

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	ISHA's complaints policy adopts the exact wording "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by ISHA, our own staff, or those acting on our behalf, affecting an individual resident or group of residents."	Section 2.1
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Staff are trained to identify complaints even if not explicitly labelled. Whenever a resident expresses dissatisfaction, we will give them the choice to make a complaint. We will continue to address the service request if a complaint is raised. Complaints submitted via a third party or representative are handled in line with our complaints policy	Section 2.1
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	If a resident makes a service request but doesn't want to make a complaint, we'll still record it in our housing management system, keep track of it, and check on it regularly. If the resident later says they're unhappy with how we've handled the request — even if we're still working on it — we will treat it as a	Section 2.1

			complaint.	
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	We will raise a complaint if the resident says they're unhappy with how their service request has been handled, even if we're still working on it.	Section 2.1
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	When we ask residents for feedback through surveys, we'll also share information about how to make a complaint, in case they want to raise any concerns.	Section 2.1

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Each case is reviewed individually. Our policy lists reasons we may not accept a complaint and if the decision is made not to, valid reasons are recorded and explained.	Section 2.2
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <p>The issue giving rise to the complaint occurred over twelve months ago.</p> <p>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.</p> <p>Matters that have previously been considered under the complaints policy.</p>	Yes	<p>We may not consider a complaint if it falls under certain exclusions. These include matters that are subject to legal proceedings, complaints that are over 12 months old, and cases involving unreasonable behaviour. A complaint may also be excluded if the complainant is acting unreasonably, in line with our guidance on 'Dealing with Unreasonable or Unreasonably Persistent Customers.'</p> <p>Complaints will also be excluded if the issue forms part of an ongoing legal matter initiated by either the resident or ISHA, or if it relates to the outcome or judgment of a court or tribunal. If we receive legal instruction or</p>	Section 2.2

			correspondence during the handling of a complaint, we reserve the right to refer the matter to our legal representatives and will write to the resident to confirm this.	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	We will consider all complaints on their individual merits and will accept them unless there is a valid reason not to. While our general approach is to exclude complaints that are over 12 months old, we retain the discretion to accept older complaints where there is a justified reason to do so.	Section 2.2
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the 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	Refusals are communicated in writing with clear rationale and Ombudsman contact info.	Section 2.2
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints are assessed on an individual basis, and ISHA will consider each one on its own merits. We accept all complaints unless there is a valid reason not to. Where a complaint is excluded due to unreasonable or	Section 2.2

			inappropriate behaviour, this decision will follow a formal procedure in line with our policy on managing unreasonable or unreasonably persistent behaviour.	
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### 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	A representative or advocate can act on a resident's behalf with signed consent. This may be a friend, relative, or someone from an organisation such as Citizens Advice or MIND. MPs and councillors can also enquire on behalf of a resident. If a resident needs help to make a complaint, we will provide support, including reasonable adjustments under the Equality Act 2010, and may encourage the use of a representative with the resident's permission. Complaints can be made by phone, email, social media, in person, or online, with reasonable adjustments available for all methods.	Section 2.3
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Residents can raise complaints with any staff member or through our usual contact points. All staff are trained to direct complaints to the appropriate team.	Section 2.3
3.3	High volumes of complaints must not be	Yes	We want to hear from residents	Section 2.3

	<p>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.</p>		<p>when they are dissatisfied with their home or any service provided by us or on our behalf. We aim to make it easy for residents to share their concerns in the most convenient way for them. Complaints are valuable to us as they help us address issues promptly, rebuild relationships, learn, and improve our services. We will always strive to resolve a resident's complaint effectively</p>	
3.4	<p>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.</p>	Yes	<p>Our complaints policy is available online and in accessible formats upon request. ISHA follows a two-stage complaints process to comply with the Housing Ombudsman's Complaint Handling Code. The policy outlines how we will handle complaints, aiming to resolve issues quickly, consistently, and fairly for our residents. It applies to all residents, including anyone receiving services from us, and covers actions by all ISHA employees, contractors, subcontractors, agents, and volunteers. Our complaints policy is informed by the Housing Ombudsman's Complaint Handling Code (April 2024) and can be found on our website</p>	Section 2.3



			under Complaints Policy 2023 (isha.co.uk).	
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	We will ensure that residents understand their right to complain and how to do so by providing clear information about our complaints policy on our website. This information will also be available through other channels, such as social media and newsletters, upon request. It will include details about the Housing Ombudsman's Complaint Handling Code and guidance on how to raise a complaint directly with the Housing Ombudsman.	Section 2.3 and 2.4
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	Signed authority from the resident is required. This can be provided by a friend, relative, or a representative from an external organisation such as the Citizens Advice Bureau or MIND. MPs and councillors can also enquire on behalf of the resident.	Section 2.4
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Ombudsman contact info provided at each complaint stage and with final response.	Sections 2.7, 2.9, 2.10

