Appendix A: Self-assessment form

(This assessment has been completed for Newlon residents and Access residents as all services are provided by Newlon Housing Trust)

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	Yes	Complaints Policy states in section 5 A complaint is defined as an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents. Our Complaints procedure offers in section 3.1 detailed guidance on how complaints relating to staff or operatives should be managed. This was updated in November 2025.	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy states in section 5 The resident does not have to use the word complaint for it to be treated as such. Staff should recognise the difference between a service request (pre-complaint), survey feedback and a formal complaint and take appropriate steps to resolve the issue for residents as early as possible.	
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 Procedure states the following in Section 1 Staff should be clear about the difference between when a resident is making a service request, where a resident may be unhappy about the situation that they want rectified and when they are making a complaint. Service request - a service request is a first request requiring action to be taken to put something right. This could relate to a repair, provision of service or action, where the timeframe for delivering that repair or action has not yet passed or where it can be easily resolved to the customer's satisfaction at the first point of contact.	

			Where there is a clear breach of service standards, or it is not possible to provide an explanation and a resolution to the resident's dissatisfaction at the first point of contact and the resident is dissatisfied with the handling of repairs/repetitiveness of the issue then this should be logged as a formal Stage 1 complaint. An example of this is a complex repair matter where there have been several failed appointments and there are several different activities still outstanding. All service requests whether it be reporting ASB or reporting a repair are logged on the Customer Relationship Management system and these cases are managed by relevant teams. All contacts are then monitored as part of review of levels of customer contact. We log cases where we can put in place a resolution on the same day and where these are unsuccessful these are then logged as Stage 1 complaints. These are reported to RSC. Service requests are reported as part of annual report to Board Briefings have been held with staff on All In Days to ensure all staff are clear on the distinction.	
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	The Complaints procedure states in section 1.4 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. At this time efforts to address the service request should not be stopped if the resident complains.	

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	The Complaints Policy states in Section 1 Where residents are expressing clear dissatisfaction with a service as part of their feedback in a survey that Newlon have carried out, this should be passed on to the Service Resolution Team to log as a complaint where there has been a service failure (in line with the Complaints Policy and Procedure). The survey company working on Newlon's behalf ensure residents are aware of the complaints process if they are dissatisfied. The survey company flags this and passes on to us. We categorise it depending on the severity of the issue. The case is then triaged to key service leads to manage.	

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	The Complaints Policy in Section 5 states – Newlon will not accept any formal complaint at stage 1 or stage 2 which would not be within the remit of the Housing Ombudsman Service. Please see our Complaints Procedure for details of exceptions which would not fall within the Ombudsman's jurisdiction, and which will therefore not be dealt with by Newlon as formal complaints. If a request to make a complaint is not accepted, (see Complaints Procedure section on exceptions to procedure for more details) then the reasons for this must be clearly outlined and the person given the right to appeal. Any complaint that is refused should be logged as an	

			Information & Advice case, Cat 1 – Refused Complaint, Category 2 – as per exceptions outlined in procedure. Each case should be considered on its own merits. This appeal should be considered by the Assistant Director for Housing or in their absence the Head of Service Improvement. When writing to advise the resident of the decision, this should include information on their right to take that decision to the Ombudsman.	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	Appendix 2 to the Complaints procedure details the exceptions to the procedure as to what will not be considered as a Complaint, this includes these 3 categories.	
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	Yes	Appendix 2 to the Complaints procedure details the exceptions to the procedure and states – Complaints will not generally be accepted if the issue giving rise to the complaint occurred over twelve months ago, unless there are good reasons to apply any discretion.	

	apply discretion to accept complaints made outside this time limit where there are 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	Please see evidence box for 2.1 above.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	The Complaints Policy in Section 5 states – If a request to make a complaint is not accepted, (see Complaints Procedure section on exceptions to procedure for more details) then the reasons for this must be clearly outlined and the person given the right to appeal. Any complaint that is refused should be logged as an Information & Advice case, Cat 1 – Refused Complaint, Category 2 – as per exceptions outlined in procedure. Each case should be considered on its own merits. This appeal should be considered by the Assistant Director for Housing or in their absence the Head of Service Improvement. When writing to advise the resident of the decision, this should include information on their right to take that decision to the Ombudsman.	

