

Our Self-Assessment against the Housing Ombudsman Complaints Handling Code – April 2026

Section 1: The definition of a complaint.				
Code Provision	Code Requirements	Compliant 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	Section 1 ('Definitions') states: A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, our staff, or those acting on our behalf affecting an individual or group of individuals.	The words 'landlord' and 'residents' have been replaced with 'organisation' and 'individuals' as Waythrough delivers a range of services including housing.
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	Section 1 ('Definitions') states: The person does not have to use the word complaint in order for it to be treated as such. Complainant is the person making the complaint. This may be a person who uses our services, third-party making the complaint on behalf of a person who uses our services, a representative of another organisation or a member of the public. Section 4.4.3 ('Support and Assistance to Complain') states: Complaints from third parties acting on behalf of complainants will be accepted with the consent of the complainant, or where the person who uses our services cannot complain unaided and cannot give consent because they lack capacity within the meaning of the Mental Capacity Act 2005.	

Section 1: The definition of a complaint.				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Sections 4.3 (Identifying and Addressing Concerns / Service Requests) and 4.4.1 (Identifying Complaints) clearly outline the distinction between these processes. They also confirm that all such matters are recorded internally to enable monitoring for trends and to identify issues that may require further action.	Waythrough uses the term 'concerns' to describe 'service requests'; however, service requests relating to housing complaints are also referenced within the policy.
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	Section 4.3 (Identifying and Addressing Concerns / Service Requests) states: 'If the person is not satisfied with the action taken or our approach to resolving their concern/ service request, they will have the opportunity to make a complaint.'	
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	Section 4.1.4 (Promotion of the Complaints and Feedback Policy) states: Information about how to provide feedback and make complaints will be promoted to people who use our services, and other stakeholders via handbooks/welcome packs for people who use our services, posters/leaflets, service newsletters, social media and surveys.	

Section 2: Exclusions				
Code Provision	Code Requirements	Compliant 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	Section 4.4.2 (Reasons that Complaints will not be Accepted) states: All complaints will be accepted unless there is a valid reason not to do so. In which case, Waythrough will provide a clear explanation and either address the issues through a more appropriate process or signpost to alternative complaint routes or contact details for Ombudsman where applicable.	
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	Section 4.4.2 (Reasons that Complaints Will Not Be Accepted) sets out the fair and reasonable circumstances in which a matter will not be considered a complaint or progressed, exactly as required. The section sets out examples of circumstances in which complaints will not be accepted and confirms that these align with the acceptable exclusions set out in the Code.	

Section 2: Exclusions				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.4.2 (Reasons that Complaints Will Not Be Accepted) states: Something that happened, or which the individual knew happened more than 12 months ago. This does not include complaints about safeguarding or Health and Safety issues which will always be investigated. Waythrough will use discretion to accept complaints made outside of this time limit if there are good reasons to do so.	Accept complaints within 12 months – Covered by implication (Section 4.4.1 – time limit clause) 12 months from occurrence or awareness – Covered by explicit wording Discretion for late complaints –Covered by explicit discretion statement Fair and reasonable exclusions – safeguarding exclusions, explanation duty

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	Section 4.4.2 (Reasons that Complaints Will Not Be Accepted) states that all complaints will be accepted unless there is a valid reason not to do so. In which case, Waythrough will provide a clear explanation and either address the issues through a more appropriate process or signpost to alternative complaint routes or contact details for Ombudsman where applicable. Section 4.4.2 also states that if a person explicitly states that they wish to make a complaint, but the complaint is not accepted on the above grounds, we will provide a clear and detailed response and details of the relevant Ombudsman (where applicable).	The acknowledgement that the Ombudsman has powers to require the acceptance of a complaint is not explicit but is implied.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 4.1.2 (Key Points) states that each complaint will be considered on its merits. Section 4.4.1 (Identifying Complaints) states that all complaints will be accepted unless there is a valid reason not to do so. Section 4.4.2 (Reasons that Complaints Will Not Be Accepted) states that we will use discretion to accept complaints made outside of this time limit if there are good reasons to do so	The detailed sections of the policy together explicitly rule out a blanket or automatic approach and require complaint handlers to assess the circumstances of each case, exercise judgement and discretion and justify and document any decision to exclude.