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	All complaints are handled by our Complaints and Resolution Team. The team will contact the resident to gather more details and work with relevant staff to investigate the issue.	Section 2.5
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Officers work across departments and have the autonomy to act. At each stage of the complaints process, our Complaints and Resolution Officers will assess complaints on their merits, act independently, and remain open-minded. They will give residents a fair opportunity to present their case and take steps to address any actual or perceived conflicts of interest. The team will carefully consider all relevant information and evidence and have the authority to resolve disputes quickly and fairly.	Section 2.5
4.3	Landlords are expected to prioritise	Yes	Complaints help us improve our	Section 3 and learning from

	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		service, and we aim to maintain a positive culture around complaint handling. The Director of Culture, Communications, and Involvement oversees performance and works with the complaints team to identify trends, systemic issues, and areas needing improvement. The Director sets objectives for complaint handling, ensures compliance with legislation, and oversees the annual complaints self-assessment. We report regularly to ISHA's Board on complaint performance, with a Board member taking lead responsibility for complaints. The Board reviews complaint trends, Ombudsman outcomes, and progress on compliance. We keep residents informed about the actions taken in response to complaints via our website, social media, newsletters, and the Residents' Annual Report.	complaints
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### Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints	Yes	Our complaints policy applies equally across all service	Section 1 and 2.5

	covered by this Code. Residents must not be treated differently if they complain.		areas. It outlines how we aim to resolve issues quickly, consistently, and fairly for all residents and anyone receiving our services. The policy covers the actions of all ISHA staff, including contractors, subcontractors, agents, and volunteers, and is informed by the Housing Ombudsman's Complaint Handling 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	ISHA operates a two-stage complaints process in line with the Housing Ombudsman's Complaint Handling Code. We do not have a Stage 0; all complaints are formally logged and addressed through our complaints procedure.	Section 2.5
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	ISHA operates a two-stage process.	Sections 2.6, 2.9
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Our complaints policy outlines how we aim to resolve issues quickly, consistently, and fairly. It applies to all residents and anyone receiving our services, and covers the actions of all ISHA employees, including contractors, subcontractors, agents, and volunteers—who	Section 2.5

			are required to follow ISHA's complaints process.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our complaints policy sets out how we resolve issues quickly, consistently, and fairly. It applies to all residents and service users, and covers the actions of all ISHA employees, including contractors, subcontractors, agents, and volunteers. While these parties are expected to follow our complaints process, ISHA retains full oversight and accountability for complaint handling.	Oversight and accountability retained by ISHA.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	We will acknowledge all complaints in writing within five working days of receipt. Our acknowledgement will include a clear definition of the complaint, our understanding of the issues raised, and the outcomes the resident is seeking.	Sections 2.6, 2.9
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	When defining the complaint, we will clearly explain which aspects ISHA is responsible for and which are outside our responsibility.	Sections 2.6, 2.9
5.8	At each stage of the complaints process, complaint handlers must:	Yes	At each stage of the process, Complaints and Resolution	Section 2.5

	deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully.		Officers will make independent, evidence-based, and unbiased decisions. Residents will be given a fair opportunity to present their case, and any actual or perceived conflicts of interest will be addressed. All relevant information and evidence will be carefully considered.	
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	Any extensions to timeframes will be explained and agreed in writing. The frequency of contact between the complaint handler and the resident will also be agreed at the start of the investigation, with updates provided accordingly.	Sections 2.6, 2.9
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	We will support residents who need help to make a complaint, including providing reasonable adjustments under the Equality Act 2010. Where appropriate, and with the resident's permission, we will encourage the use of a representative or advocate. All adjustments will be recorded and reviewed as needed.	Section 4.2
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid	Yes	We will accept all requests to escalate a complaint to Stage 2 unless there is a valid reason	Section 2.8

