evidence          | Commentary / explanation                                                          |
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| 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 Policy | This is made clear within our Complaints Policy.                                  |
| 2.2            | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul> | Yes              | Complaints Policy | This is made clear within our Complaints Policy. The exclusions have been listed. |
| 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                                                                                                                                                                                                                                                                                                            | Yes              | Complaints Policy | This is made clear within our Complaints Policy.                                  |

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|     | good reasons to do so.                                                                                                                                                                                                                                                                                                                                                             |     |                   |                                                  |
| 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 Policy | This is made clear within our Complaints Policy. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.                                                                                                                                                                                                                                             | Yes | Complaints Policy | This is made clear within our Complaints Policy. |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                                                                                                                                                   | Commentary / explanation                                                                                                        |
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| 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 Policy                                                                                                                                                          | Residents can complain through a number of different channels.                                                                  |
| 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 Policy                                                                                                                                                          | This is made clear within our Complaints Policy.                                                                                |
| 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              | Whilst we monitor the total number of complaints, we do not measure this against a targeted performance as we recognise that a high volume of complaints are not negative. | Live complaints are discussed at least fortnightly with the Managing Agent. Alongside this complaints are reported to Trustees. |
| 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                                                    | Yes              | Complaints Policy                                                                                                                                                          | See web link to our complaints policy.                                                                                          |

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|     | landlord's website.                                                                                                                                                                      |     |                                                                                        |                                                                                |
| 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 | Complaints Policy                                                                      | This is made clear within our Complaints Policy.                               |
| 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 Policy                                                                      | This is made clear within our Complaints Policy.                               |
| 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 | See website for Complaints Policy and to find details of the Housing Ombudsman service | This information is available on our website and on all Stage 1 & 2 responses. |

## Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                                                                       | Commentary / explanation                                                                                                                                       |
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| 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              | Managing Agent – Operations Manager                                                            |                                                                                                                                                                |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.                                                                                                                     | Yes              | Managing Agent – Operations Manager                                                            | Our complaint handlers are appropriately trained and are committed to resolve our residents' complaints quickly and fairly in line with the Complaints Policy. |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively                            | Yes              | Access to online learning through HOS that demonstrates some of the learning and improvements. | Our complaint handlers are appropriately trained and are committed to resolve our residents' complaints quickly and fairly in line with the Complaints Policy  |

## 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 Policy | Residents are not treated differently if they complain.                                                                                                                                                                                                                                                                                                             |
| 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 Policy | GGA has a two-stage complaint process. This is made clear within our Complaints Policy. We will always work to resolve a resident's concern as quickly as we can. When something has gone wrong, we will proactively seek a resolution that works for the resident. We will clearly explain the steps we have taken, ensuring that the resident is happy with this. |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long                                                                                                                   | Yes              | Complaints Policy | GGA has two stages.                                                                                                                                                                                                                                                                                                                                                 |

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|     | and delay access to the Ombudsman.                                                                                                                                                                                                                                                                                       |     |                   |                                                                                                                                                                                                                                                                                                                                  |
| 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 Policy | Currently, all stage 1 complaints are managed by the Managing Agent.<br><br>Stage 2 are managed by the Trustee lead for complaints                                                                                                                                                                                               |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                                                                   | Yes | Complaints Policy | Currently, all stage 1 complaints are managed by the Managing Agent.<br>Stage 2 are managed by the Trustee lead for complaints.<br>Should this change in the future, this self-assessment will be updated.                                                                                                                       |
| 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 Policy | This is made clear within our Complaints Policy.<br>This is included within the GGA Complaints Process.<br>Within our complaint acknowledgement, we ensure we set out our understanding of the complaint and the residents desired outcomes. If any aspect of our residents complaint is unclear, we will ask for clarification. |
| 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 Policy | This is made clear within our Complaints Policy.                                                                                                                                                                                                                                                                                 |
| 5.8 | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open                                                                                                                                                                        | Yes | Complaints Policy | We understand the importance to investigate our customers complaints in an impartial manner. Those responsible for                                                                                                                                                                                                               |

