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# **The Housing Ombudsman Complaint Handling Code**

## **GCHA (Gravesend Churches Housing Association) – Self Assessment Review 2025**

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The Housing Ombudsman (HO) introduced the Complaints Handling Code in July 2020 which sets out good practice for landlords to deal with complaints effectively and fairly

In 2024, the HO, under new powers, updated its Complaint Code which came into effect on 1 April 2024. Landlords including GCHA must carry out an annual assessment against the Complaint Code and publish the results

Below is a copy of the HO Self-Assessment Complaint Code with GCHA's response following a review of the code in March 2025

This document should be considered in conjunction with GCHA's Comments, Compliments & Complaints Policy

Section 1:	Definition of a complaint		
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance
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	GCHA Comments, Compliment and Complaints policy (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	GCHA Comments, Compliment and Complaints policy (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	GCHA Comments, Compliment and Complaints policy (2.5) GCHA is a small HA and not able to capture or record all service requests as these are raised and addressed informally and we aim to respond to these at first point of contact. However, where we are aware of service requests, we will log, monitor and review in line with our regular complaints meetings.

<b>1.5</b>	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	GCHA Comments, Compliment and Complaints policy (2.5)
<b>1.6</b>	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	GCHA Comments, Compliment and Complaints Policy (7.0)  TSMs 2025/26 will have a clause included in the survey  Introduced as part of resident newsletters 2025/26
<b>Section 2:</b>	<b>Exclusions</b>		
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply Yes/No</b>	<b>Evidence of Compliance</b>
<b>2.1</b>	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	GCHA Comments, Compliment and Complaints policy (19.0)

<b>2.2</b>	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: <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	GCHA Comments, Compliment and Complaints policy (19.0)
<b>2.3</b>	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	GCHA Comments, Compliment and Complaints policy (19.0)
<b>2.4</b>	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	GCHA Comments, Compliment and Complaints policy (19.0)

<b>2.5</b>	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	GCHA Comments, Compliment and Complaints policy reflects a positive complaints culture in that we will consider each situation individually taking individual circumstances into account. Refer to (9.0) of the complaints policy.
<b>Section 3</b>	<b>Accessibility and Awareness</b>		
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply Yes/No</b>	<b>Evidence of Compliance</b>
<b>3.1</b>	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	GCHA Comments, Compliment and Complaints policy (11.0) providing different channels in which a customer can make a complaint and (27.0) where we take our duty seriously in line with the Equality Act 2010.
<b>3.2</b>	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	GCHA Comments, Compliment and Complaints policy (11.0). All GCHA staff have received complaints handling training which was last completed in August 2024. Annual complaints training to be delivered.

<b>3.3</b>	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	GCHA Comments, Compliment and Complaints policy promotes a positive complaints culture and welcomes ongoing feedback which is set out clearly throughout the complaints policy. We publicise our complaints policy and access to complaints via our website, the TSM's (2025/26) and resident newsletters.
<b>3.4</b>	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	GCHA Comments, Compliment and Complaints policy revised in August 2024 and is published on GCHA's website. In September 2025, we will also be publishing our complaints leaflet that summarises the complaint policy and how residents can make a complaint and or compliment to GCHA.
<b>3.5</b>	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	GCHA Comments, Compliment & Complaints Policy (14.0)
<b>3.6</b>	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	GCHA Comments, Compliment and Complaints policy (2.1) and (11.0)
<b>3.7</b>	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	GCHA's complaints policy reflects this throughout the policy. We also include it in our complaint acknowledgement letters/responses at escalation point from Stage 1-Stage 2.

Section 4:	Complaint Handling Staff		
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance
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	We are a small Housing Association Landlord. Everyone in the organisation has a role to play in complaint handling and management. However, we have an Executive Assistant that supports the wider operations team in complaint handling, including liaison with the HO and ensuring that complaints are monitored, weekly and monthly. Complaints are also reported quarterly to the board, and we have an MRC nominated Board Member who oversees complaints.
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	As above, the Executive Assistant co-ordinates the complaints handling, management process and has access to all staff at all levels to facilitate and prompt complaint resolutions. This is overseen by the Director of Operations. The staff have all had complaints handling training (August 2024) and are aware of the complaints handling process and complaints policy.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes	As above (4.2). Complaints are discussed weekly with key staff leading on complaint investigations and at the monthly staff performance meetings including lessons learnt. Minutes of these meetings are now in place to ensure there is an audit trail of discussions and lessons learnt followed up.

Section 5: The complaints handling process			
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance
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	GCHA Comments, Compliment and Complaints policy approved August 2024. GCHA operates one complaints policy which is written in line with the Complaints Code 2020 and reviewed under the Complaint Code 2024 in March 2025
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Where there is an area of dissatisfaction, or service request, we will as recommended by the HO log the request. Our initial aim is to resolve at the first point of contact and outside of the formal complaints process where the resident is happy to do so. We adhere to a two stage complaint policy process.
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	GCHA complaints policy is written in line with the HO Complaints Code 2020. We operate a two stage complaint 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	GCHA manages the complaint on behalf of the contractor, whereby the contractor will provide GCHA with an updated response on the complaint, by conducting their own investigation and provide a formal response to GCHA within the key complaint response times. GCHA will then respond to the resident. Where it is identified that the complaint is upheld, and a contractor failing, we will also work with the contractor to consider a compensation or 'goodwill' payment.