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	The Complaints Policy states in Section 1 The complaints process must comply with the Equality Act 2010, and we may need to adapt normal policies, procedures, or processes to accommodate an individual's needs and make reasonable adjustments to address this. (See our Reasonable Adjustments & Supporting Vulnerable residents Policy for further details.)	
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	The Complaints Policy states in Section 1 Complaints can be made through a variety of channels including: • Online. • By letter. • By e-mail. • By phone. • In person – by appointment only. Policy states they can be made to any member of staff. Briefings have been held with staff around this.	
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	We believe that our approach shows we have made it easy for residents to make a complaint. We have a relatively high level of complaints and believe that this demonstrates our open access to the complaints process.	
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	Yes	We regularly promote the complaints process in our residents' newsletters, we report it in our annual report, give our complaints leaflet to our new residents before they move into their Newlon home and it is on our website. Our complaints policy & procedure are also on our website.	

	timeframes for responding. The policy must also be published on the landlord's website.		Our policy & procedure is clear that it is a 2-stage process.	
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 outlines in Section 2 how we publicise our policy and lists the following: this is done during the sign-up process, when you first become a Newlon resident, on our website, in our 'contact us' section. Information is also available in our Head Office reception area, from any staff members and in our residents' newsletter, where there is also information on how we use feedback.	
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 outlines in Section 3 states – A person acting on behalf of a resident. A third party can make a complaint on behalf of a resident tenant, but unless Newlon has express permission in writing to liaise with them as an advocate, all communication around the complaint will be with the resident. If a resident lacks capacity to authorise a representative, adequate evidence of their legitimate authority must be provided. This also includes a person with authority to make a complaint on behalf of any people described above who are deceased.	
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	Our Complaints Procedure includes a clear explanation of the different complaint stages, including residents' right to take the matter to the Ombudsman, detailing what will happen at each stage and timeframes for responding. This is documented throughout the procedure. The website includes the Ombudsman's details, and we regularly publicise the complaints process, including the Ombudsman's role in out newsletter. The standard templates used for Stage 1 and 2 complaint responses has information about the Ombudsman and has been updated to reflect the Ombudsman's form that is now the preferred method of contact.	

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	The Complaints procedure section 4 states – Whilst the Service Resolution Team will largely be responsible for responding to the complainant, the Service Manager will need to take responsibility for ensuring that actions are delivered, and solutions identified. This can involve identifying a series of actions within agreed timescales to resolve the complaint and identifying alternative solutions in a timely manner should the original actions not resolve the issues. The Complaints procedure section 9 states – The Service Improvement Team will be responsible for managing any correspondence from the Ombudsman regarding requests for documentation when a complainant has appealed to the Ombudsman. This should be done within the timescale set by the Ombudsman, but if a response cannot reasonably be provided within this timeframe, an explanation for the delay must be provided and if the explanation is reasonable, the Ombudsman will agree a revised date with Newlon. The Head of Service Improvement reports Complaints regularly to the governing body.	
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	Yes	The Complaints procedure section 5 states – The Service Resolution Managers will consult with the relevant teams but will have the authority to decide on the best resolution for the complaint. In the case of complaints	

	autonomy to act to resolve disputes promptly and fairly.		about the repairs service, they will need to consider budgetary constraints, but may choose to: • Instruct a contractor to expedite repairs. • Instruct a contractor to provide a written plan to fully remedy an issue including consideration of a 'plan B' in case original assumptions are incorrect or timescales are not met. • Obtain a second opinion on a complex repair issue. • Use an alternative contractor. • Undertake a remote video inspection of issues with the agreement of the resident. • Schedule an inspection by a surveyor. • In some exceptional cases they may even consider something outside of normal arrangements if it is in the interests of resolving the complaint. • Where appropriate the cost will be met by the incumbent contractor. We have focused resource on resolving complaints relating to repairs. We have introduced clear escalation processes and hold regular meetings with service leads to review complaints where there are actions outstanding before complaints can be resolved.	
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	The Complaints procedure section 11 states – For the directors and senior managers, learning from complaints promotes the open and transparent use of information to assess performance and risks and to inform strategic decisions relating to service delivery. Complaints provide senior staff and service managers and team leaders with an insight into day-to-day operations allowing them to assess effectiveness and drive service improvement.	

			Complaints are regularly talked about at staff All In days to ensure all staff are clear on their importance. Complaints are a fixed agenda item at contractor meetings and learning form complaints is shared with them. The Service Resoluttion Team has had their resources increased to ensure that we are able to effectively manage the level of complaints we receive.	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy and procedure in place.	
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	We have a two-stage process. We closely monitor the escalation rate from stage one to two, and we report on these. We aim to resolve as many complaints as possible at stage one, reducing resident effort.	
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	We have a two-stage process.	