Section 3: Accessibility and Awareness				
Code Provision	Code Requirements	Compliant 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	Section 4.2 (How we can receive feedback) gives examples of how feedback can be provided through multiple channels including in person to any staff member or volunteer, by letter, by telephone, by email (central and service-specific addresses), via the organisation's website, via social media or through a representative (family member, advocate, solicitor, etc.) Section 4.4.3 (Support and Assistance to Complain) explains what support and assistance can be made available including reasonable adjustments. Section 5.1 (Associated Policy – Equality and Diversity) states that we positively promote Equality and Diversity, delivering our services in line with the Equality Act 2010.	Waythrough's Incident Management system includes a free-format text field that allows the person recording the complaint to capture any reasonable adjustments required. All Waythrough policies include an Equality Statement
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	Yes	Section 4.2 (How we can receive feedback) gives examples of how feedback can be provided through multiple channels including in person to any staff member or volunteer, Section 3 (Responsibilities) details roles and responsibilities and states that the workforce have a responsibility to be familiar with	The policy confirms that: All employees and volunteers receive training in identifying and responding to complaints and feedback

	pass details of the complaint to the appropriate person within the landlord.		the content of the policy, identify feedback and record it or pass it on appropriately. Section 3 also states that managers are responsible for ensuring the staff work within the policy, are appropriately trained and have a responsibility for promoting aware of how to make a complaint with service.	All managers must complete complaint-handling training before acting as Complaint Handlers
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	Waythrough's positive approach to complaints and learning culture is explained in Section 4.1 and Section 4.1.1 4.1 states 'Complaints and other feedback are valued as a vital tool for developing and improving our services' 4.1.1 states that Waythrough views complaints positively, as an opportunity to put things right if they go wrong and improve our services Sections 4.1 and 4.1.1 reject a negative interpretation of complaints and align with the Ombudsman's position that higher complaint volumes may indicate accessibility and trust, not service failure.	The policy requires quarterly reporting on numbers, trends and outcomes of complaints, reviewed at service and governance meetings and that complaint data is used to drive improvement. This evidences that complaint volumes are analysed and used as insight.

Section 3: Accessibility and Awareness				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.1.4 of the policy states 'Our services will ensure that information will be made available in accessible formats and other languages on request'. Section 4.4.3 states 'We will ensure that reasonable adjustments are made to accommodate an individual's needs. We will ask what reasonable adjustments people need and not make assumptions. The policy explicitly confirms a two-stage process. In Section 4.12 'Our Complaint process has only 2 stages. People will be signposted to alternative complaint options if they still are dissatisfied'. Stage 1 of the complaint handling process is laid out in section 4.5 and stage 2 in 4.6. Section 4.1.4 states that the policy is published on Waythrough's website and can be made available in other formats.	The Complaints Policy is published on the complaints page of the Waythrough website and has a tool that enables translation. The text format can also be adjusted to suit the needs of the reader. A summary of the two-stage process is published alongside to further support accessibility.

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	Section 4.1.4 details how the policy will be promoted including via handbooks/welcome packs for people accessing services, posters/leaflets in reception areas, service newsletters, social media, and surveys. Section 4.6.3 states that at the end of the two-stage complaints process 'our residents will always be provided with details of how to escalate the matter to the Housing Ombudsman Service if the individual remains dissatisfied' Section 4.1.4 states 'People making complaints will be informed about relevant Ombudsman schemes that are available to them in line with the requirements of those schemes.' Section 4.1.3 details compliance with the Housing Ombudsman's Complaint Handling Code 2024, alongside the completion of this self-assessment to be published annually and available to all residents.	Contact details for the Housing Ombudsman are included in template letters for correspondence relating to complaints.
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	Section 4.2 states that residents can raise complaints through another person, stating 'Through another person such as a family member, friend, advocate, solicitor or other professional they are working with. We will need to have consent to discuss the complaint with that person.' Section 4.4.3 reinforces acceptance of third-party representations stating 'Complaints from third parties acting on behalf of complainants will be accepted with the consent of the complainant, or where the person who uses our services cannot	The policy meets the Housing Ombudsman requirement by explicitly allowing representatives to act on a resident's behalf, by allowing residents to be represented or accompanied at any meeting, by applying appropriate safeguards

			complain unaided and cannot give consent because they lack capacity within the meaning of the Mental Capacity Act 2005' Section 4.4.3 states 'Complainants may also be represented or accompanied by a suitable person at any meeting with us'	around consent and capacity and by embedding this right within the support and reasonable adjustment framework.
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	Section 4.1.4 explicitly states the residents will be told about the Ombudsman schemes – 'People making complaints will be informed about relevant Ombudsman schemes that are available to them in line with the requirements of those schemes.' Section 4.6.3 ensure signposting to the Ombudsman is mandatory at point of closure stating 'Our residents will always be provided with details of how to escalate the matter to the Housing Ombudsman Service if the individual remains dissatisfied'	Residents are informed throughout the complaint journey of their Ombudsman rights. Contact details for the Housing Ombudsman are included in template letters for correspondence relating to complaints. The right to make a complaint is included in occupancy agreements and resident welcome packs.

