

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
Section 1: Definition of a complaint				
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	Complaints policy	The complaint definition is clearly stated within our complaints policy The SHS staff team (20 people in total) are aware of this definition and of the complaints policy, as they receive regular information relating to complaints, at least quarterly at all-team meetings
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy	Yes	Complaints policy	This is clear within our complaints policy; this information is shared with the SHS staff team and they are reminded of this periodically at all-team meetings
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly	Yes	Complaints policy Internal complaints log	A clear definition of a service request and of a complaint is given in our complaints policy. All service requests and complaints are recorded and monitored in our internal complaints log
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	Complaints log reflects this approach	This is in place with the SHS team and is reinforced with training / awareness sessions and through discussion when situations arise
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	Evidenced via satisfaction surveys e.g. transactional repairs surveys; contact made with resident to discuss any areas of dissatisfaction	When surveys are reviewed, any negative comment / feedback is addressed and contact made with the resident where possible. Residents are also made aware of the complaints policy and how to complain should they wish. It is important for SHS to use dissatisfaction to learn and to improve services / interactions with residents
Section 2: Exclusions				
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints policy	It is clear within our complaints policy that a complaint must be accepted unless there is a valid reason not to do so. Should we not accept a complaint, this would be clearly explained to the complainant, with SHS providing relevant information, support and signposting

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	Complaints policy	Exclusions are clearly stated within the complaints policy; below is a summary of when a complaint would be refused; more details can be found within our complaints policy: • The issue of the complaint occurred over twelve months ago • The matter has already been considered under the complaints policy • A resident complains about the behaviour of another resident (This would be dealt with under SHS' anti-social behaviour policy) • A resident complains about their level of rent and service charge e.g. they are unhappy with the amount of increase rather than believing it has been incorrectly calculated • It is a complaint about the decision of the review panel where decisions have already been reviewed and the complainant has had the opportunity of making submissions • The issue is subject to legal action or to an enforcement notice or other statutory notice • The complainant refuses to reasonably engage with SHS • Several related complaints are made which would be more effectively dealt with together rather than on an individual basis • Complaints made by SHS staff – these are dealt with under the grievance procedure through HR. However, the policy will apply if the member of staff is an SHS resident making a complaint about SHS' service
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	Complaints policy	The complaints policy was updated to reflect the change from 6 months to 12 months. This change was shared with the Board and the SHS team; the updated policy was also circulated to the team
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint	Yes	Complaints policy	It would be extremely rare for SHS not to accept a complaint. However, should this happen, the reasons would be clearly explained to the complainant, with SHS providing relevant information, support and signposting. SHS would comply with a decision made by the Ombudsman to take on a complaint
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint	Yes	Complaints policy	We have not refused any complaints; however, we would consider the individual circumstances of each complaint.
Section 3: Accessibility and Awareness				

3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process	Yes	Complaints policy Residents' Charter	We provide a variety of ways to make a complaint - in person on site / in person at the office / in writing via email, letter or text / by phone to the main office or an individual member of the SHS team / via digital means e.g. using the website form or the Resident App.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord	Yes	Complaints policy shows various employees recording service requests / complaints	Our complaint policy and procedure is part of our induction programme for new starters. Complaints are shared at quarterly all-team meetings with learning from complaints discussed. As a small team, all colleagues are aware of the appropriate team members dealing with complaints
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	Discussed with the wider team at quarterly KPI meetings	In percentage terms for 2024 / 2025, the 11 complaints received equates to 2% of residents (this is up from 1% in the previous year); the 18 service requests relates to 3.5% of residents (this is up from 2% in the previous year)
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website	Yes	Complaints policy SHS website: suttonhousingsociety.co.uk	The complaints policy is available on our website. The policy and the Ombudsman service is promoted on the digital noticeboards located within our older people schemes (80% of our homes). We also highlight complaints to all residents through regular articles in our newsletter, Sutton Scoop, and in the Annual Report
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	This is included in the aims & objectives section of the Complaints policy	This information was introduced into our complaints policy when it became a requirement via the HOS code
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; with additional time given if necessary	Complaints can be made by an advocate, friend or family member, with the residents' permission; these people may be present at any meetings, with reasonable adjustments being made where necessary
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	Complaints policy Information on digital noticeboards information in resident newsletter information on website Information is included in the complaints letters	This information was introduced into our complaints policy with the introduction of the Housing Ombudsman Service (HOS) Code. Information is included in letters to residents regarding complaints at each stage. The HOS is advertised in our resident newsletter, Sutton Scoop, on our website and on our digital noticeboards located within our older people schemes
Section 4: Complaint Handling Staff				
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	Complaints policy reports newsletter website All employees are aware that this role sits with the Operations Director	The complaints officer role sits with the Operations Director, in addition to other duties. All SHS employees are aware of this. This information is openly shared / promoted with residents