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	Newlon are responsible for complaints about their services. Our Complaints policy & procedure covers how complaints about operatives will be managed and makes clear that complaints regarding contractors are treated as Newlon's complaints. This has been made clear to our contractors.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See above	
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	The Complaints procedure details in Section 5 & 6 the requirement to detail what the complaint is about and at Stage 2 what is understood to be the issues outstanding, as well as the outcomes being sought. The procedure also states where any aspect is unclear that clarity should be sought from the resident.	
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	The Complaints procedure details in Section 5 & 6 It must be made clear which aspects of the complaint Newlon are, and are not, responsible for and clarify any areas where this is not clear.	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind. b. give the resident a fair chance to set out their position.	Yes	The Complaints procedure details in Section 5 & 6 it states – When formulating a response, the service resolution team should • Deal with complaints on their merits. • Act independently and have an open mind.	

	c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		• Take measures to address any actual or perceived conflict of interest. • Consider all information and evidence carefully.	
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	The Complaints procedure details in Section 5 & 6 it states. Extensions - Where the timescale is not possible to be met due to the complexity, an explanation to the resident containing a clear timeframe for when the response will be received should be sent. This should not exceed a further 10 days without good reason. This is to be done by the Service Resolution Team. If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties, and the resident should be supplied with the Ombudsman details. The number of extensions are reported to our Executive team on a monthly basis as part of performance reporting.	
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	The Complaints policy in Section 1 states The complaints process must comply with the Equality Act 2010, and we may need to adapt normal policies, procedures, or processes to accommodate an individual's needs and make reasonable adjustments to address this. (See our Reasonable Adjustments Policy for further details.) We have held sessions in our All-in staff Day on how we need to adjust services for residents to ensure staff are clear on their responsibilities.	
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	Yes	The Complaints procedures states in section 5 Where it is felt, following an initial review that the Stage 1 response is the final position, and the matter should not be	

	clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		escalated to Stage 2, then the matter should be raised with two of the following senior managers to review: Head of Customer Services, Housing Services Director, Assistant Director of Housing or Head of Service Improvement. If this is agreed, then an explanation of the decision not to escalate must be given to the resident. It should make clear that the previous response was Newlon's final response to the complaint and provide information on how the complainant can make a referral 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	The Complaints Procedure states in Section 4 - A full record of the complaint must be recorded on Dynamics with clear outcomes at each stage, this includes all correspondence with the resident and relevant parties as well as any relevant documentation 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	The Complaints Procedure states in Section 4 - Whilst the Service Resolution Team will largely be responsible for responding to the complainant, the Service Manager will need to take responsibility for ensuring that actions are delivered, and solutions identified. This can involve identifying a series of actions within agreed timescales to resolve the complaint and identifying alternative solutions in a timely manner should the original actions not resolve the issues.	
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	Yes	Appendix 1 of the Complaints procedure outlines Newlon's approach to managing unacceptable behaviour	

	putting any restrictions in place and must keep restrictions under regular review.			
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	The Unacceptable Behaviour Policy outlines how services are delivered when restrictions are put in place. This references the Equality Act 2010 and reflects the key staff we have in place to offer support to residents.	

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	Complaints policy section 6 We aim to 'triage' complaints to ensure complaints that can be resolved promptly are done so and that where there are vulnerabilities these are prioritised to reduce any risk or impact on the resident.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	The Complaints procedure in Section 5.1 states – Logging and acknowledgement of complaint – five working days within receipt of complaint, this should make it clear who will be responding and within what timescale, as well as outlining what our understanding of the complaint is, and the outcomes sought. If this is unclear this should be clarified with the resident.	

6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	The Complaints procedure in Section 5.1 states – Stage one response outlining the decision – 10 working days from the date the complaint was logged and acknowledged.	
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	The Complaints procedure in Section 5.1 states – Extensions - Where the timescale is not possible to be met due to the complexity, an explanation to the resident containing a clear timeframe for when the response will be received should be sent. This should not exceed a further 10 days without good reason. This is to be done by the Service Resolution Team. If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties, and the resident should be supplied with the Ombudsman details.	
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	See above	
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	The Complaints procedure in Section 5.2 states – The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied. Actions are monitored by tasks assigned to staff; weekly reminders are sent to all staff with outstanding actions. This is monitored by the Service Resolution Team Leader. Complaints are discussed regularly with contractors to ensure outstanding actions are progressed.	