Section 4: Complaint Handling Staff				
Code Provision	Code Requirements	Compliant 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	Section 1 states that 'The Complaint Handler is the manager responsible for the investigation of the complaint, communication with the Complainant, and taking action to resolve the issues identified ' Section 3 further states that complaint handlers are 'responsible for ensuring that their handling of complaints is compliant with this policy, and therefore all regulatory requirements' Section 3 also states that 'a member of the Quality & Performance / Quality & Compliance Teams will liaise with the Housing Ombudsman to ensure compliance' Section 3 also states that 'The Member Responsible for Complaints (MRC) is a member of the Board who is responsible for ensuring the Board receives regular information on complaints that provides insight to the governing body on our complaint handling of complaints made by Residents.'	The policy fully meets the code requirements by assigning clear responsibility for complaint handling, designating a team responsible for Ombudsman liaison, ensuring regular reporting to and oversight by the Waythrough governing body and embedding these responsibilities within structured governance framework.
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	Section 3 states that 'Complaint Handlers will have access to staff at all levels to facilitate the quick resolution of complaints.' Section 4.5.1.3 states that 'The Complaint Handler will be a manager, who has completed training and has sufficient authority to put any issues right. Section 4.5.1.3 reinforces the autonomy of the complaint handlers stating 'The Complaint Handler is responsible for the	The policy fully meets this Code requirement. It clearly establishes that the complaints officer function has direct access to staff at all organisational levels, is granted sufficient

			investigation of the complaint, communication with the Complainant, and taking action to resolve the issues identified (where applicable). Complaint handlers will deal with complaints on their merits, act independently, and have an open mind and takes measures to address any actual or perceived conflicts of interests’.	authority and autonomy to resolve complaints, operates independently, fairly, and without undue restriction and is structurally enabled to resolve disputes
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	Section 4.1 frames complaints as integral to service delivery and treatment stating, ‘Complaints and other feedback are valued as a vital tool for developing and improving our services.’ And ‘Waythrough view complaints positively, as an opportunity to put things right if they go wrong and improve our services.’ Section 4.9.2 states ‘Complaints, Concerns / Service Requests, Comments and Compliments will be recorded ... This allows us to identify trends and drive improvement in service delivery Section 4.9.1 sets out training expectations stating, ‘All employees and volunteers will complete training in identifying and responding to complaints, concerns and other feedback in line with the requirements of their role’ and ‘All managers will complete complaint handling training before they act as a Complaint Handler. Section 4.4.8 confirms “‘To prioritise complaint handling, all staff will be suitably trained; have protected time to avoid delays; and consideration will be given to any planned leave, any actual or perceived conflict of interest.”	The policy fully meets this requirement by explicitly valuing complaints as essential to service quality, embedding learning from complaints at all levels, mandating training for all staff involved and providing evidence that complaint handling is resourced, prioritised and governed.

Section 5: Complaint Handling Process				
Code Provision	Code Requirements	Compliant 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	Section 2 (Scope) of the policy states: 'The policy relates to all activities of Waythrough unless agreed partnership or contractual arrangements specify an alternative procedure.' Section 4.1.1 states: 'We will encourage and support people through the complaints process and ensure complainants are not discriminated against or victimised – the service a person receives will not be negatively affected if they make a complaint, or if somebody complains on their behalf'. All Waythrough policies include an equality statements which states 'All customers, employees and members of the public should be treated fairly and with respect...'	The policy evidence equality and fairness safeguards throughout.
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	Section 4.3 promotes early, local resolution prior to issues escalating into formal complaints stating 'We encourage staff to proactively resolve issues at the earliest opportunity, to the person's satisfaction. This can prevent the need for a complaint to be made', 'Our staff speak to people who use our service every day. We encourage people to discuss any issues they have, as we can often reach a quick and effective resolution to dissatisfaction' and 'When concerns / service requests are raised, staff will attempt to resolve the issue immediately to the person's satisfaction.'	

			Section 4.1.2 of the policy is explicit about the structure of the complaints process stating 'out complaint process has only 2 stages'	
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	Section 4.1.2 of the policy is explicit about the structure of the complaints process stating 'out complaint process has only 2 stages' Section 4.5. confirms the first formal stage of the complaints process. Section 4.6 confirms the second formal stage of the complaints process.	The policy operates a strict two-stage complaints process and explicitly excludes any additional stages.

Section 5: Complaint Handling Process				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.1.3 directly addresses complaints involving third parties stating that '[Where we work in partnership] a local written procedure will be put in place to: Avoid any confusion about how complaints will be dealt with and by whom, including the roles and responsibilities of each organisation, Enable oversight of complaints received and their resolution to ensure that the appropriate process is being followed and Ensure that individuals are not required to go through two complaints processes Section 4.1.2 of the policy is explicit about the structure of the complaints process stating 'out complaint process has only 2 stages'	Complaint Handlers for housing complaints would seek input from the third party and this will be included in the investigation as part of the two stages complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 4.1.3 directly addresses complaints involving third parties stating that '[Where we work in partnership] a local written procedure will be put in place to: Avoid any confusion about how complaints will be dealt with and by whom, including the roles and responsibilities of each organisation, Enable oversight of complaints received and their resolution to ensure that the appropriate process is being followed and Ensure that individuals are not required to go through two complaints processes. Section 4.1.3 confirms landlord responsibility stating 'Where we are the lead provider, delivery partners' compliance with the	The policy meets the requirement by making it clear that the landlord retains responsibility for complaint handling at all times, third parties must operate within the landlord's complaints process, Compliance with the Housing Ombudsman Code is actively overseen and enforced and