<b>5.5</b>	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We agree. However, we at GCHA manage and progress the complaint internally through its formal complaints policy/process. We do not expect our third party contractors to respond to the complaint, unless they wish to offer apologies for complaints upheld and or offer compensation. We sometimes receive MP enquiries, which are not complaints. These are logged separately and managed outside of the formal complaints policy.
<b>5.6</b>	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	A sample review of Stage 1 and 2 response letters were reviewed in 2025, and these have been updated to reflect the HO guidance.
<b>5.7</b>	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	GCHA has improved in this area and there are clear examples in the recent acknowledgement letters at Stage 1 and Stage 2, clarity on what the complainant remains dissatisfied with, and what part of the complaint we will respond to.
<b>5.8</b>	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 (C) take measures to address any actual or perceived conflict of interest (D) consider all relevant information and evidence carefully.	Yes	The complaints policy sets out a positive complaints culture, welcoming customer feedback, and creates every opportunity to respond to all complaints in a fair, objective way taking into account all points summarised in this recommendation.

<b>5.9</b>	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	GCHA Comments, Compliment and Complaints policy (12.0)
<b>5.10</b>	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	GCHA Comments, Compliment and Complaints policy (27.0)As part of investigating and responding to all complaints, or service requests, GCHA staff will consider the Equality Act 2010 and make any reasonable adjustments where required. We have not recorded any 'reasonable adjustments' in the past but will start keeping a record to this.
<b>5.11</b>	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	We promote a positive complaints culture and will aim to address all complaints we are presented with, unless there are clear grounds, reasons to refuse to escalate or progress a complaint through its formal complaints process. GCHA Comments, Compliment and Complaints policy sets out reasons why we may not escalate or respond to a complaint.
<b>5.12</b>	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 26 any relevant supporting documentation such as reports or surveys.	Yes	Evidence saved in individual folders under GCHA all staff - Documents/General/Complaints.

<b>5.13</b>	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	GCHA's complaints policy is written on the basis that where we can resolve at first point of contact we will. The policy also sets out clearly at Stage 1 and Stage 2 of the complaints process that we will seek to resolve without need to escalate. (12.0)
<b>5.14</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review	Yes	A separate and new Unacceptable Behaviour policy was approved by the Policy and Review group, April 2024. There is a clause in the complaint policy to reflect this.
<b>5.15</b>	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	GCHA's complaints policy sets out provisions of the Equality Act but also where unacceptable behaviour is in place, any restriction will be proportionate to the type of behaviour demonstrated. As stated, there is a new unacceptable behaviour policy in place pending approval from the Policy Review board panel committee in April 24.
<b>Section 6:</b>	<b>Complaints Stages - Stage One</b>		
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply Yes/No</b>	<b>Evidence of Compliance</b>
<b>6.1</b>	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	GCHA Comments, Compliment and Complaints policy (12.0)

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<b>6.2</b>	Complaints must be acknowledged, defined, and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	GCHA Comments, Compliment and Complaints policy (12.0)
<b>6.3</b>	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	GCHA Comments, Compliment and Complaints policy (12.0)
<b>6.4</b>	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	GCHA Comments, Compliment and Complaints policy approved June 2023. (12.0)
<b>6.5</b>	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This is included in the Complaints Policy (12.0) and included in our complaint responses where appropriate.
<b>6.6</b>	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	All outstanding actions are captured on the complaints tracker. We will ensure that the resident is regularly updated throughout their complaints journey so that when individual actions are completed, they are informed.
<b>6.7</b>	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.	Yes	This is an area that we have improved on in recent months with clear evidence within GCHA shared folder under 'Complaints & Compliments'. As part of this process, we will ensure that our responses continue to deliver 'simple English' so that our residents understand them. If we do need to quote any law, legislation we will be mindful of too long a response and also how we respond.

<b>6.8</b>	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	GCHA Comments, Compliment and Complaints policy approved June 2023. (12.0)
<b>6.9</b>	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; (E) the details of any remedy offered to put things right; (F) details of any outstanding actions; (G)details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This is evidenced in our complaint responses.
<b>Section 6: continued</b>	<b>Stage two of the Complaints process</b>		
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply Yes/No</b>	<b>Evidence of Compliance</b>
<b>6.10.</b>	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	GCHA Comments, Compliment and Complaints policy (12.2)

<b>6.11</b>	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	GCHA Comments, Compliment and Complaints policy (12.3)
<b>6.12</b>	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	This has been updated into the complaints policy (12.2) Complaint Escalation.
<b>6.13</b>	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is reflected in the Comments, Compliment & Complaint policy (12.3)
<b>6.14</b>	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	GCHA Comments, Compliment and Complaints policy (12.3)
<b>6.15</b>	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	GCHA Comments, Compliment and Complaints policy approved June 2023. (12.3)
<b>6.16</b>	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This is reflected in the Comments, Compliment & Complaint policy (12.3).