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	The Complaints procedure in Section 5.2 states A response should include – • A response on all the issues that have been complained about; • The outcome/decision of the complaint; • The reasons for any decisions made referencing the relevant policy, law and good practice where appropriate. We use Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether all aspects of the resident's complaint were captured in the response.	
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	The Complaints procedure in Section 5.2 states Where a resident has raised new issues, these should be included in the investigation and the Stage 1 response, where they are related. Where the Stage 1 response has been issued, or it would cause a delay in the response being sent or the issues are not related, then a separate and new complaint should be logged regarding these. Where the resident then wishes to escalate both Stage 1 complaints these would be managed better if they were merged to ensure that there is clear communication on all outstanding matters.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage. b. the complaint definition. c. the decision on the complaint. d. the reasons for any decisions made.	Yes	Section 5.2 of Complaints Procedure	

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

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 6 of the Complaints Procedure states – If the complainant wishes to escalate their complaint as they are unhappy with the outcome of the Stage 1 process, we will usually escalate this matter to the next stage (Stage 2), although there are some exceptions to this – see Appendix 2 on exceptions to procedure below.	
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	Section 6 of the Complaints Procedure states Stage 2 response - This should be acknowledged within five working days of the request to escalate.	
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	Section 6 of the Complaints Procedure states To ensure it is clear what aspects of the complaint that the complainant is unhappy with, they should state the reasons they remain unhappy with the handling of their complaint and what they would like in order to put the matter right. This is so that when reviewing the complaint, it will be clear about what issues have not been addressed to their satisfaction and what their preferred outcome is. However, the lack of this is not a sufficient reason for not escalating the complaint. Where there is a lack of clarity	

			where possible contact should be made with the resident to understand their appeal reasons more clearly.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 6 of the Complaints Procedure states The Stage 2 will be managed within the Service Resolution team by a member of staff who has not previously been involved with the complaint.	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	Section 6.1 of the Complaints Procedure states This should include a definition of the Stage 2 complaint, and a full response sent 20 working days from date the complaint was acknowledged. Complaints performance is reported to Executive tea\m monthly, and Board & Residents' Forum on a quarterly basis.	
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	Section 6.1 of the Complaints Procedure states If this is not possible due to the complexity an explanation and a date when the Stage 2 response will be received should be provided to the complainant. This should not exceed a further 20 working days without good reason and the reason(s) must be clearly explained to the resident. Details of the Ombudsman must be provided at this time. We use Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether a complaint was extended with good reason.	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 6.1 of the Complaints Procedure states Where timescales cannot be met and an extension cannot be agreed with the resident, the resident should be supplied with the Ombudsman details.	

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	Section 6.1 of the Complaints Procedure states The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied. Actions are monitored by tasks assigned to staff; weekly reminders are sent to all staff with outstanding actions. The Service Resolution Team Leader monitors this.	
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	Section 6.1 of the Complaints Procedure outlines Newlon's approach which covers this. We use Scorebuddy, which scores a selection of complaint responses on a variety of measures, including whether all aspects of the resident's complaint were captured in the response.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage. b. the complaint definition. c. the decision on the complaint. d. the reasons for any decisions made. e. the details of any remedy offered to put things right. f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Section 6.1 of the Complaints procedure outlines this – • Stage 2 responses should include the following (as with Stage 1): • The complaint stage. • What the issues are that the resident remains unhappy about. • A review of the Stage 1 decision and decide whether the complaint was handled: • ➢ In accordance with Newlon's policies and procedures. • ➢ Thoroughly having considered all the available relevant facts. • ➢ Fairly and reasonably. • An apology for any service failure. • A response on all the issues that have been complained about.	

			• An explanation where appropriate for the service failure. • The outcome of the complaint. • The reasons for any decisions made referencing the relevant policy, law and good practice where appropriate. • The details of any remedy offered to put things right, including an assessment of compensation where appropriate. • The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied. A clear explanation of the different complaint stages, including their right to take the matter to the Ombudsman, detailing what will happen at each stage and timeframes for responding.	
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 procedure in section 5 details Newlon's approach to joint working to ensure resolutions are put in place.	