			agreed complaint process [will be ensured] via contract management processes.'	Accountability cannot be delegated, even where delivery is outsourced
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	Section 4.5.1.1 requires that, when a complaint is logged at Stage 1, the landlord sets out its understanding of the complaint and outcome sought, stating 'All complaints will be acknowledged in writing, by letter or email, within 3 working days. This letter will include: Our understanding of the complaint – we may need to contact the person to gather further detail, The outcome that the person would like, what will happen next and by when and the name and contact details of the Complaint Handler Section 4.5.1.4 makes clear that understanding and clarifying the complaint is an active responsibility stating '[The complaint investigator will] Speak with the complainant to ensure that we: fully understand the issues raised and the outcome they would like, agree how and when we will keep them updated and explain what happens next and what evidence we plan to review'	

Section 5: Complaint Handling Process				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.4.6 states 'When reviewing complaints which include issues relating to other organisations outside of a partnership, Complaint Handlers should clarify with the complainant, which of the key points our organisation is responsible for investigating. The complainant should be supported to raise other concerns with the relevant organisation.' Section 4.5.1.1 requires that, when a complaint is logged at Stage 1, we will define the scope of the responsibility and make clear what is needed, stating 'All complaints will be acknowledged in writing. Including.... our understanding of the complaint'. Section further embeds clarification as part of the investigation process stating 'Speaking with the complainant to ensure that we ... fully understand the issues raised and the outcome they would like"	The policy fully meets the requirements by ensuring at both stage 1 and 2 that the landlord sets out its understanding and scope of the complaint and clarifies responsibility boundaries.
5.8	At each stage of the complaints process, complaint handlers must: - deals with complaints on their merits, act independently, and have an open mind. - gives the resident a fair chance to set out their position. - takes measures to address any actual or perceived conflict of interest; and	Yes	Section 4.5.1.3 requires impendence and merit-based decision-making stating that 'Complaint handlers will deal with complaints on their merits act independent and have an open mind'. Section 4.5.1.4 requires direct engagement with residents stating "Speaking with the complainant to ensure that we: fully understand the issues raised and the outcome they would like, agree how and when we will keep them updates and explain what happens next"	

	d. considers all relevant information and evidence carefully.		Section 4.5.1.3 makes conflict management a mandatory duty stating, 'Complaint handlers will... take measures to address any actual or perceived conflict of interest.' Section 4.5.1.3 also states 'Complaint handlers will ... 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	Section 4.5.1.2 states 'Occasionally, it will not be possible to meet those timescales, for example, if the complaint relates to more than one team or is complex and requires a longer investigation.' "Where this is the case, we will explain to the complainant and agree a revised timescale for keeping them updated." And "Any extension should not exceed 10 working days and should not delay actions to put things right.	The policy evidences that exceeding timescales is exceptional and not routine, residents are informed promptly, update intervals are agreed and not imposed, and communication continues throughout the extended period. The Hub recording system has a text box to capture any agree extension and contact arrangements.

Section 5: Complaint Handling Process				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.4.1 explicitly commits to making reasonable judgements stating, 'We will ensure that reasonable adjustments are made to accommodate an individual's needs' and "We will ask what reasonable adjustments people need and not make assumptions. Section 4.4.1 also states 'We will record reasonable adjustments on the complaint record...' and '...and keep these under review to ensure they continue to meet the person's needs.' All Waythrough policies include an Equality Statement which states 'All customers, employees and members of the public should be treated fairly and with respect, regardless of age, disability...' .	The Hub recording system has a text box to capture any agreed extension and contact arrangements. The policy evidences compliance by ensuring that reasonable adjustments are proactively offered, properly recorded and adjustments are reviewed and re-assessed.
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	Section 4.4.1 of the policy states 'All complaints will be accepted unless there is a valid reason not to do so' Section 4.4.1 also states that 'If a person explicitly states that they wish to make a complaint, but the complaint is not accepted on the above grounds, we will provide a clear and detailed response and details of the relevant Ombudsman' Section 4.1.2 states: 'Complaints will not be refused unless there are valid reasons for doing so. Each complaint will be considered	The policy complies with the requirements by ensuring that complaints are not prevented from progressing through all stages without valid reasons and any refusal to escalate is exceptional, justified, explained and recorded.

			on its merits and reasons for not accepting these will be clearly communicated and documented.	Residents are always informed of their right to approach the 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	Section 4.9.2 of the policy states 'Complaints, Concerns / Service Requests, Comments and Compliments will be recorded on the relevant recording system' Section 4.5.1.3 states 'Complaint handlers will... record the investigation, outcome and all correspondence with the complainant on the relevant recording system.' Section 4.5.1.8 states ""All contact with the complainant will be recorded on the relevant information management system, and correspondence uploaded as attachments."	The policy confirms that a complete, auditable record is kept of all complaints and feedback. A quality assurance approach is taken of these records by members of the Quality and Compliance Team who are automatically added to a complaint when one is recorded for oversight and support.