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|      | <p>mind;</p> <p>b. give the resident a fair chance to set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>                                                                       |     |                   | responding at each stage of our complaints process are set out within the Complaints Policy. |
| 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 | Complaints Policy | This is made clear within our Complaints Policy.                                             |
| 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 Policy | This is made clear within our Complaints Policy.                                             |
| 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 Policy | This is made clear within our Complaints Policy.                                             |
| 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                                                  | Yes |                   | All complaint information is stored on our internal systems.                                 |

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|      | such as reports or surveys.                                                                                                                                                                                                                                             |     |                                |                                                                                                                                                                                                                                                                            |
| 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 | Complaints Policy              | <p>This is made clear within our Complaints Policy.</p> <p>The Managing Agent will speak to the resident about their complaint where possible they will try and resolve the complaint in a timely manner and in line with the residents expectations and GGA policies.</p> |
| 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 | Unacceptable behaviour policy. | GGA has an unacceptable behaviour policy                                                                                                                                                                                                                                   |
| 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 | Unacceptable behaviour policy. | This is made clear within our unacceptable behaviour policy.                                                                                                                                                                                                               |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                        | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                            |
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| 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              | Complaints Policy | This is made clear within our Complaints Policy.                                                                                                                                                    |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>                                                                                                                                                                                                                                      | Yes              | Complaints Policy | This is made clear within our Complaints Policy. Complaints are acknowledged within 5 working days.                                                                                                 |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                                                                                    | Yes              | Complaints Policy | We always aim to respond to our residents complaint within 10 working days following the complaint being acknowledged, where an extension if required we will clearly explain this to the resident. |
| 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                                                                                                                                                 | Yes              | Complaints Policy | This is made clear within our complaints policy.                                                                                                                                                    |

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|     | good reason, and the reason(s) must be clearly explained to the resident.                                                                                                                                                                                                                         |     |                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 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 | Complaints Policy | This is made clear within our Complaints Policy. When we contact the resident to advise them of this, we will provide them details of the Housing Ombudsman Service. Details for the Housing Ombudsman are also on our website.                                                                                                                                                                                                                                                                                                   |
| 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 | Complaints Policy | A complaint response is sent to the resident once the answer to their complaint is known and not when the outstanding actions detailed within the complaint are actioned. Once we've provided our stage 1 response to the resident, the appropriate team who manage the service area relating to the complaint, will monitor the outstanding actions through to resolution whilst providing regular updates to the resident. These actions are also monitored by the Managing Agent Operational Manager for additional assurance. |
| 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                                                                                                                          | Yes | Complaints Policy | We ensure that all aspects of the resident's complaint are addressed, and we clearly detail the reasons for any decisions which have been                                                                                                                                                                                                                                                                                                                                                                                         |

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|     | where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |                   | made. Where appropriate we reference, policy, law, and good practice.                                                           |
| 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 | Complaints Policy | This is made clear within our Complaints Policy.                                                                                |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Complaints Policy | This is made clear within our Complaints Policy, process and is within our template complaint response for both Stages 1 and 2. |

## Stage 2

| Code provision | Code requirement                                                                                                                                                                                                                | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                                                                                                                                                  |
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| 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              | Complaints Policy | This is made clear within our Complaints Policy.                                                                                                                                                                                                                                                                          |
| 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              | Complaints Policy | This is made clear within our Complaints Policy. Within 5 days we will acknowledge the request to escalate to stage 2.<br>Our stage 2 complaint acknowledgment will always outline our understanding of the complaint escalation and the outcome the resident is seeking, ensuring a clear understanding by both parties. |
| 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              | Complaints Policy | This is made clear within our Complaints Policy.                                                                                                                                                                                                                                                                          |
| 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 Policy | The Stage 2 review will be led by a Trustee                                                                                                                                                                                                                                                                               |

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| 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.                                                                                                                                                                                                    | Yes | Complaints Policy | This is made clear within our Complaints Policy. We always aim to respond to our resident's complaint within 20 working days following the Stage 2 complaint being acknowledged, where an extension if required we will clearly explain this to the resident. |
| 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 | Complaints Policy | This is made clear within our Complaints Policy.                                                                                                                                                                                                              |
| 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 | Complaints Policy | This is made clear within our Complaints Policy. GGA will inform the resident by email (and phone) and share the contact details for the Housing Ombudsman Service.                                                                                           |