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	The Operations Director is a member of the senior management team	The Operations Director works with colleagues from across all areas of the SHS business. As a member of the senior team, the Operations Director has the authority and the autonomy to make decisions and to resolve disputes as quickly and as fairly as possible
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	All employees are aware of the complaints policy and process. All receive overview training and attend quarterly meetings where complaints are discussed. All employees are aware of priority of complaints and of the associated timescales	Complaints aren't seen as one person's role; the SHS team know that whilst the Operations director carried out the complaints officer role, all SHS employees are responsible for complaints. The annual complaints report, approved by the Board in May 2025, was shared with the SHS team following an all team meeting. Complaints are a standing item on team agenda as well as awareness raising, improving and learning from complaints.
Section 5: The Complaint Handling Process				
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	One policy in place; all SHS colleagues are aware. Residents are not treated differently if they complain; complaints log records all complaints received
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion	Yes	Complaints policy (2-stage approach)	The SHS complaints policy is a two-stage policy
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	Complaints policy	This does not apply to SHS as we operate a two-stage complaints policy
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes	Yes	Complaints policy is clear that any third party complaint must be addressed in line with the SHS policy	SHS handles all complaints, as per our policy. Where we seek feedback from contractors, SHS remains the lead to address the complaint
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code	Yes	Complaints policy is clear that any third party complaints must be addressed in line with the SHS policy	As SHS retains control of all complaints received, we would ensure any contractor information, feedback etc required, is managed in line with our policy and the HOS code
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification	Yes	Communications with residents; the complaint definition is outlined in the acknowledgement letter to the complainant	The complaint definition is included in our acknowledgement letters. Where this is not clear, residents are asked for clarification
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear	Yes	Communications with residents	Letters are usually reviewed by the Operations Director to ensure all aspects of the complaint are addressed. If any areas fall outside our responsibility, these would be clearly detailed, and relevant support / signposting provided to the complainant

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; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully	Yes	Part of our process / working practises	Dealing with complaints fairly, engaging with residents, discussing their complaint, expectations and anticipated outcomes and reviewing the situation carefully is all part of our approach to complaint handling. This fits with the values of the organisation, which include accountable, kind, personal and listen
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	Internal complaints log Communications with resident	Any deviation from the policy timescales are discussed and agreed with residents and noted on the complaints log and in communications with the complainant
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review	Yes	Complaints policy Internal complaints log	The complaints log maintained at SHS records any reasonable adjustments needed or made. The log does not specifically record the disability of the complainant as this information is held within our housing management IT system
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code	Yes	Complaints policy	Escalation of complaints is included within the complaints policy. This requirement is reinforced with SHS colleagues as part of their complaints learning
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	Internal complaints log; all correspondence is saved digitally	This information is maintained within the annual complaints log. The information is reviewed every month and a summary of the information shared quarterly with the SHS team, Board and Housing Operations Committee (HOC). This includes number of complaints, tenure, nature of complaints, resolution and outcome
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation	Yes	Complaints policy	We wish to remedy any dissatisfaction / complaints as soon as is reasonably possible, and for any on-going solutions to be sustainable
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review	Yes	SHS reviewed its previous policy and replaced it with the current "Managing unacceptable behaviour" policy introduced in April 2025.	A new policy for managing unacceptable behaviour was reviewed and agreed by the HOC; it was introduced in April 2025
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	Internal discussions include any mitigating factors are taken into account which includes any protected characteristics	Our internal systems enable SHS to ensure any restrictions are reviewed regularly and are proportionate, with any restrictions removed as early as is reasonably possible
Section 6: Complaints Stages: Stage 1				