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.	Yes	Our Complaints Policy outlines our approach – We are committed to using customer feedback to improve the services that we provide. We aim to: • Provide a resolution to the resident's complaint promptly. • Communicate the resolution or response clearly. • Put things right when they go wrong and resolve the complaint quickly. • Act sensitively, empathetically, and fairly.	

	• 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.		• Record, analyse and learn from all customer feedback to drive service improvements. • Monitor our response times and publicise our performance. • Deal with as many complaints as possible at the first point of contact. Our CRM system used for managing complaints has a mandatory field for all complaints to complete a learning from complaints comment. These are then reviewed at our monthly Learning from complaints meetings. Our Scorebuddy system includes a check that these learning from complaints fields are being completed and where this has not been done this is fed back to staff.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 5.2 of the Complaints procedure states – The details of any remedy offered to put things right, including an assessment of compensation where appropriate. Any remedy should reflect the level of impact that the service failure it has had on the resident.	
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	Section 5.2 of the Complaints procedure states – The details of any outstanding actions (and timescales to remedy), including who will be responsible for monitoring this and details of how to escalate the matter if dissatisfied. A clear explanation of the different complaint stages, including their right to appeal to Stage 2 or to take the matter to the Ombudsman, detailing what will happen at each stage and timeframes for responding.	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our compensation policy & procedure has been updated to reflect the latest guidance issued by the Ombudsman. In addition, when Spotlight reports have been published these are reviewed and action plans devised to reflect where changes and improvements are required. When the Ombudsman issues a new determination a review meeting is held to identify what changes are required and this is cascaded to relevant staff to ensure that remedies identified meet best practice.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept. c. any findings of non-compliance with this Code by the Ombudsman.	Yes	Section 12 of the Complaints procedure outlines where Complaints are reported to. The Board paper on Complaints & Service Improvement is on the website and the Ombudsman annual report on landlords is reported to Board/RSC and the Residents' Forum once published and is also available on the Newlon website.	

	d. the service improvements made as a result of the learning from complaints. e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Procedure states in Section 12.3 'this is reported to the Board and then published on the website with the Board's response'. In previous years the Self-Assessment has been published on the website and reported to Board.	Action - This will be done following annual report to the Board in July.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	This is done when required.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords	Yes	N/A	

	must provide a timescale for returning to compliance with the Code.			

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaints Procedure states in Section 11.2 Feedback will focus on the service provided/complained about and be specific, measurable, achievable, realistic and timely (SMART). Learning may be about improving the complaints process but should also be about how we can reduce complaints and improve services. Learning from complaints meetings are held monthly with service leads to look at how we can improve services across the organisation looking at a range of data including identifying root causes as well as Ombudsman orders. Learning from Complaints is part of the regular reports to our Residents Services Committee.	
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 Procedure states in Section 11.2 Complaints provide senior staff and service managers and team leaders with an insight into day-to-day operations allowing them to assess effectiveness and drive service improvement by learning from: • Feedback from the service resolution team. • Stage 2 complaints review meetings. • Ombudsman cases discussed with senior managers and directors responsible. • Contract management meetings with contractors.	

			• Learning from complaints meetings. In addition, we report to our Executive team Self-assessments against the Spotlight reports and our progress on action plans arising from these.	
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 report to each Residents' Services Committee, and to residents in the newsletter, using examples such as 'You Said We Did'. We report to the Residents' Forum and use briefings to staff at All in Days to show how we have made improvements. In addition, we have a page on our website specifically on this. Learning from Complaints is part of our annual report to Board on Complaints also.	
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	Our Housing Service Director is the lead person. Systemic issues are reported to the Board via the Resident Voice report which is authored by the Executive Housing Director and goes to each Board meeting.	
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	Procedure reflects this in Section 12.4. Member of the Board appointed as MRC who is a resident.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's	Yes	The MRC has experience of complaints as was an active member of the Residents' Complaints Panel when this was the final stage of the complaints process at Newlon.	

	complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.		The MRC attends the monthly Leaning from Complaints meetings with service leads, which looks at trends in complaints, root causes, as well as learning from complaints data from complaints closed in previous month. The MRC are part of the Residents Services Committee and is a resident Board member.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling. c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Section 12 of the Complaints procedure details our reporting; each quarter the RSC receives a report covering all these aspects as outlined in the Code.	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.	Yes	All Service leads are clear on their roles and responsibilities in the management of complaints and the requirement to work collaboratively.	

	b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			