Section 5: Complaint Handling Process				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.7 of the policy states 'Redress can take a number of forms' and 'This can be arranged at any stages of the process and does not need to wait until the complaint has been closed'. This section also states "Where service failings have been identified which have disadvantaged the person, attempts should be made to put the complainant back in the position they were in before the error occurred." Section 4.5.1.4 confirms that action should be taken as soon as issues are identified stating 'where possible we will do this when they are identified, without the need to wait for the outcome of the complaint.' Section 4.4.8 states that the complaint handler will be a manager 'with sufficient authority to put any issues right, should the complaint be upheld.' Section 4.7 confirms learning and action from complaints at any stage stating 'Any failings should be acknowledged and remedied quickly and fairly...' and "Any further actions that need to be completed after the person has been informed of the outcome will continue to be tracked."	The policy conforms that complaints can be resolved and remedied at any stage, residents do not need to escalate to obtain appropriate redress and that actions are taken as soon as failings are identified.

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	Section 4.4.9 provides information on our approach to 'Unreasonable Complainant Actions' stating 'Unreasonable actions are those which, because of the nature or frequency of contact with an organisation, hinder the organisation's delivery of services or consideration of complaints.' Section 4.4.9.1 makes it clear that judgement is context specific and states 'that there is no universal measure for when actions may be classed as unreasonable. The circumstances of each complaint and complainant will be considered. Section 4.4.9.2. states that complaints handlers must ensure "Reasonable adjustments for equality, diversity and inclusion have been fully considered and there are no cultural, language, health or disability barriers which still exist that explains the unreasonable behaviour."	All complaints are recorded on the internal management information system 'theHub' and kept under review. A question on theHub asks 'Is there a need to set any limits or restrictions to manage unacceptable behaviour from the Complainant and/or their representatives?' The policy meets the requirements by ensuring that there is a clear standalone policy for managing unacceptable behaviour and any restrictions are justified, proportionate, recorded and reviewable. Restrictions do not affect residents access to services.
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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	Section 4.4.9.2 is clear that any restriction imposed must be proportionate to the behaviour and circumstances stating that "Restrictions will be specific to the complainant and situation, be proportionate to address the unreasonable actions in each case and have regard to the provisions of the Equality Act 2010."	
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Section 6: Complaints Stage				
Code Provision	Code Requirements	Compliant 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	Section 4.3 of the policy explicitly prioritises early and local resolution to concerns / service requests stating that Waythrough encourages staff to proactively resolve issues at the earliest opportunity, to the persons satisfaction and that our staff speak to people who use our services every day and therefore we can often reach quick and effective resolutions to dissatisfaction. Section 4.5.1.2 links complexity directly to the investigation depth and response times stating that if that complain relates to more than one team or is complex it may require a longer investigation. Section 4.5.1.2 also states that complaint handlers will identify complex complaints as early as possible to prevent unnecessary delays. They will consider any vulnerability of the person and associated risks when agreeing a revised timescale with the complainant. Actions to mitigate any immediate risks will be considered.	
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	Section 4.5.1.1 states: that all complaints will be acknowledged in writing, by letter or email, within 3 working days.	The timescales within the Code have been used for our analysis within the Annual Complaints

			Section 4.5.1.1 also confirms that stage 1 acknowledgement will define the complaint and confirm our understanding of the complaint and of the outcome that the person would like. Section 4.1 of the policy states that all feedback received will be recorded on the appropriate incident management system Section 3 of the policy states that complaint handlers are responsible for recording all feedback on the relevant system.	Performance Report
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Section 4.5.1.2 sets out the Stage 1 resolution timeframe stating that Waythrough aims to resolve complaints for residents within 10 working days.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report

Section 6: Complaints Stage				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.5.1.2 acknowledges that some complaints may be complex in nature, for example if the complaint relates to more than one team or requires a longer investigation, and an extension to the policy timescale may be agreed. Section 4.5.1.2 explicitly requires communication and agreement of any extension with the resident stating that where an extension is needed, Waythrough will explain to the complainant and agree a revised timescales for keeping them updated. Section 4.5.1.2 also places a strict limit on extensions stating that they should not exceed 10 working days and should not delay actions to put things right. The same requirements are also mirrored within the escalation process, section 4.6.1, with the policy stating that if timescales within stage 2 of the process cannot be met due to the complexity of the complaint, the Handler will explain to the complainant and agree a revised timescales for keeping them updated.	The policy ensures that any extensions are thoughtful and justified and decisions are based on complaint complexity with residents being clearly informed of revised response times.
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	Section 4.5.1.2 confirms that in the case of revised timescales contact details for the Housing Ombudsman will always be provided.	