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	Led by the Operations Director with support from the Executive Assistant	Most stage 1 complaints take less than our 10 working days timescale to resolve. For 2024 / 2025, the average response time for all complaints, stage 1 & 2 combined, was 6 working days
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	Resident communications Internal complaints log	This is part of our complaints policy and is recorded in our complaints log, with letters saved on our IT system to support this
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged	Yes	Resident communications Internal complaints log	This is part of our complaints policy and is recorded in our complaints log, with letters saved on our IT system to support this
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	Complaints policy Resident communications complaints log	Internal This is part of our complaints policy and is recorded in our complaints log, with letters saved on our IT system to support this. Any extension is discussed with residents
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	Resident communications	This is highlighted by the Operations Director to the relevant employee responding, if complaints cannot be responded to within the agreed timescale. The HOS contact information is provided in our complaints letters at every opportunity
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	Resident communications Internal complaints log	Complaints are responded to as per the complaints policy. Where additional actions are required, these are outlined and shared clearly with residents. Regular updates are then provided to reassure residents that matters are in hand, as individual actions are completed and when issues are fully addressed
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	Resident communications	The complaints letters are bespoke, addressing all areas of the complaint and providing residents with the opportunity to discuss any concerns etc. together with providing information relating to the HOS
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	Resident communications Internal complaints log	We include all issues raised as part of the complaints in our response, whether in the original complaint or as a result of discussions with the resident. Should new issues arise following the response being issued, if unrelated to the complaint, a new complaint is recorded

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; 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	Resident communications	All information is included in our complaint response letter, together with information relating to the HOS. This is recorded in the complaints log and the letters saved to our resident's file on the IT system
Stage 2				
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response	Yes	Complaints policy	Information regarding escalation to stage 2 is provided in the stage 1 outcome letter to residents. Escalation is recorded on our complaints log
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	Resident communications Internal complaints log	This is part of our complaints policy and is recorded in our complaints log, with letters saved to our resident's file on the IT system
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response	Yes	Complaints policy	This is part of our policy and was discussed with SHS employees when it was introduced. It is not always clear initially what the reason for escalation is, particularly where a complaint is upheld, although with the complainant
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1	Yes	Generally, stage 2 complaints are escalated to the Operations Director or to the Chief Executive if the Operations Director has been previously involved	As a small organisation compliance with this requirement can be a challenge. However, should the Operations Director have been involved at stage 1, the stage 2 complaint is dealt with by one of the two other members of the senior team e.g., the Chief Executive or the Resources Director
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged	Yes	Resident communications Internal complaints log	The SHS policy requires the stage 2 complaint to be addressed within 10 working days of the complaint being received. Final responses are recorded in our complaints log, with letters saved to our resident's file on the housing management IT system
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	Resident communications Internal complaints log	This is highlighted by the Operations Director to the relevant colleagues, if complaints cannot be responded to within the agreed timescale. Information regarding contact with the HOS is provided to residents where any extension of time is made
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	Resident communications	Information regarding contact with the HOS is provided in all complaints correspondence from us, as well as when discussing any extension

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	Resident communications Internal complaints log	Complaints are responded to as per the complaints policy. Where additional actions are required, these are shared with residents. These actions are monitored to ensure they are progressed and comply, with updates issued to the complainant as actions are completed and when issues are fully addressed.
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	Resident communications	The complaints letters are bespoke, addressing all areas of the complaint and providing residents with the opportunity to discuss any concerns etc. together with providing information relating to the HOS
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; & g. matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Resident communications	All information is included in our complaint response letter, together with information relating to the HOS. This is recorded in the complaints log and the letters saved to our resident's file on the IT system
6.2	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response	Yes	Internal complaints log	All relevant SHS employees are involved in the final response. This helps to ensure a full response with all aspects of the complaint addressed.
Section 7: Putting things right				
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	Complaints policy Resident communications	We will always contact the individual concerned where we have got something wrong. Firstly to issue a genuine apology and secondly to advise what steps / actions we have taken / will take to rectify the situation / explain what happened etc. This can include amending records, providing compensation, updating procedures etc. In addition, all employees are able to arrange for cards, flowers etc to be issued to residents when we get something wrong
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified	Yes	Complaints policy Resident communications	SHS has a compensation and other payments policy. However, every situation is reviewed and considered on its merits, taking into account resident expectations, impact of the issue etc.
7.3	The remedy offered 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	Resident communications Internal complaints log	This is set out in writing to the resident and maintained in the complaints log, which is reviewed on an at least fortnightly basis. No cases are closed until all actions have been completed