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| 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 | Complaints Policy | A complaint response is sent to the resident once the answer to their complaint is known and not when the outstanding actions detailed within the complaint are actioned. |
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| 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 | Complaints Policy | We ensure that all aspects of the resident's complaint are addressed, and we clearly detail the reasons for any decisions which have been made. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> | Yes | Complaints Policy | This is made clear within our Complaints Policy, process and is within our template complaint response for both Stage 1 and 2.                  |

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| 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 Policy | This is made clear within our Complaints Policy. |
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## Section 7: Putting things right

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Comply: Yes / No | Evidence                                                 | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 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 Policy</p> <p>GGA Compensation Policy.</p> | <p>We will always acknowledge when something has gone wrong and explain the steps, we will take to put things right, these are set out within our Complaints Policy.</p> <p>Our Compensation policy sets out how and when we may compensation a resident.</p> <p>There are three types of compensation:</p> <ul style="list-style-type: none"> <li>• Mandatory.</li> <li>• Quantifiable loss payments</li> <li>• Discretionary payments</li> </ul> |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes              | <p>Complaints Policy</p> <p>Compensation Policy.</p>     | All remedies offered are assessed in line with our internal Compensation Policy and the guidance provided by the Housing Ombudsman Service.                                                                                                                                                                                                                                                                                                        |
| 7.3            | The remedy offer must clearly set out what will happen and by when, in agreement with                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Yes              | Complaints Policy                                        | We will always clearly set out the actions we will take and by                                                                                                                                                                                                                                                                                                                                                                                     |

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|     | the resident where appropriate. Any remedy proposed must be followed through to completion.                |     | Compensation Policy.                      | when.                                                                                     |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Complaints Policy<br>Compensation Policy. | Both policies are in line with the information provided by the Housing Ombudsman Service. |

## Section 8: Putting things right

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Comply: Yes / No | Evidence                                                                                                          | Commentary / explanation                                                                                                                        |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol> | Yes              | <a href="https://georgegreensalmshouses.org.uk/governance/">https://georgegreensalmshouses.org.uk/governance/</a> | The annual complaints and performance report has been published and has been shared with the Housing Ombudsman Service.                         |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Yes              | <a href="https://georgegreensalmshouses.org.uk/governance/">https://georgegreensalmshouses.org.uk/governance/</a> | The annual complaints and service improvement report was reviewed by the GGA Trustees. Their comments are included within the published report. |

|     |                                                                                                                                                                                                                                                                                                                   |     |     |                                                                                                                           |
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|     | The governing body's response to the report must be published alongside this.                                                                                                                                                                                                                                     |     |     |                                                                                                                           |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.                                                                                                                                                                                          | Yes | N/A | Should GGA carry out a significant restructure, merger or change in procedures a new self-assessment will be carried out. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.                                                                                                                                                                                                             | Yes | N/A | Should the Housing Ombudsman service ask GGA to review and update our self-assessment we will do so.                      |
| 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 | N/A | Should GGA be unable to comply with the code we will inform the Housing Ombudsman service.                                |

## 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              | Trustee minutes and actions                                                                                                                        |                          |
| 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              | Trustee minutes and actions                                                                                                                        |                          |
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | Yes              | Lessons from cases are shared with the Managing Agents. Trustees have visibility of performance and service improvement through regular reporting. |                          |

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| 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 | Trustees lead for Complaints                                                                                         | The Managing Agent provides regular information on themes, trends to understand key issues and identify risks. |
| 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 | See Trustee Minutes May 2024                                                                                         | GGA have appointed a Trustee as the MRC – this commenced in May 24.                                            |
| 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 | Information is shared with the MRC to ensure the Trustees have oversight and understanding of complaint performance. |                                                                                                                |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>b. regular reviews of issues and trends arising from complaint handling;<br>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; | Yes | This information is provided bi-monthly to the MRC.                                                                  |                                                                                                                |

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|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|     | <p>And</p> <p>d. annual complaints performance and service improvement report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |     |                                                                                                                                                                                        |  |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | Yes | <p>The Managing Agent has a standard objective for all relevant colleagues, we also have specific objectives for certain colleagues who play a key role in the complaints process.</p> |  |