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	Section 4.7 (Redress) is explicit that actions do not need to be completed before responding, stating that redress can be arranged at any stage of the process and does not need to wait until the complaint has been closed. This section also states that failings should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the complainant Section 4.7 also states that any further actions that needs to be competed after the person has been informed of the outcomes will continue to be tracked, actioned promptly and updates provided to the person.	
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Section 6: Complaints Stage				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.5.1.7 of the policy states that every element of the complaint must be considered. This section states that the conclusion reached must be based on an objective review of the evidence with an outcome for each of the key points being determined, informing the overall outcome of the complaint. Section 4.5.1.8 sets out in detail what must be included when an outcome is communicated, stating that all points raised within the complaint should be addressed. Section 4.5.1.8 also requires decisions to be grounded in authoritative sources stating that relevant regulations, standards, policies, published guidance and relevant legal obligations and whether they were met should be quoted.	Template letters are used in line with the Code's requirements. The same standard is applied at both stage 1 and stage 2 of the complaint process.
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	Yes	Section 4.5.1.4 explicitly addresses this scenario stating that additional complaints raised by the complainant during the investigation will be incorporated into the investigation if they are relevant and the outcome to the investigation has not been issued. This section also clearly explains what happens where inclusion is not appropriate stating that where the outcome of the	

	delay the response, the new issues must be logged as a new complaint.		investigate has been issued, or it would unreasonably delay the response, the complaint will be logged as a new complaint.	
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; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Section 4.5.1.8 explicitly sets out what must be included in the Stage 1 written response including the response stage, a confirmation of the points to be addressed, the overall outcome of the complaint and the reasons for this, the reasons for any decisions made, details of any remedy offered to put things right, details of outstanding actions and how to escalate to stage 2 if dissatisfied.	Template letters are used in line with the Code's requirements.

Section 6: Complaints Stage – Stage 2				
Code Provision	Code Requirements	Compliant 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 4.6 states that If the complainant is unhappy with all or part of the response to their complaint, Waythrough will progress their complaint to the Appeal Stage. Section 4.6 also confirms that complaints can only be appealed once and that this is the final stage of Waythrough's complaints process before the complaint is closed.	Any complaint not resolved to the resident's satisfaction at Stage 1 is progressed to Stage 2. Stage 2 is clearly confirmed as the landlord's final response. Access to the Ombudsman follows immediately after Stage 2.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Section 4.6.1 states that all appeal requests will be acknowledged in writing, by letter or email, within 3 working days. Stage 2 of the complaints process is further supported by multiple policy sections including Section 3 which states that complaint handlers hold the responsibility for recording all parts of the complaint on the relevant management information system.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report.

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.		Section 4.6 states that the person does not need to give a reason for appealing the outcome, however Appeal Handlers are expected to make reasonable efforts to understand why the person remains unhappy with the initial outcome.	The policy is fully aligned with the Code requirements. Residents can escalate to stage 2 without giving a reason and the landlord does not place the burden on reh resident. Appeal Handlers are required to actively and reasonably seek to understand the dissatisfaction.
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Section 6: Complaints Stage – Stage 2				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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 4.6.2 is explicit that stage 2 is considered by a different person and states that an Appeal Handler should be appointed as soon as an appeal is requested. The Appeal Handler will be a manager more senior than the Complaint Handler and have the authority to resolve the issues highlighted within the complaint and appeal.	The policy fully complies with the requirements of the code clearly separating the stage 1 complaint handler and stage 2 appeal handler.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Section 4.6.1 states that the appeals process (stage 2) and communication to the complainant will be completed within 10 working days.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report.
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 4.6.1 explicitly links extensions to complexity stating that If these timescales cannot be met due to the complexity of the complaint, the Appeal Handler will explain to the complainant and agree a revised timescale for keeping them updated. Any extension should not exceed 10 working days and should not delay actions to put things right. Section 4.6.1 also requires transparent communication stating that the Appeal Handler will explain to the complainant and agree a revised timescales for keeping them updated.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report.