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies	Yes	SHS makes use of the HOS resources / website	The Complaints Officer regular reviews the spotlight and the insights reports on the HOS website, taking particular account of any best practise, remedies by other landlords etc.
Section 8: Putting things right				
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	Report presented to the Board in May each year with the annual complaints performance and service improvement report. Quarterly performance reports to the Board and to the Housing Operations Committee includes summary details of complaints / service requests received	The report issued to the Board for approval in May each year includes the self assessment against the HOS Code, highlighting areas of improvement, changes needed etc. The report provides full details of all complaints, how they were addressed and the outcomes, together with improvements introduced as result of the learning from complaints. The report compares performance from previous years, highlighting improvements and challenges, together with any trends if present. When relevant, the report would also include information from the HOS such as findings of non-compliance with the Code, any notices or reports received from them
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	Board reports and minutes website Submission to the HOS	SHS The complaints report presented annually to the Board, together with their response, is available on our website
8.3	Landlords must also carry out a self assessment following a significant restructure, merger and/or change in procedures	Yes	This has not been necessary at SHS	It has not been necessary to carry out additional self-assessments against the Code as there have been no significant events / changes at SHS
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation	Yes	This has not been necessary at SHS as at July 2025	In October 2025, the HOS contacted SHS on 13.10.25 and advised that we needed to provide commentary / explanations in more detail within this self-assessment. This has been actioned and the HOS was advised on 16.10.25
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	This has not been necessary at SHS	SHS has been able to comply with the HOS Code, as required.
Section 9: Scrutiny & oversight: continuous learning and improvement				

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	This is considered when reviewing all complaints / service requests	Updating, amending, changing policies and procedures are considered with all individual complaints. This is also considered when reviewing complaints as a whole
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	This is part of our collaborative working approach	A positive approach to addressing complaints is encouraged at SHS. As a small organisation, with only 20 employees, it's a challenge for employees not to take complaints personally. However, positive reinforcement, training and awareness raising relating to complaints is part of our culture. We listen and want to improve, and respond accordingly
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 committee	Yes	Regular reports are provided to our Board and the Housing Operations Committee (HOC)	Details of complaints received each quarter are provided to our Board and to the HOC; this includes remedies, outcomes, any compensation payments. The Board and HOC also receive an annual report detailing complaints, outcomes, learning, service improvements, payments made etc. Summary information is shared in our annual Report and in our resident newsletter, Sutton Scoop
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	This is the Operations Director, one of the three senior managers at SHS	The Operations Director has the Complaints Officer role within their remit. The Operations Director reviews all complaints and service requests received. This includes looking for trends, risks, changes needed to policy etc. Any themes / trends/ improvements are highlighted in reports
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	This is our Board Chair	The Board chair was appointed to the Member Responsible for Complaints (MRC) role in 2023
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	Reports received quarterly to the Board	All information relating to complaints is available for the MRC. Complaints are discussed at every Board meeting. Where necessary the MRC will discuss complaints with the Chief Executive at their catch up meetings
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	Board reports Annual summary and report	The MRC and the rest of the SHS Board regularly receive information on the number of complaints received, the topics of the complaints, the complaint remedies and their outcomes. Any trends or concerns would be discussed. The MRC and board members also receive and review the annual complaints report. Should it happen, any outcome of HOS involvement with SHS relating to severe maladministration would be reported.

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 cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	All employees have an objective relating to collaborative working (Be the body ...) which includes our approach to addressing complaints, taking responsibility, seeing things through to resolution etc.	At SHS, all employees understand our collaborative approach, which is part of our values <i>Accountable...Be the body that makes a difference, be proud of what we do and take personal responsibility to get things done, contributing to a culture of expectation to achieve and grow</i> We monitor this through our 121 meetings with employees. We undertake training and awareness raising sessions to keep this at the centre of what we do, for the benefit of our residents. This includes our approach to complaints handling, and being professional in all that we do.
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Completed 14.07.25

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