<b>6.17</b>	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	We agree. As part of our approach to complaint management, where more than one complaint included, we provide ongoing updates of the complaint throughout the journey of the complaint until all actions resolved. This includes regular communication and updates with the resident. There is evidence to show that we have certainly improved in the last 6 months. Evidence: Telephone call notes and email correspondence with complainants.
<b>6.18</b>	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	As part of our complaint responses we set out clear reasons for any decisions made, using legislation where applicable, although this has been more recent.
<b>6.19</b>	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; (G) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Examples may be found on our shared folder: GCHA All Staff - General/Complaints & Compliments/Complaints
<b>6.20.</b>	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	GCHA Comments, Compliment and Complaints policy (12.3)

Section 7: Putting things right			
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance
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: <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	GCHA Comments, Compliment and Complaints policy (9.0) In line with our positive complaints culture, our approach/responses consider all points set out in the HO recommendation (7.1)
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	GCHA Comments, Compliment and Complaints policy approved June 2023. (15.0). We also refer to our compensation policy where appropriate
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is reflected in our responses. To ensure that remedies proposed are followed through to completion, we review complaints on a weekly basis. Complaint letter outcomes. Examples may be found on our shared folder: GCHA All Staff - General/Complaints & Compliments/Complaints
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	GCHA Comments, Compliment and Complaints policy (15.0)



Section 8: Putting things right			
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: (A) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. (B) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; (C) any findings of non -compliance with this Code by the Ombudsman; (D) the service improvements made as a result of the learning from complaints; (E) any annual report about the landlord's performance from the Ombudsman; (F) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	GCHA published its first annual complaints performance and service improvement report in June 2024 and will complete the same process in July 2025 with the aim to meet its deadline 30 September 2025.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The annual complaints performance and service improvement report was reported to the Board in July 2025 for approval. It was agreed that the Director of Operations would lead on the complaints annual report with the nominated MRC with the aim to sign off and publish in line with the HO guidance.

<b>8.3</b>	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We carry out an annual self-assessment of the HO complaint code to ensure that we are continuously improving and compliant. Refer to (23.0) of the Comments, Compliment and Complaints policy. If we do complete a merger or structure changes, improvements we will also review the HO self-assessment as part of that process.
<b>8.4</b>	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Our complaints policy covers (part) of this under (23.0). However, as part of the next complaints review, we will include a section on the HO investigation. Currently it covers any area where HO finds non-compliance.
<b>8.5</b>	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	Not currently reflected in our complaints policy or processes. However, we will update this into our Business Continuity Plan under cyber incidents.
<b>Section 9:</b>	<b>Scrutiny and oversight: Continuous Learning and Improvement</b>		
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply Yes/No</b>	<b>Evidence of Compliance</b>
<b>9.1</b>	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 are reviewed at weekly meetings with key staff leading on complaints as well as the monthly staff meetings taking into account lessons learnt. Quarterly complaint reports also taken to the board and now reviewed with the new MRC board member. The new MRC attended the weekly complaint meeting on 28/03/2025 and regular meetings thereafter.

<b>9.2</b>	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	GCHA complaints policy promotes a positive complaints handling culture. (9.0). We reinforce this through our values, discussions on complaints during staff meetings and including front line staff as part of the weekly complaint review meetings. This was also reinforced as part of the complaints training on complaints August 2024.
<b>9.3</b>	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	GCHA complaints policy promotes accountability and transparency. The new RSP to review complaints as its first project in 2025. They were due complete this is 2024 but required further training before achieving confidence to lead on their first project. As stated above we report to the board quarterly and discuss complaint with staff and the new MRC board member overseeing complaints.
<b>9.4</b>	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	The Director of Operations is the senior lead person as accountable for complaint handling.
<b>9.5</b>	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	We have a nominated Board Member appointed to take a strategic oversight of complaints. Paul Sylva nominated in Jan 2025 after succeeding the previous MRC Eileen Jordan.

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 meeting was held with the new MRC Paul Sylva in March 2025. the DoOps is to send the MRC a copy of the updates HO self-assessment code checklist, complaints policy, MRC role expectations, and annual complaints report, and service improvement plan.
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; (D) annual complaints performance and service improvement report.	Yes	There is a new nominated MRC. The nominated MRC is still new to the role and has received an update on the role of the MRC, updated complaints policy, as well as a copy of the recent self-assessment annual review. Regular meetings to be set up from August 2025 where the DoOps will meet with the MRC to go through the complaints as outlined in the HO recommendation (9.7)
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; (B) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; (C) act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Managing and resolving complaints is part of staff performance objectives, plus we should also provide annual complaints training.