Section 6: Complaints Stage – Stage 2				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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 4.5.1.2 of the policy states that in the case of revised timescales for complaints from Housing residents, contact details for the Housing Ombudsman will always be provided.	
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 4.7 (Redress) is explicit that actions do not need to be completed before responding, stating that redress can be arranged at any stage of the process and does not need to wait until the complaint has been closed. Section 4.7 also states that any further actions that needs to be competed after the person has been informed of the outcomes will continue to be tracked, actioned promptly and updates provided to the person.	The policy aims to ensure that complaint responses are issued promptly once decisions are reached and responses are not delayed waiting for remedial action.
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 4.5.1.7 of the policy explicitly requires a determination for each issue raised, stating that an outcome for each of the key points within the complaint should be determined. Section 4.5.1.8 specifies exactly how outcomes must be explained, stating that all points raised should be addressed. Section 4.5.1.8 also states that any outcome should quote relevant regulations, standards, policies, published guidance and relevant legal obligations and whether these were met.	The same standards apply at both stage 1 and final stage 2 responses.

Section 6: Complaints Stage – Stage 2				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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 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	Yes	Section 4.6.3 explicitly sets out what must be included in the Stage 2 written response including the response stage, a confirmation of the points to be addressed, the overall outcome of the complaint and the reasons for this, the reasons for any decisions made, details of any remedy offered to put things right, details of outstanding actions and how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 4.6 clearly states the complaints can only be appealed once and that this is the final stage of Waythrough's Complaint Process before the complaint is closed'. Section 4.6.2 specifies who must consider the complaint at Stage 2 and states that an Appeal Handler should be appointed as soon as the appeal is requested. The section also states that an Appeal Handler will be a manager more senior than the Complaint Handler and have the authority to resolve the issues highlighted within the complaint and appeal.	

Section 7: Putting Things Right				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance or reasons. • Taking action if there has been delay; • Reconsidering or changing a decision. • Amending a record or adding a correction or addendum. • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Section 4.7 requires acknowledgement of fault stating that any failings should be acknowledged and remedied quickly and fairly. Section 4.5.1.8 states that responses must explain both completed and planned action. Section 4.7 requires ongoing tracking of actions stating that any further actions needing completion after the person has been informed of the outcomes will continue to be tracked, actioned promptly and updates provided to the person.	Further information is included within internal Complaints Guidance and refers to the Ombudsman's Apologies Guidance.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 4.7 directly links remedies to the extent of the disadvantage or harm experienced by the resident, stating that any failings should be acknowledged and remedied quickly and fairly and in a way that best reflects the extent of the problems encountered by the complainant. Section 4.7 also reinforces impact-based redress with a restorative principle stating that where service failings have	

			been identified which have disadvantaged the person, attempts should be made to put the complainant back in the position they were in before the error occurred.	
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 4.5.1.8 requires remedy details and timescales to be set out in the complaint response. Section 4.7 also requires resident involvement in remedy decisions stating that Waythrough will consider the complainant wishes and try to meet these where possible, or where this is not appropriate, provide a full explanation of our position. Section 4.7 is explicit that remedies must be completed and monitored stating that any further actions that need to be completed after the person has been provided of the outcomes will continue to be tracked, actioned promptly and updates provided to the person.	

Section 7: Putting Things Right				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 4.7.1 states that when considering redress for complaints from our residents, the guidance issued by the Housing Ombudsman should be referred to in addition to the relevant Compensation Policy. Section 8.2 of the Complaints Guidance sets out 'What Makes a Good Apology' and refers to the Ombudsman's Apologies Guidance.	The policy fully complies with the Housing Ombudsman Code by explicitly requiring reference to the HO guidance when determining remedies and embeds Ombudsman redress principles across the wider complaints framework.

Section 8: Self-Assessment, Reporting and Compliance				
Code Provision	Code Requirements	Compliant 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 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.	Yes	Section 4.9.3 commits to producing and publishing an annual report stating that we will publish an annual report and self-assessment against the Housing Ombudsman Complaints Handling Code including a response from our Board and any reports or publications around non-compliance from the Ombudsman will be included. Section 11.1.1 of the internal Complaints Guidance sets out the structure of the report in line with the Housing Ombudsman's Complaint Handling Code.	The 2024/25 annual complaints performance and service improvement report was produced, submitted to the Housing Ombudsman and published on the website.

Section 8: Self-Assessment, Reporting and Compliance				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 4.9.3 states that we will publish an annual report and self-assessment against the Housing Ombudsman's Complaints Handling Code, including a response from our Board.	The 2024/25 annual complaints performance and service improvement report was approved and published on the website along with the response from our Board of Trustees.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 4.9.3 commits to updating the Housing Ombudsman self-assessment following any significant changes or at the request of the Ombudsman.	Following the merger of Humankind and The Richmond Fellowship on 1 June 2024, a combined self-assessment was created, submitted to the Ombudsman and published on the website. The Document Change Log of the policy states 'Updated policy following merger'.

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 4.9.3 commits to updating the Housing Ombudsman self-assessment following any significant changes or at the request of the Ombudsman. Section 11.1.1 of the internal Complaints Guidance States that the self-assessment will be reviewed in the event of an investigation by the Ombudsman.	
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	Section 3 of the policy identifies a route for notifying the Ombudsman of non-compliance or exceptional circumstances stating that a member of the Quality & Compliance Team will liaise with the Housing Ombudsman to ensure compliance, where required. Section 4.9.3 commits to transparency and publication stating that we will publish, along with the annual report and self-assessment, any reports or publications around non-compliance from the Ombudsman.	If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance.