	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.		not to. Any decision to refuse will be clearly explained, based on the specific circumstances of the complaint, and residents will be informed of their right to refer the matter to the Housing Ombudsman.	
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	Our complaints policy outlines how we handle complaints and is informed by the Housing Ombudsman's Complaint Handling Code (April 2024). We also adhere to relevant GDPR legislation, ensuring that all communications and documents are securely stored.	Internal procedure
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	We welcome complaints as they help us improve our services. Our priority is to resolve issues quickly, fix problems immediately, rebuild relationships with residents, and learn from the experience. We are committed to addressing all complaints without delay.	Section 2.5
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	Yes	We follow our 'Dealing with Unreasonable or Unreasonably Persistent Customers' guidance when managing unacceptable behaviour from residents and their representatives. This	Section 2.2

	must keep restrictions under regular review.		guidance includes clear instructions on the potential restrictions we may apply and the reasons for implementing them. Regular reviews ensure these restrictions are appropriately enforced.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	We follow our 'Dealing with Unreasonable or Unreasonably Persistent Customers' guidance when managing unacceptable behaviour from residents and their representatives. This guidance outlines potential restrictions we may apply, along with the reasons for and process of implementing them. Equality considerations are fully documented throughout the process to ensure fair treatment.	Section 2.2



## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	At each stage of the complaints process, Complaints and Resolution Officers will assess complaints on their merits, acting independently and with an open mind. They will carefully consider all relevant information and evidence, taking into account the complexity and risk involved. The team has the authority and autonomy to resolve disputes quickly and fairly.	Section 2.5
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	We will acknowledge all complaints in writing within five (5) working days of receipt. The acknowledgment will include a definition of the complaint and the outcomes the resident is seeking.	Section 2.6
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	The assigned Complaints and Resolution Officer will investigate the complaint, make a decision, and inform the resident in writing within 10	Section 2.6

			working days of ISHA's acknowledgment.	
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	Up to 10 days, with agreement and Ombudsman contact info.	Section 2.6
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	We will provide the contact details for the Housing Ombudsman along with any extension notices.	Section 2.6
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Once the investigation is complete, we will write to the resident with the outcome, detailing how we are resolving the issue, any outstanding actions, and how they will be tracked and completed. The complaint handler will stay in contact with the resident until all actions are finished.	Section 2.7
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	We will address all points raised in the complaint definition and provide clear reasons for our decisions, citing relevant policies, laws, and best practices where applicable.	Section 2.7

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	If additional complaints are raised during the investigation, they will be included in the Stage 1 response if related and if the response has not yet been issued. If the response has already been sent, the issues are unrelated, or incorporating them would unreasonably delay the process, the new complaints will be logged separately.	Section 2.6
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Once the investigation is complete, we will inform the resident of the outcome, including the complaint stage, definition, decision, reasons, how we're resolving the issue, any outstanding actions, and how they will be tracked. The complaint handler will remain in contact until actions are completed. We will also provide escalation details for Stage 2 if the resident is unsatisfied. The outcome will indicate whether the complaint is upheld, not upheld, or partially upheld, and each issue will be addressed separately.	Section 2.7

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	If a resident remains dissatisfied with any part of their Stage 1 response, the complaint can be escalated to Stage 2, the final stage of ISHA's complaints process. All Stage 2 requests will be acknowledged and will be accepted unless there are valid reasons not to.	Section 2.9
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Requests for Stage 2 will be acknowledged and logged within five working days, outlining the unresolved issues and the desired outcome	Section 2.9
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Requests for Stage 2 will be acknowledged and logged within five working days, outlining our understanding of the outstanding issues and the desired outcomes. We will make reasonable efforts to fully understand the resident's concerns.	Section 2.9
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Stage 2 investigator will be a different officer from the one who handled the Stage 1 investigation.	Section 2.9
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	The resident will be notified of the review outcome within 20 days of their Stage 2 escalation request.	Section 2.9

			Extensions will only be used when necessary, and timescales will be closely monitored.	
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	The Stage 2 outcome will be provided within 20 days. If the investigation is complex and an extension is needed, the expected timescale will be communicated. Any extension will not exceed an additional 20 working days without a valid reason, which will be clearly explained, along with contact information.	Section 2.9
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	The Housing Ombudsman's contact details will be provided whenever an extension is requested. This information will always be included in extension notices.	Section 2.9
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	The Stage 2 response will include the complaint stage, definition, decision, reasons, how we will resolve the issue, any outstanding actions, and details on escalating to the Housing Ombudsman if the resident remains dissatisfied. We use a commitment log to monitor outstanding actions after the complaint is closed.	Section 2.9
6.18	Landlords must address all points raised in the complaint definition and provide	Yes	Where the complaint involves multiple issues, each will be	Section 2.9

	clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		addressed separately, with relevant policy references and explanations included.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; 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 Ombudsman Service if the individual remains dissatisfied.	Yes	The Stage 2 response will include the complaint stage, definition, decision, reasons, how we will resolve the issue, any outstanding actions, and instructions for escalating to the Housing Ombudsman if the resident remains dissatisfied. This will cover the complaint definition, decision, remedies, and next steps.	Section 2.9
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 is the final stage of our complaints process. The Stage 2 investigator will review the Stage 1 decision, any new information, and may hold a meeting or call to fully understand the unresolved issues. Further actions may be identified and completed before closing the complaint. If no additional actions are needed, the complaint will be closed as it has exhausted the complaints process.	Section 2.9

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices.	Yes	Once the investigation is complete, we will inform the resident of the outcome, including the complaint stage, definition, decision, reasons, how we are resolving the issue, and any outstanding actions with tracking details. The complaint handler will stay in contact until all actions, which may include an apology, reimbursement, or service improvement, are completed.	Section 2.7, 2.9
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We use our compensation guidance document to inform remedy decisions. Each remedy is tailored to the complaint and clearly explained.	Case outcomes
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our complaint responses include how we are resolving the issue, any outstanding actions, and how they will be tracked until completed. The complaint handler will remain in contact with	Section 2.7

			the resident until all actions, including remedies, are fully resolved.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	ISHA uses Housing Ombudsman guidance as a benchmark for fair and proportionate action and relies on our compensation guidance document to inform remedy decisions.	Internal process has been aligned



## 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> <ul 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> </ul>	Yes	Approved by the Board and published on ISHA website for transparency.	Section 3 and Annual Complaints Report

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	In line with the Complaint Handling Code, we produce an annual complaints performance and service improvement report, approved by the Board and published on our website.	Section 3
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We understand this requirement, and it has not been necessary this year. The self-assessment is reviewed during structural changes or policy shifts.	Change procedures
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We comply with review and update requirements post-investigation.	Process on demand
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We understand this requirement, and it has not been necessary this year.	

## Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	The Director, alongside the complaints team, assesses themes and trends to identify systemic issues, risks, and policies needing revision. Service reviews also include lessons learned from complaints.	Complaints Policy Section 3
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaints help us improve our service, and we aim to maintain a positive complaints handling culture. The Director of Culture, Communications and Involvement oversees performance and, with the complaints team, assesses trends to identify systemic issues, risks, and areas for policy revision.	Internal briefings
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	We share key learnings and actions from complaints through multiple channels, including our website, social media, resident newsletters, and the Residents' Annual Report. We also report to our Resident Scrutiny Panel and are working towards creating a Resident Complaint Panel as part of our resident involvement strategy.	Website, newsletters
9.4	Landlords must appoint a suitably senior	Yes	The Director of Culture,	

	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.		Communications and Involvement oversees complaint handling performance, reviewing trends with the complaints team to identify systemic issues, risks, and areas for policy revision. They lead improvement actions based on complaint trends.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	A member of ISHA's Board is appointed as the lead for complaints, ensuring the Board receives regular updates on complaint volume, categories, outcomes, and emerging trends. The Member Responsible for Complaints (MRC) was appointed at the March 2024 Board meeting to ensure oversight.	Board appointment records
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	A member of ISHA's Board is appointed to lead on complaints, ensuring the Board receives regular updates on complaint volume, categories, outcomes, and emerging trends. The Board also reviews Ombudsman investigation outcomes and progress on compliance with orders, enabling scrutiny and accountability.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>regular updates on the volume,</li> </ul>	Yes	A member of ISHA's Board leads on complaints, ensuring regular updates on complaint volume, categories, outcomes, and trends.	Quarterly reports

	<p>categories and outcomes of complaints, alongside complaint handling performance;</p> <ul style="list-style-type: none"> <li>• regular reviews of issues and trends arising from complaint handling;</li> <li>• regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>• annual complaints performance and service improvement report.</li> </ul>		<p>The Board also reviews Ombudsman outcomes and compliance. We produce an annual performance and improvement report, reviewed by the Board and published online, covering volume, types, trends, and Ombudsman outcomes.</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: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>The Director will set standard objectives for complaint handling across relevant staff, with responsibilities included in team objectives and training programs.</p>	Training materials