Section 9: Scrutiny & Oversight: Continuous Learning and Improvement				
Code Provision	Code Requirements	Compliant 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	Section 4.9.3 states that complaints are used to drive improvement. This section states that complaints, concerns, service requests, comments and compliments are monitored and reviewed to allow Waythrough to identify trends and drive improvement in service delivery. Section 4.9.3 also requires structured analysis and oversight of complaints and associated learning, stating that Waythrough will prepare quarterly reports on the number and type of complaints, outcomes, trends and learning and that they will be monitored and reviewed through our governance meetings and reporting structures. Section 4.9.3 explicitly states that learning must lead to change. The section states that our management team will look to improve procedures or systems or deliver further staff training to address service failures highlighted by the complaint where this is appropriate. Section 3 states that managers are explicitly required to act on learning from complaints and ensure that it is embedded at a service level.	Complaint Handlers and Appeal Handlers are unable to close a complaint on the Hub until the 'Learning Summary' is entered. Learning Summaries are included within reporting to governance meetings and circulated to managers for discussion with staff.

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	Section 4.9.3 states that complaints are used to drive improvement. This section states that complaints, concerns, service requests, comments and compliments are monitored and reviewed to allow Waythrough to identify trends and drive improvement in service delivery. Section 4.9.3 also requires structured analysis and oversight of complaints and associated learning, stating that Waythrough will prepare quarterly reports on the number and type of complaints, outcomes, trends and learning and that they will be monitored and reviewed through our governance meetings and reporting structures. Section 4.9.3 explicitly states that learning must lead to change. The section states that our management team will look to improve procedures or systems or deliver further staff training to address service failures highlighted by the complaint where this is appropriate. Section 3 states that managers are explicitly required to act on learning from complaints and ensure that it is embedded at a service level.	
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	Section 3 of the policy places accountability at the highest level within Waythrough, stating that the Board of Trustees will provide high level oversight of complaints and compliance within requirements of Regulators and Ombudsman	

			Section 3 also states that the Member Responsible for Complaints (MRC) is a member of the Board who is responsible for ensuring the Board receives regular information on complaints. Section 4.9.3 commits to reporting back beyond governance forums stating that changes made as a result of feedback will be promoted to people who use our services and other stakeholders including within newsletters, information within reception areas, websites, groups, panels and councils of people who use our services.	
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Section 9: Scrutiny & Oversight: Continuous Learning and Improvement				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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	Section 3 of the policy assigns responsibility for oversight and analysis of complaints to Quality and Compliance colleagues.	Senior member of the Quality and Compliance Team identifies any themes and trends and reports to the Quality Assurance Oversight Meeting and Quality and Performance Committee
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	Section 3 explicitly appoints a senior lead at Board level stating that the Member Responsible for Complaints (MRC) is a member of the Board who is responsible for ensuring the Board receives regular information on complaints and who provides insight to the governing body on our handling of complaints made by residents.	
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	Section 3 explicitly appoints a senior lead at Board level stating that the Member Responsible for Complaints (MRC) is a member of the Board who is responsible for ensuring the Board receives regular information on complaints and who provides insight to the governing body on our handling of complaints made by residents.	

Section 9: Scrutiny & Oversight: Continuous Learning and Improvement				
Code Provision	Code Requirements	Compliant Yes / No	Evidence	Commentary / Explanation
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 4.9.3 explicitly requires structured performance reporting, stating that we will prepare quarterly reports on the number and type of complaints, outcomes, trends and learning, and any complaints we have refused to accept. Section 4.9.3 also mandates trend analysis and review at a governance level stating that complaints and other types of feedback will be monitored and reviewed through our governance meetings and reporting structures. Section 4.9.3 requires transparency about Ombudsman outcomes stating that any reports or publications around non-compliance from the ombudsman will be included in the annual performance report. Section 3 explicitly appoints a senior lead at Board level stating that the Member Responsible for Complaints (MRC) is a member of the Board who is responsible for ensuring the Board receives regular information on complaints and who provides insight to the governing body on our handling of complaints made by residents.	
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:	Yes	Section 4.1 of the policy sets clear expectations of collaboration, stating that all staff, volunteers and other acting on the	

	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; and c) act within the professional standards for engaging with complaints as set by any relevant professional body.		organisations behalf will take a collaborative and cooperative approach towards resolving complaints, working with colleague's from across teams and departments. The same section goes on to state that we will take collective responsibility for any shortfalls identified through complaints. Rather than blaming others. Section 4.1 also clearly mandates professional conduct states that team members will act with the professional standards for engaging with complaints as set by any relevant professional body/regulator.	
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